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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards application for amend to License DPR-80, consisting of change Request 85-01, revising Tech Specs re 10CFR50.73 reporting requirements & radiological effluents to eliminate typos & improve consistency.

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PACIFIC GAS AND ELECTRIC COMPANY

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

January 30, 1985

PGandE Letter No.: DCL-85-028

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
License Amendment Request 85-01
Technical Specifications Changes

Dear Mr. Denton:

Enclosed are three (3) signed and thirty-seven (37) conformed copies of an application for an Amendment to Facility Operating License No. DPR-80. These changes to the Technical Specifications are requested to eliminate typographical errors, provide additional clarification, improve consistency and adjust nomenclature. The changes include the new 10 CFR 50.73 reporting requirements, the Radiological Effluent Technical Specification and also revise portions of the specifications to be in conformance with PGandE's understanding of the latest NRC Staff positions. Also included are changes to describe the differences to be included in the Unit 1 and 2 common Technical Specifications.

The requested changes are based on a detailed and systematic review of the Unit 1 Technical Specifications by PGandE combined with consideration of current NRC Staff positions. Changes to the Radiological Effluent Technical Specifications are based largely upon recent efforts by Westinghouse and the NRC Staff. Changes to reporting requirements are based on implementation of 10 CFR 50.73 in accordance with the guidance provided in Generic Letter 83-43 on the Licensee Event Report System. Discussions with the NRC Staff (Mr. Cal Moon) have led to the understanding that the actions identified as required by Chemistry and Radiation Protection Manager in Technical Specification 6.12.1c may be performed by a delegate. Such delegation must be based on PGandE-approved internal procedures.

The Diablo Canyon Plant Staff has reviewed all proposed changes and determined that the effects on procedures and training will be minimal.

The amendment request includes 22 attachments. Attachments 1 through 19 describe proposed changes to the Unit 1 Technical Specifications. Attachment 20 identifies outstanding License Amendment Requests. Attachment 21 identifies the differences in Unit 1 Technical Specifications to make them applicable to Unit 2. PGandE's intent is to have a common Technical

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Mr. H. R. Denton
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Page 2

Specification for Units 1 and 2 with the unit-specific differences identified. PGandE believes that with our near identical units, a common Technical Specification, with minor differences identified, would be more usable to Operations personnel while clarifying differences and minimizing confusion. Attachment 22 is a marked-up version of the current Unit 1 Technical Specifications (NUREG-1102) showing all proposed changes.

Certain portions of this License Amendment request are considered high priority. These items are identified below with a brief explanation for their priority need.

1. Item 30 of Attachment 21, "Minimum Shift Crew Composition". The change would reflect shift staffing for two-unit operation in accordance with 10 CFR 50.54(m)(2)(i), and guidance provided in Rev. 4 of the Standard Technical Specifications (NUREG-0452).
2. Item 24 of Attachment 21, "Diesel Generator Surveillance Requirement". Following the guidelines presented in Generic Letter 84-15, this change would eliminate unnecessary and excessive testing of the common diesel generator.
3. Attachment 15, "Diesel Fuel Oil." The diesel fuel oil tanks are common to both units. Common specifications would reduce the potential for administrative error due to different sampling requirements.
4. Attachment 1, "Radiological Effluent Technical Specification (RETS)". The RETS addresses systems common to both units. A common RETS would eliminate the potential for operator difficulties that could lead to an administrative error in reporting. It is essential that the RETS be consistent for both units during dual-unit operation.

PGandE requests that these identified items be processed expeditiously.

Pursuant to 10 CFR 170.12(c), an application fee of \$150 is enclosed.

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

Sincerely,



Enclosure

cc: J. O. Ward
Service List



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50-215

LICENSE AMENDMENT REQUEST 85-01 TECHNICAL
SPECIFICATIONS CHANGES.

Docket # 50-275

Control # 8502070275

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ATTACHMENT 1

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to add new Radiological Effluent Technical Specifications necessary to implement the requirements of 10 CFR 50 Appendix I. The amendment provides revised technical specifications for Section 3/4.11, "Radioactive Effluents", Section 3/4.12, "Radiological Environmental Monitoring", and revisions to: applicable definitions in Section 1.0, "Definitions", and Specification 3/4.3.3.9, "Radioactive Effluent Monitoring Instrumentation", and Specification 3/4.3.3.10, "Radioactive Gaseous Effluent Monitoring Instrumentation."

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Section 1.0, "Definitions" (pages 1-4, 1-5, 1-6 and 1-7), Section 3/4.3, "Instrumentation" (pages 3-59 through 3-68), Section 3/4.11, "Radioactive Effluents" (pages 11-1 through 11-19), Section 3/4.12, "Radiological Environmental Monitoring" (pages 12-1 through 12-10), and Section B3/4, "Bases", (pages B3/4 11-1 through B3/4 12-2).

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to add new definitions for Definition 1.19, "Member(s) of the Public" (page 1-4), Definition 1.32, "Site Boundary" (page 1-6), and Definition 1.40, "Unrestricted Area" (page 1-7); to revise definitions for Definition 1.25, "Process Control Program" (page 1-5), and Definition 1.34, "Solidification" (page 1-6). Add minor changes to the Technical Specifications for Specification 3/4.3.3.9, "Radioactive Effluent Monitoring Instrumentation" (pages 3-58 through 3-62), and Specification 3/4.3.3.10, "Radioactive Gaseous Effluent Monitoring Instrumentation" (pages 3-63 through 3-67). Revise extensively Section 3/4.11, "Radioactive Effluents" (pages 11-1 through 11-18), and Section 3/4.12, "Radiological Environmental Monitoring" (pages 12-1 through 12-10); and to revise the applicable areas of Section B3/4, "Bases" for these specifications (pages B3/4 11-1 through B3/4 12-2).

