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50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323

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SUBJECT: Forwards response to Generic Ltr 82-33,Suppl 1 to NUREG-0737 re requirements for emergency response capabilities.W/one oversize encl.Aperture card is available in PDR.

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TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

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DOCKET: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Gas
50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Gas

DOC.DATE: 84/04/25 NOTARIZED: YES

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SUBJECT: Forwards response to Generic Ltr 82-33,Suppl 1 to NUREG-0737 re requirements for emergency response capabilities.w/one oversize encl,Aperture card is available in PDR.

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	NRR/DSI/ICSB	1	1	NRR/DSI/METB	1	1
	NRR/DSI/RAB	1	1	NRR/DSI/RSB	1	1
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PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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April 18, 1983

Mr. D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
Generic Letter No. 82-33

Dear Mr. Eisenhut:

In accordance with Generic Letter No. 82-33, attached are tentative schedules for completion of the requirements contained in Supplement 1 to NUREG-0737. These schedules are based upon the best information currently available.

PGandE endorses the philosophy of a living integrated schedule. In order to obtain the information necessary to develop that schedule, PGandE is participating with the Nuclear Utility Task Action Committees (NUTACs) and the Westinghouse Owners Group. When these organizations complete their efforts and publish final documents, PGandE will review this information and, where consistent with PGandE goals, will use it to develop the integrated schedule. PGandE will confirm or revise the schedule accompanying this submittal within 30 days after publication of the final documents. PGandE requests that the confirmatory order not be issued until we have had the opportunity to confirm or revise these tentative schedules.

A003
ADD:
W. Paulson

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

Subscribed to in San Francisco, California, this 18th day of April, 1983.

Respectfully submitted,

Pacific Gas and Electric Company

By James O. Schuyler
James O. Schuyler
Vice President
Nuclear Power Generation

Robert Ohlbach
Philip A. Crane, Jr.
Richard F. Locke
Attorneys for Pacific
Gas and Electric Company

By Philip A. Crane, Jr.
Philip A. Crane, Jr.

Subscribed and sworn to before me
this 18th day of April, 1983

Nancy J. Lemaster
Nancy J. Lemaster, Notary Public
in and for the City and County of
San Francisco, State of California

SEAL

My Commission expires April 14, 1986

NANCY J. LEMASTER
NOTARY PUBLIC-CALIFORNIA
CITY AND COUNTY OF
SAN FRANCISCO
My Commission Expires April 14, 1986

Enclosure

cc: Mr. John B. Martin, NRC Region V
Service List

PGandE's RESPONSE
TO
GENERIC LETTER 82-33
(SUPPLEMENT 1 TO NUREG-0737)

1. INTRODUCTION

On December 17, 1982 the NRC Staff issued Generic Letter 82-33, Supplement 1 to NUREG-0737 which provided requirements for emergency response capabilities and replaced the corresponding requirements in NUREG-0737. The requirements contained in Supplement 1 to NUREG-0737 are unique in that they do not specify completion dates. Supplement 1 to NUREG-0737 recognizes the difficulties of implementing generic deadlines and instead, permits the development of plant specific schedules which take into consideration the unique status of each plant. PGandE endorses that philosophy and consistent with it intends to develop a living integrated schedule. This schedule will include the items related to emergency response capabilities and, in the long term, any new requirements imposed by the NRC and any items PGandE considers necessary to improve the performance of the Diablo Canyon Power Plant. PGandE has not completed the development of this integrated schedule; however, this submittal contains tentative schedules which are expected to remain unchanged when the integrated schedule is developed.

In order to develop the integrated schedule PGandE is participating in Nuclear Utility Task Action Committees (NUTAC's) and the Westinghouse Owners Group. Where those organizations provide information consistent with PGandE goals it will be used to develop the integrated schedules. Further details on these industry groups will be provided in the section on Implementation and Integration.

PGandE's current efforts to be responsive is a continuation of our commitment to comply with NRC requirements as well as their recommendations. This was demonstrated by PGandE's responsiveness to NUREG-0578 "Short-Term Lessons-Learned Requirements". When Generic Letter 81-10, "Post-TMI Requirement for the Emergency Operations Facility" and NUREG-0696, "Functional Criteria for Emergency Response Facilities" were issued, PGandE evaluated the installed and proposed facilities and determined that major modifications and upgrading of our facilities and equipment were required to meet those new guidelines.

