
Safety Evaluation Report

related to the operation of
Diablo Canyon Nuclear Power Plant,
Units 1 and 2

Docket Nos. 50-275 and 50-323

Pacific Gas and Electric Company

U.S. Nuclear Regulatory
Commission

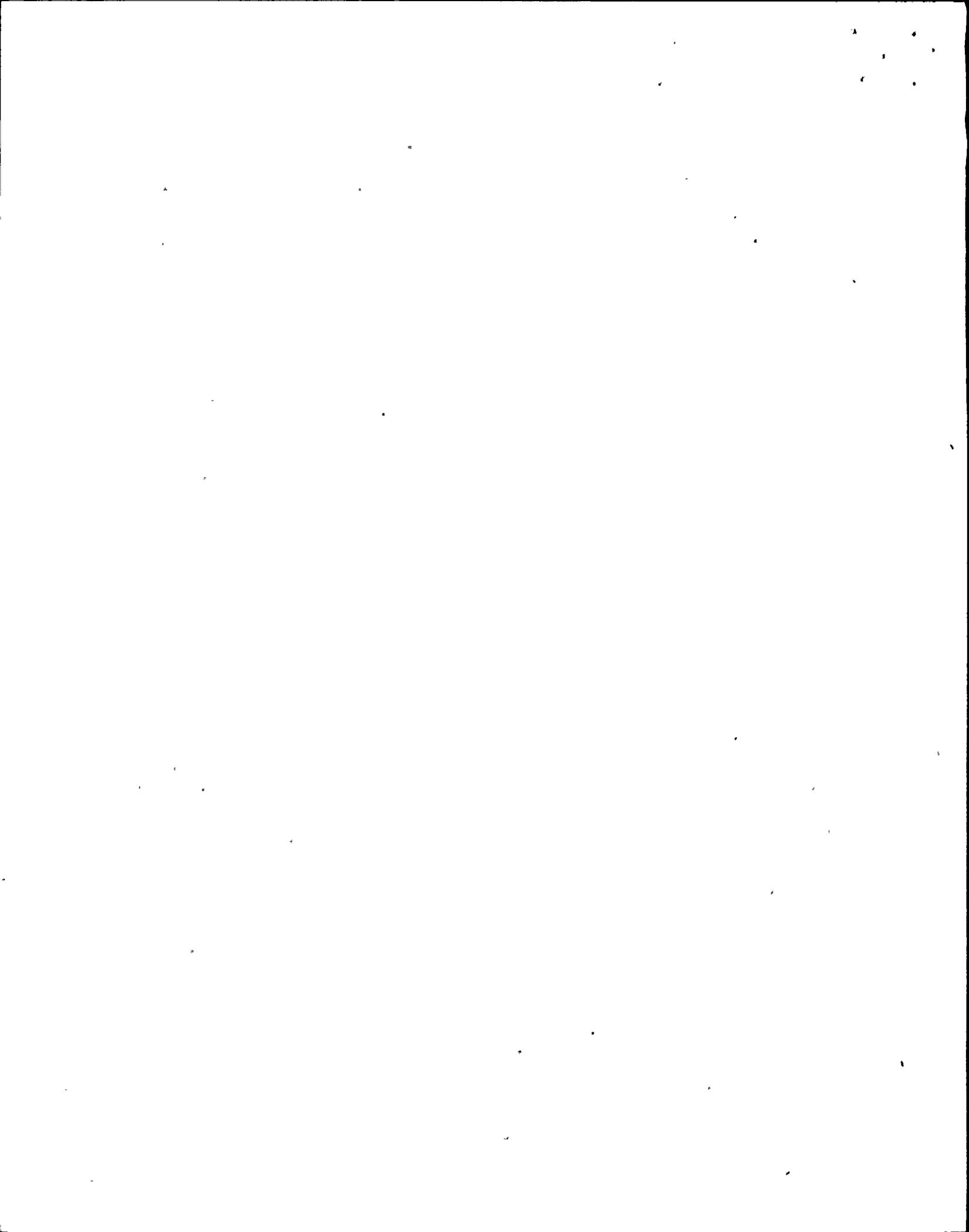
Office of Nuclear Reactor Regulation

MARCH 1981



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III. EMERGENCY PREPARATIONS AND RADIATION PROTECTION

III.A.1.1 Upgrade Emergency Preparedness

Position

Comply with Appendix E, "Emergency Facilities," to 10 CFR Part 50, Regulatory Guide 1.101, "Emergency Planning for Nuclear Power Plants," and for offsite plans, meet essential elements of NUREG-75/111 or have a favorable finding from FEMA.

