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 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Gas & Electric Co. 05000275
 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Gas & Electric Co. 05000323
 AUTH. NAME: CRANE, P.A. AUTHOR AFFILIATION: Pacific Gas & Electric Co.
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 3

SUBJECT: Forwards preliminary procedures for special low power test program, in response to NRC request. Formal mods to preliminary procedures will not be submitted to NRC. Current procedures available to inspectors at plant site.

SEE RPTS.

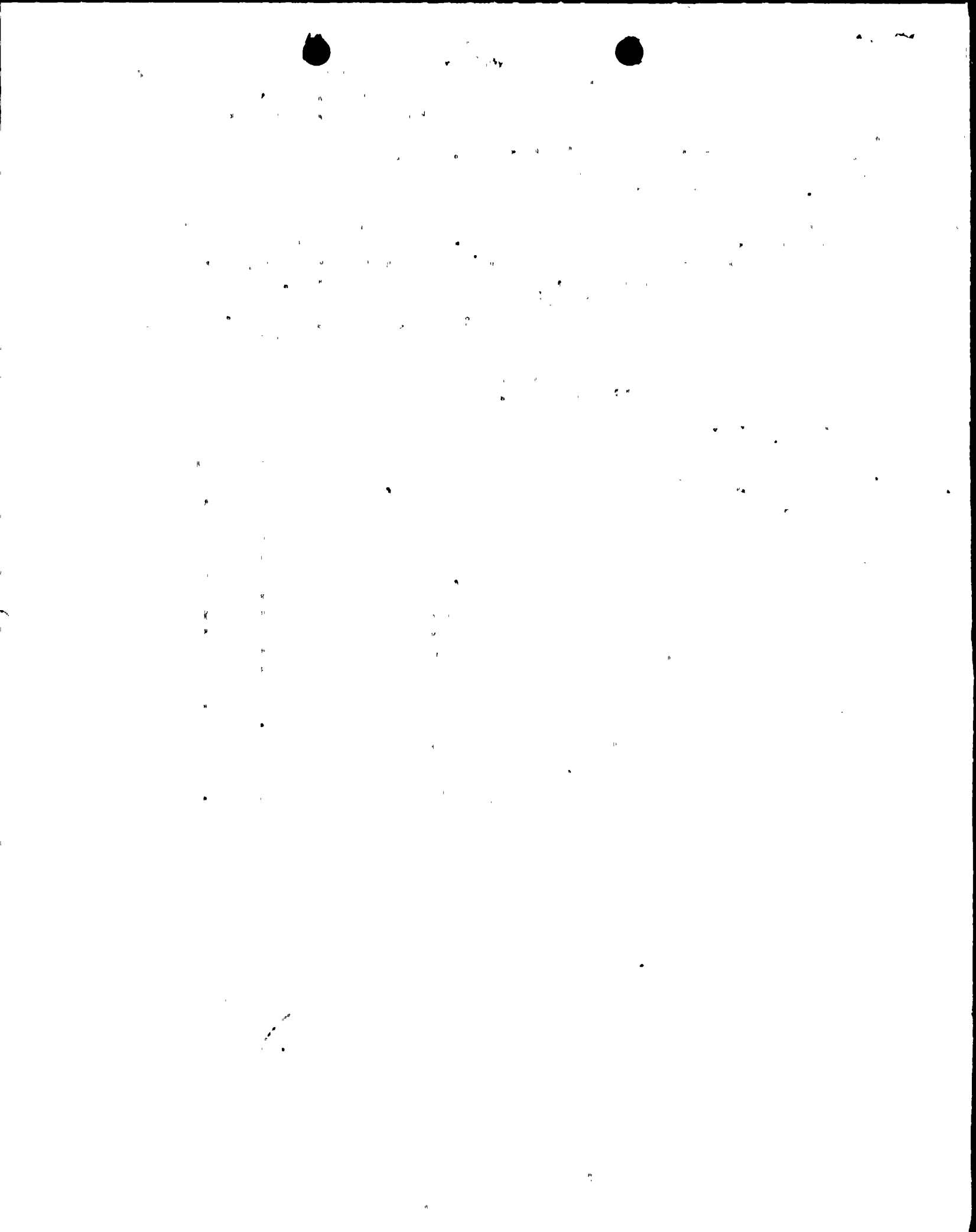
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REGISTRATION SERVICES
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REGISTRATION SERVICES UNIT