PGandE designed and commenced construction for a new Emergency Operations Facility to meet the guidelines of NUREG-0696. A contract was awarded to design an upgraded Emergency Response Facility Data System which is currently being installed. This system includes a Safety Parameter Display System (SPDS) for each unit that will be available in both the Technical Support Center and the Emergency Operations Facility. The Safety Parameter Display System was also designed to meet the guidelines of NUREG-0696. Design and construction efforts were started prior to either the issue of SECY 82-111, "Requirements for Emergency Response Capability" or Generic Letter 82-33.

II. IMPLEMENTATION AND INTEGRATION

PGandE is participating in a number of industry groups. These groups include the Nuclear Utility Task Action Committees on SPDS, Detailed Control Room Design Review (DCRDR), and Emergency Response Capabilities; and the Westinghouse Owners Groups for Emergency Response Guidelines and Emergency Response Guidelines Systems Review and Task Analysis.

The NUTAC's were formed to define industry positions on the key issues of Generic Letter 82-33. The NUTAC on Emergency Response Capabilities is developing guidelines for the following:

- Regulatory Guide 1.97, Rev. 2 (AMI) instrumentation implementation.
- Guidance for an integrated emergency response capability implementation plan.
- Component verification and system validation.
- Implementation of emergency response facilities.

The NUTAC for the SPDS has completed its effort; however, the NUTAC's for Emergency Response Capability and Detailed Control Room Design Review are not scheduled to issue their final documents until June 1983.

The Westinghouse Owners Group is presently preparing Revision 1 to the generic technical guidelines for NRC review. These generic technical guidelines, when approved, will be used to develop plant-specific emergency operating procedures.

PGandE has reviewed the drafts of some of these documents; and, where consistent with PGandE's goals, they were used to assist in the scheduling of the requirements specified in Supplement 1. The schedules that are provided in this response are based on the best information available; however, until we have had the opportunity to review the final efforts of the NUTAC's and receive the Westinghouse Owners Group Emergency Response Guidelines, Revision 1, we are not prepared to have these schedules used as the basis for a confirmatory order. PGandE does not expect to make changes to the schedules contained in this response. However, within thirty days after the final documents are issued, PGandE will either confirm or submit new schedules as appropriate.

Considerable effort has been expended in meeting the emergency response capability requirements. The Emergency Response Facilities (ERF's) have been designed and are in various stages of construction; the SPDS has been designed, and is being installed and tested; qualified instrumentation has been installed to monitor approximately 75 percent of the variables listed in Reg. Guide 1.97, Rev. 2, and negotiations are under way to obtain consultant services to assist in the DCRDR.

The DCRDR will be used to verify that an effective integration of the control room emergency response capabilities has been achieved. Examples of how the DCRDR will be used to integrate the other areas are:

1. The task analysis portion of the DCRDR will interface with the development of the Emergency Operating Procedures (EOP's).

2. The control room survey will check the human compatibility of the instrumentation associated with Reg. Guide 1.97, Rev. 2.

3. The validation phase will be used to check the design of the SPDS.

4. The task analysis will provide input to assist in determining training needs of the control room operators.

5. Following determination of discrepancies and the corresponding resolution, input will be provided to assure necessary retraining and procedure revision.

III. STATUS OF THE ITEMS SPECIFIED IN GENERIC LETTER 82-33

A. Safety Parameter Display Systems (SPDS)

1. The SPDS at Diablo Canyon Power Plant is one portion of the Emergency Response Facility Data System which is currently being installed and tested in each unit. Installation of the Unit 1 SPDS is nearly completed, and is presently undergoing testing.

   The SPDS for each unit is a computer based system consisting of a data acquisition system, two data-handler computers, two video generators located in the Technical Support Center (TSC), and two color video monitors located in the Control Room.