Discussion and Conclusion

See Section III.A.2 of this supplement.

III.A.1.2 Upgrade Emergency Support Facilities (III.A.1.2(a) of Supplement 10)

Position

Each operating nuclear power plant shall maintain an onsite technical support center (TSC) separate from and in close proximity to the control room that has the capability to display and transmit plant status to those individuals who are knowledgeable, of and responsible for engineering and management support of reactor operations in the event of an accident. The center shall be habitable to the same degree as the control room for postulated accident conditions. The licensee shall revise his emergency plans as necessary to incorporate the role and location of the technical support center. Records that pertain to the as-built conditions and layout of structures, systems and components shall be readily available to personnel in the TSC.

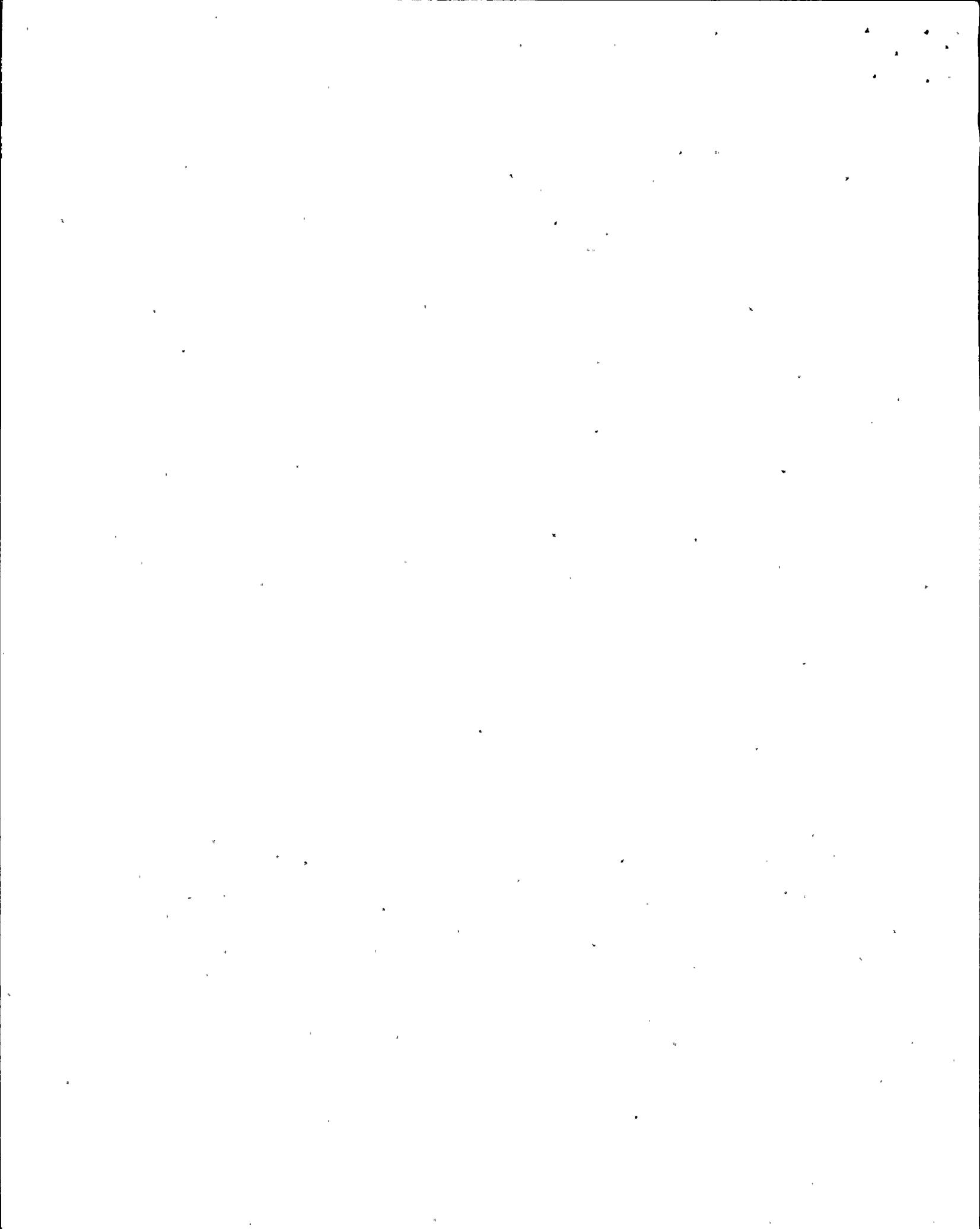
Discussion and Conclusions

Initial Technical Support Center (TSC)

