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SUBJECT: Forwards application for amends to licenses DPR-80 & DPR-82, revising TS 3/4.3.2, "ESFAS Instrumentation" & 3/4.6.2, "Containment Spray Sys."

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May 9, 1996

PG&E Letter DCL-96-089

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Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
License Amendment Request 96-07: Revision of Technical Specifications 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," and 3/4.6.2, "Containment Spray System" - Administrative Changes

Dear Commissioners and Staff:

Enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82. This license amendment request (LAR) proposes to revise Technical Specifications (TS) 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," and 3/4.6.2, "Containment Spray System." The changes would clarify the description of the initiation signal required for operation of the containment spray system at Diablo Canyon Power Plant (DCPP) and correctly incorporate changes made in previous license amendments (LAs). All of the changes are administrative in nature.

In preparation of amendment requests to operate DCPP Units 1 and 2 on an extended fuel cycle, PG&E is reviewing the surveillance and maintenance history of those TSs which have 18-month surveillance intervals. During the review of the TS regarding containment spray initiation, PG&E determined that the current definitions of the containment spray initiation signal are inconsistent and require clarification.

The testing required to meet the surveillance requirements would not be affected by this TS change. However, to improve the clarity of the TS, PG&E is proposing to revise the TS to enhance the initiation signal definition.

The LAR also proposes to revise TS Table 4.3-2 to reincorporate certain items which were inadvertently changed or deleted by the issuance of LA 89 and 88 on March 2, 1994, and by the issuance of LA 103 and 102 on June 5, 1995. These changes may have resulted, in part, because multiple LARs affected the same TS pages. These LARs were submitted prior to the current practice of cross-

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referencing LARs which affect the same pages, as requested by the NRC. PG&E will continue to work with the NRC project manager to correct any other inconsistencies identified in the incorporation of previous LAs.

The proposed changes are not required to address an immediate safety concern. Therefore, PG&E requests that the NRC review this LAR on a low priority. TS 3/4.3.2 Table 4.3-2 is proposed for revision by LAR 94-11, regarding slave relay test frequency relaxation (PG&E Letter DCL-94-254, dated November 14, 1994). The TS would also be revised by the second submittal in a series of LARs associated with extended fuel cycle operation, scheduled for submittal in May 1996. Additionally, these TS would be revised by PG&E's Standard TS conversion LAR, scheduled for submittal in December 1996. Since these TS changes are administrative only, PG&E requests that the NRC consider incorporation of these changes in conjunction with any of the above licensing actions, at the staff's convenience.

PG&E requests that the associated LA be effective on a schedule commensurate with that of any other licensing actions with which it may be issued, or immediately upon issuance of the LA if issued alone.

Sincerely,

Gregory M. Rueger

cc: Edgar Bailey, DHS
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Enclosures