   The SPDS utilizes a single display for presentation on each of the control room monitors. This particular display, termed SPDS, will present several plant parameters in real time in a bar chart format. This "SPDS display" will contain information which control room personnel can use to monitor:

   - Reactivity control
   - Reactor core cooling and heat removal from the primary system.
   - Reactor coolant system integrity.
   - Radioactivity control.
   - Containment conditions.

   In addition to the "SPDS display", sixteen other displays are available, which include mimics and decision trees.

   The DCRDR will be used to check the design basis of the SPDS.

2. A safety analysis describing the basis for the parameters selected for the SPDS and an implementation plan is scheduled to be submitted by August 1, 1983.

3. The SPDS is scheduled to be operable for Unit 1 by August 1, 1983 and for Unit 2 by March 1, 1984.

4. Initial operator training on the SPDS is scheduled to be completed by July 1, 1983. Because of the relationships that exist between the SPDS, the EOP's and any revisions that may be necessary as a result of the DCRDR; training on the SPDS is expected to be a continuing effort which would only be completed when the EOP's are implemented and the DCRDR is finished.

B. Detailed Control Room Design Review (DCRDR)

1. In February 1982, PGandE began planning for a DCRDR in response to NUREG-0700, "Guidelines for Control Room Design Reviews." A management team and a multi-disciplinary review team were established. When SECY 82-111, "Requirements for Emergency Response Capability," was issued, it was considered prudent to delay the commencement of the DCRDR until the requirements had been finalized. Negotiations are now in progress to obtain the services of a human factors representative (consultant) to be a member of the review team.

2. The DCRDR Program Plan is scheduled to be submitted by August 1, 1983.

3. The DCRDR Summary Report is scheduled to be submitted by December 31, 1984.

C. Regulatory Guide 1.97

1. PGandE presently complies with Regulatory Guide 1.97 Rev. 2 for approximately 75% of the variables in Table 2 of the Regulatory Guide. Approximately 90% of the instrumentation is installed, but some of it requires replacement with environmentally qualified devices and/or upgrade to meet other requirements.

   At this time devices for measurement of Boric acid charging flow, containment atmosphere temperature, neutron flux, RCS soluble boron concentration, and radioactivity concentration or radiation level in circulating primary coolant, which meet all requirements, are not available. Several other instruments will be ordered with delivery dates currently estimated to extend to July 1984. These factors make it very difficult to plan installation dates and are not factors which can be controlled by the utility.

2. The report specified in paragraph 6.2 of Supplement 1 to NUREG-0737 is scheduled to be submitted by August 15, 1983 for the available instrumentation.

D. Emergency Operating Procedures (EOP's)

1. PGandE is continuing to participate in the Westinghouse Owners Group to develop the Generic Emergency Response Guidelines. First drafts of the Diablo Canyon EOP writers guide, validation and verification program, and a technical instruction for preparation of EOP's have been completed.

2. The procedures generation package is scheduled to be submitted by July 1, 1983.

3. The EOP's are scheduled to be implemented by July 1, 1984, or within one year of the receipt of the revised Westinghouse Owners Group's emergency response guidelines whichever occurs later.

E. Integrated Training Plan

1. The necessary training for operators on the SPDS and EOP's is scheduled to be completed by July 1, 1984. Any training due to modifications resulting from the DCRDR will be completed after the DCRDR is completed.

2. Training on the emergency response facilities will be conducted after the facilities are completed.

F. Emergency Response Facilities (ERF's)

1. Technical Support Center (TSC)

A. The TSC has been successfully tested during two full-scale annual exercises and a number of plant drills. The Emergency Response Facility Data System is being added to the TSC to improve emergency response capabilities. This system is being installed and tested. Training on the system will be conducted after the testing is completed.

B. The TSC is scheduled to be fully functional by September 1, 1983, for Unit 1 and by March 1, 1984 for Unit 2.

2. Operational Support Center (OSC)
The OSC is fully functional.

3. Emergency Operations Facility (EOF)

a. An interim EOF, consisting of an arrangement of trailers, is located 11.7 miles from Diablo Canyon at the San Luis Obispo County Sheriff's facility. This EOF has been successfully tested during two full-scale annual exercises. The interim EOF meets the intent of the requirements. The Emergency Response Facility Data System is being installed in the interim EOF.

b. A permanent EOF is under construction at the San Luis Obispo County Sheriff's facility and will meet Option 2 location and habitability requirements. The projected completion of construction activities is in December 1983. The Emergency Response Facility Data System will be installed in the EOF.

c. The EOF is scheduled to be fully functional for Unit 1 by February 29, 1984 and for Unit 2 by March 31, 1984.