Mr. A. Schwencer, Acting Chief
Licensing Branch No. 3
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-275
Docket No. 50-323
Diablo Canyon Units 1 and 2

Dear Mr. Schwencer:

The following information is submitted in response to a request by the NRC Staff:

(1) Low Power Testing - Criterion 3

The Staff has requested copies of the Special Test procedures required for the low power test program. These procedures enclosed as Attachment I are: 44.1 - Special Low Power Test Program, Natural Circulation; 44.2 - Special Low Power Test Program, CVCS Charging and Let-down Cooldown capability; and 44.3 - Special Test Program Simulated Loss of Site AC Power. These procedures are currently being reviewed by Westinghouse. The Staff has also requested as part of Criterion 3 that PGandE provide a safety evaluation that verifies that these special tests do not pose an undue risk to the health and safety of the public. That evaluation has been undertaken by Westinghouse. It is the present opinion of Westinghouse, and we concur, that the same conclusion regarding risks can be made for Diablo Canyon as for the other Near Term Operating License (NTOL) plants which have already been reviewed. This is based upon (a) reviews done for the other NTOL plants, (b) the similarities among the test programs for the NTOL plants and (c) Westinghouse's review of the summary descriptions of the Diablo Canyon tests. PGandE, furthermore, is closely following the low power tests conducted at the other NTOL

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plants and will factor that experience into its test program. The final results of the Westinghouse review and evaluation will be sent to the Staff.

(2) Low Power Testing - Criterion 5

The Staff has requested an evaluation of the radiation levels that will exist in the plant at the completion of the low power test program. Westinghouse has reviewed the requirements of the NRC Lessons Learned Task Force, the Kemeny Commission Report, Rogovin Commission Report, and the Task Action Plan. Westinghouse has concluded that radiation levels, expected at completion of the proposed special tests including those resulting from crud deposits, will not preclude implementation of any of these requirements.

(3) Inadequate Core Cooling Procedures

The Staff has requested copies of the Diablo Canyon operating procedures which outline steps to be taken to restore adequate core cooling, if it should be lost. These procedures (OP-0, Reactor Trip with Safety Injection and OP-1 Loss of Coolant Accident) are enclosed as Attachment II.

(4) Shift Relief and Turnover Procedures

The Staff has requested copies of the procedures which establish a system to evaluate the effectiveness of the shift and relief turnover procedures. That system has been established in procedure NPAP A-101 and its Supplement, "Relieving the Watch," which are enclosed as Attachment III. This procedure specifies that the Shift Technical Advisor will make the required verifications.

(5) Lines of Communication and Authority

The Staff has requested a copy of the procedure that delineates the emergency lines of communication and authority in the control room for plant management not in direct command of operations, including those who report to stations outside the control room such as the on-site Operational Support Center. That procedure is NPAP A-5 "Organizational Control of Emergencies" which is enclosed as Attachment IV.

(6) Degraded Core Training

The Staff has required that a program be developed to

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assure that all operating personnel are trained in the use of installed plant systems to control or mitigate an accident in which the core is severely damaged. PGandE has committed to develop such a program. The Staff has additionally requested that they be provided with the details of that program. Enclosed as Attachment V is STM-01-06-80 "Training Guidelines for Recognizing and Mitigating the Consequences of Severe Core Damage" prepared by the Institute of Nuclear Power Operations (INPO). This document has been reviewed by PGandE and will be used as the basis for its training program.

(7) Noble Gas Effluents

The Staff has required that interim methods for measuring high level radioiodine and radioactive particulates in gaseous effluents be provided. Enclosed as Attachment VI is a description of the Interim Methods for High Level Releases.

(8) Current Staffing Levels

The Staff has requested the current status of staffing the operating organization. Attachment VII updates the off-site technical and onsite plant staff manning levels.

Please note that all procedures submitted to the Staff in this submittal are unsigned and marked FOR INFORMATION ONLY or PRELIMINARY. Signed current copies of each procedure are available to Region V inspectors at the Plant site. PGandE expects to make modifications to these procedures where required for plant safety, to accommodate organizational changes, or for other appropriate reasons. We do not plan to submit these modifications formally to the NRC.

Advance copies of this submittal have been sent by courier to Mr. Bart Buckley.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it to me in the enclosed addressed envelope.

Very truly yours,

Philip A. Erano, J

Enclosures
CC w/encs.: Service List



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