In Supplement 10, the staff concluded that the proposed Temporary On-site Technical Support Center (TSC) was satisfactory for low power testing. Since the issuance of Supplement 10, the applicant has generated procedures EP GA-7 (Emergency Procedure - General Appendix: Activation of the Temporary On-site Technical Support Center). An inspector from our Office of Inspection and Enforcement has reviewed procedure EP GA-7 for content and adequacy and found it to be acceptable. However, the functional capability of the Temporary Onsite Technical Support Center, including the required equipment and instrumentation, is presently being transferred into the Permanent Technical Support Center and will be fully functional by April 1, 1981. Any revisions to procedure EPGA-7 resulting from the relocation of the above cited components will be reviewed by the Office of Inspection and Enforcement prior to fuel load. We conclude that the applicant has satisfied the requirements of NUREG-0737.

Emergency Operation Facility (EOF)

The applicant has established an interim EOF adjacent to the San Luis Obispo County Sheriff's Office, about 11.3 miles from the plant. The EOF, located in a trailer, is equipped with data display equipment and redundant communications



systems. The applicant has proposed to build a permanent EOF at the same location. The location and conceptual design of the permanent facility will be evaluated against the criteria of NUREG-0696, February 1981. We conclude that the temporary EOF is adequate for fuel load and low power testing.

III.A.1.2(b) Onsite Operational Support Center

Position

An area to be designated as the Onsite Operational Support Center shall be established. It shall be separate from the control room and shall be the place to which the operations support personnel will report in an emergency situation. Communications with the control room shall be provided. The emergency plan shall be revised to reflect the existence of the center and to establish the methods and lines of communication and management.

Discussion and Conclusion

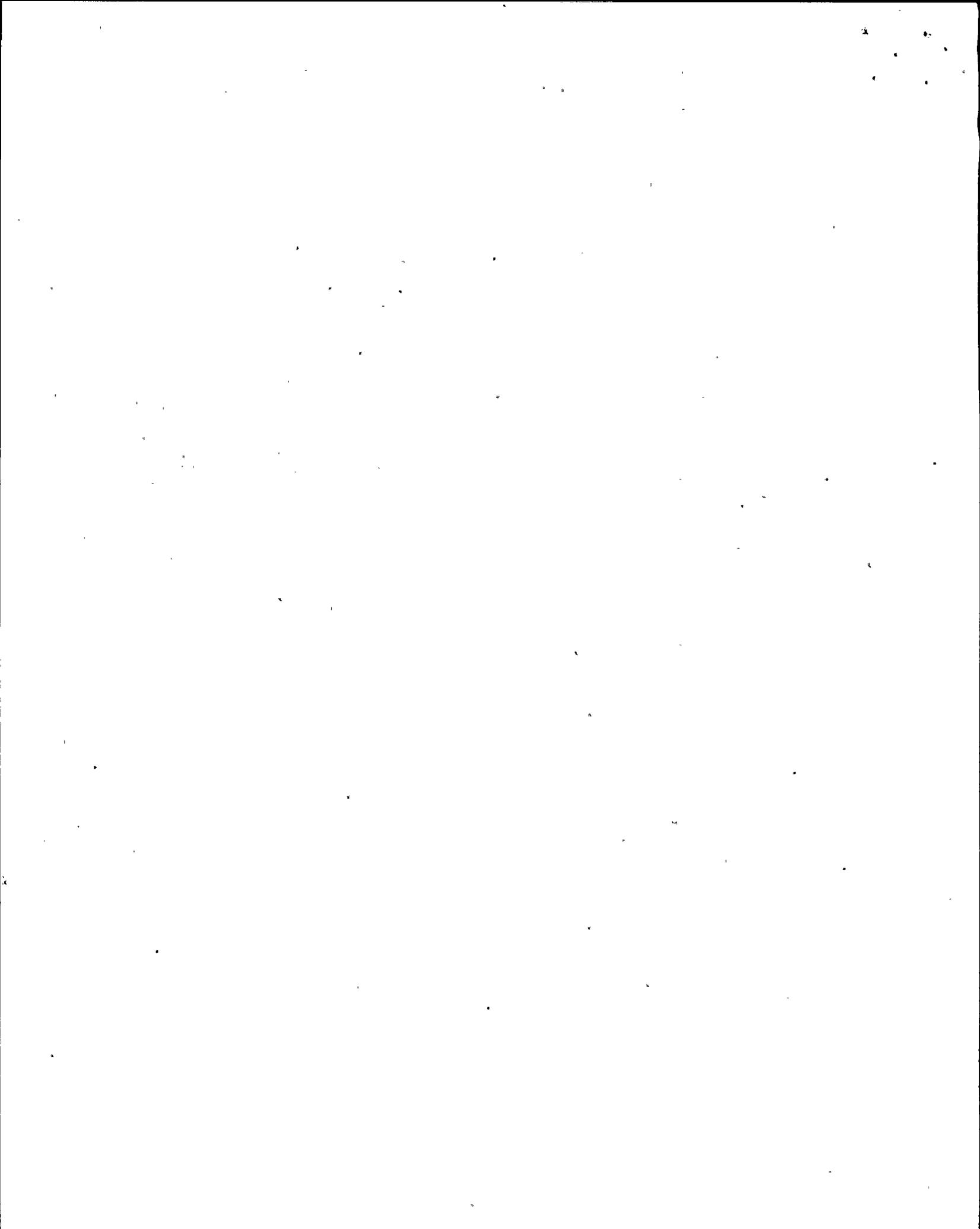
In Supplement 10, the staff concluded that the proposed Onsite Operational Support Center (OSC) was satisfactory for low power testing. Since the issuance of Supplement 10, the applicant has generated procedure EP GA-9 (Emergency Procedure - General Appendix: Activation of the Operational Support Center). Our Office of Inspection and Enforcement has reviewed procedure EP GA-9 for content and adequacy. Based upon this review, the staff has concluded that the applicant has a satisfactory directive that governs activation and utilization of the OSC and conclude that it satisfies the requirements of NUREG-0737.