G. The attached schedule illustrates in a bar chart format the basic sequence of events and key intermediate steps necessary to implement the items specified in Generic Letter 82-33. The graph shows the tentative scheduled completion dates and major milestones for the items discussed in this letter. This schedule is a simplified version of the ones that are being used to track the implementation progress. PGandE presently intends to utilize a similar system to integrate future NRC requirements and facility improvements.

PRØJECT TASK
PLØT RED
RUN DATE 07APR83

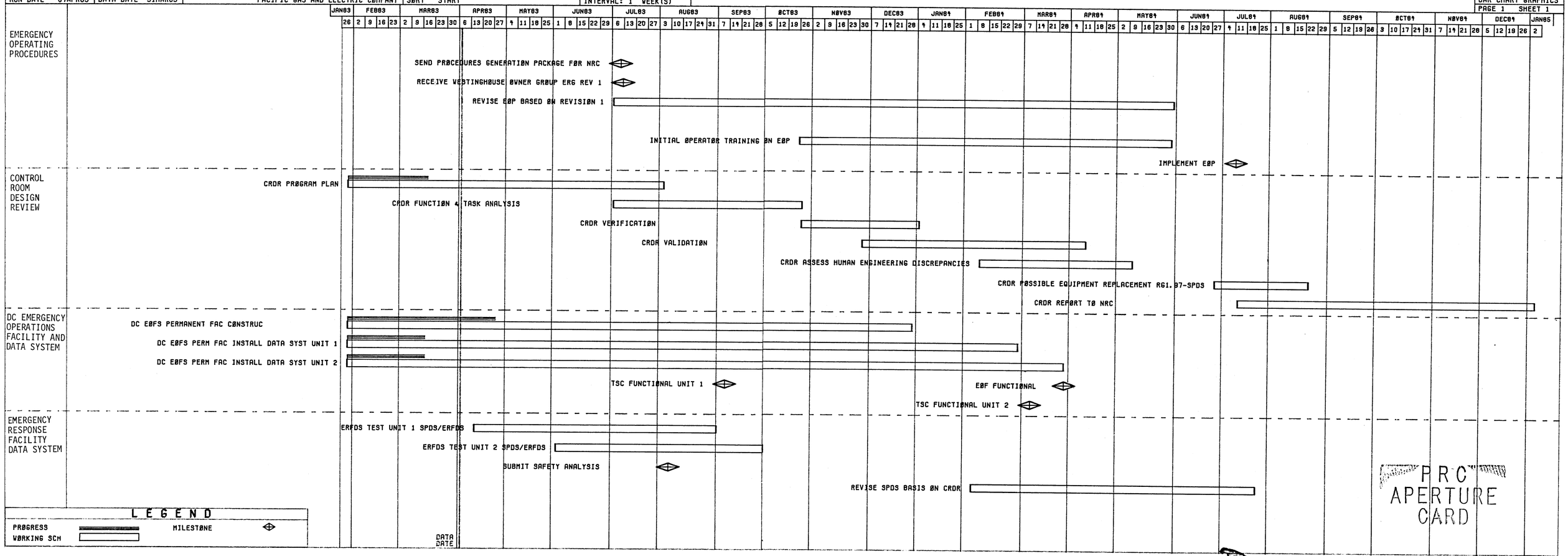
START 1 JUL82
CØMPLETIØN 31DEC84
DATA DATE 31MAR83

ANSVER GENERIC LETTER NØ 82-33 NUREG-737
EMERGENCY RESPØNSE CAPABILITY
PACIFIC GAS AND ELECTRIC CØMPANY

W Ø R K I N G S C H E D U L E
SØRT START

MØDE C/FE
INTERVAL: 1 WEEK(S)

PRØJECT/2 82B2
BAR CHART GRAPHICS
PAGE 1 SHEET 1



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