III.A.2 Improving Licensee Emergency Preparedness--Long-Term

The staff originally stated, in NUREG-0694, that for a low power license, an applicant need only to substantially meet requirements in 10 CFR 50 and its Appendix E (as amended at 38 FR 1272, January 11, 1973), and requirements in Regulatory Guide 1.101. Accordingly, the staff published its evaluation of the applicant, State and local emergency plans in August 1980 (Safety Evaluation Report, Supplement No. 10, Docket Numbers 50-275 and 50-323). All these plans were found acceptable for low-power operation according to NUREG-0694.

Since that time, 10 CFR 50.47 has been added to the Commission's regulation, effective as of November 1, 1980. A new Appendix E to 10 CFR Part 50 is also a part of that regulatory change. Consequently, NUREG-0737 can be read to require the staff to find compliance with all portions of the new Appendix E before it can support an application for fuel load and low power testing. Since the staff concludes that the emergency planning requirements of the new regulation are not relevant to the low power testing activities for which PG&E seeks authorization, the staff believes relief from some of the requirements of Section 50.47 and Appendix E is warranted.

By letter dated February 27, 1981 the applicant requested relief from Items III.A.1.1 and III.A.2 of Enclosure 2 to NUREG-0737. Item III.A.1.1 requires the applicant's emergency plan to comply with Appendix E to 10 CFR Part 50,



and the provisions of NUREG-0654 which stipulate that the State and local emergency plans be completed and implemented. Item III.A.2 requires compliance with Appendix E to 10 CFR Part 50.

The applicant's emergency plan has been reviewed by the staff and found acceptable. FEMA findings on the adequacy of the State and local emergency plans have yet to be made since those plans are not yet completed and implemented. However, the FEMA/NRC Steering Committee had previously specifically approved the emergency preparedness at Diablo Canyon for low power testing on an interim basis. It is the staff's view that the requested relief is warranted and is granted.

If, during low-power operation, an accident were to occur that would release a fraction of the small fission product inventory that would have accumulated during testing, offsite doses would be insignificant and only minimal offsite protective actions would be required (See page 3 of Diablo Canyon Safety Evaluation Report, Supplement No. 10 for discussion of risks). The current onsite and offsite plans would suffice for such events, even though they do not fully comply with NUREG-0654, Rev. 1 requirements. The staff technical position thus remains that adequate emergency preparedness is in place for fuel load and low-power operation.