3. Justification:

The changes described are to update the Radiological Effluent Technical Specifications to meet the intent of current NRC Staff positions presented in NUREG-0472, "Standard Radiological Effluent Technical Specifications for Pressurized Water Reactors", and during staff discussions with PGandE.



ATTACHMENT 1 (Cont'd)

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (ii) not likely to involve a significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications; for example, a more stringent surveillance requirement. The proposed changes fit this example in that additional restrictions will be imposed with the addition of the new Radiological Effluent Technical Specifications.



ATTACHMENT 2

REPORTING REQUIREMENTS

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to bring it into conformance with the reporting requirements of 10 CFR 50.73. The amendment changes the Technical Specifications in accordance with the guidance provided in Generic Letter 83-43, "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and Standard Technical Specifications", for the Licensee Event Report System.

The amendment also revises the action statements of the Limiting Condition for Operation of Specification 3.3.3.8, "Fire Detection Instrumentation", Specification 3.7.9.1, "Fire Suppression Water System", Specification 3.7.9.2, "Spray and/or Sprinkler Systems", Specification 3.7.9.3, "CO₂ Systems", Specification 3.7.9.4, "Halon System", Specification 3.7.9.5, "Fire Hose Stations", and Specification 3.7.10, "Fire Barrier Penetrations", to remove the requirement for making a special report. The revision of these specifications is in accordance with guidance provided by the staff during discussions with PGandE.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Section 1.0, "Definitions" (page 1-6), Section 3/4.3, "Instrumentation" (page 3-55), Section 3/4.4, "Reactor Coolant System" (pages 4-15, 4-25, and 4-26), Section 3/4.6, "Containment Systems" (page 6-9), Section 3/4.7, "Plant Systems" (pages 7-26, 7-28, 7-30, 7-32, 7-33, and 7-36), Section 3/4.8, "Electrical Power Systems" (page 8-7), Section B3/4, "Bases" (pages B3/4 4-3 and B3/4 7-7), and Section 6.0, "Administrative Controls" (pages 6-7, 6-10, 6-12, 6-19, 6-20, 6-21, and 6-22).

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to revise: Definition 1.30, "Reportable Event" (page 1-6), Surveillance Requirement 4.4.5.5c of the "Steam Generators" specification (page 4-15); Action Statement a. (Modes 1, 2, 3, 4 and 5) of Limiting Condition for Operation 3.4.8 of the "Specific Activity" specification (pages 4-25 and 4-26); Surveillance Requirement 4.6.1.6.2 of the "Containment Structural Integrity" specification (page 6-9), Surveillance Requirement 4.8.1.1.4 of the "A.C. Sources" specification (page 8-7), the Bases for Specification 3/4.4.5, "Steam Generators" (page B3/4 4-3), and Sections 6.5.1.6f, 6.5.2.7g, 6.6, 6.9 and 6.10.1c of the "Administrative Controls" section (pages 6-8, 6-11, 6-12, 6-13, and 6-20) to include the new reporting requirements of 10 CFR 50.73.



ATTACHMENT 2 (Cont'd)

A.2. (Continued)

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to revise, Action Statement a.2 of Specification 3.3.3.8, "Fire Detection Instrumentation" (page 3-54); Action Statement b.2 of Specification 3.7.9.1, "Fire Suppression Water System" (page 7-26); Action Statement a. of Specification 3.7.9.2, "Spray and/or Sprinkler System" (page 7-28); Action Statement a. of Specification 3.7.9.3, "CO₂ System" (page 7-30); Action Statement a. of Specification 3.7.9.4, "Halon System" (page 7-32); Action Statement a. of Specification 3.7.9.5, "Fire Hose Stations" (page 7-33); Action Statement a. of Specification 3.7.10, "Fire Barrier Penetrations" (page 7-36), and the Bases for Specification 3/4.7.9, "Fire Suppression Systems" (page B3/4 7-6); to remove the requirement for making a special report.

3. Justification:

The changes described are to (1) revise the Technical Specifications to reflect the new reporting requirements of 10 CFR 50.73, in accordance with the guidance provided in Generic Letter 83-43, "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and Standard Technical Specifications", for the Licensee Event Report system and (2) revise the action statements of those fire protection specifications that require a special report to remove this requirement, in accordance with guidance provided by the NRC Staff during discussions on technical specification revision.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vii) of actions not likely to involve a significant hazards consideration is a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. The proposed changes, to incorporate the new reporting Requirements of 10 CFR 50.73, fit this example in that the changes reflect guidance provided by the NRC in new regulations.



ATTACHMENT 2 (Cont'd)

B. (Continued)

Another example is, (vi), a change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method. The proposed change to remove the requirement for making a special report, in accordance with guidance provided by the NRC Staff during discussions on technical specifications, is similar to the example in that the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. However, this change is more conservative than the example, in that the probability and consequences of previously-analyzed accidents are not increased and safety margins are not reduced.



ATTACHMENT 3

ADMINISTRATIVE CHANGES

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to eliminate typographical errors, provide additional clarification, improve consistency and adjust nomenclature to improve format and legibility. These proposed additions and revisions do not change the technical content of the specifications. Examples of some of these changes are: (a) typographical, to correct all the symbol "l"s that were inadvertently used for the number "1" in the original typing, (b) clarification, to the Bases Section 2.1.1 to reflect the present condition of the License by revising the DNB correlation from "W-3" to "R-Grid", (c) consistency, Action Statement 3.5.1b was revised from ".. be in Hot Standby within one hour and be in Hot Shutdown within the next 12 hours" to ".. be in Hot Standby within 6 hours and be in Hot Shutdown within the next 6 hours" to be consistent with the statement of Specification 3.0.3., and (d) nomenclature, in a footnote for Specification 3.4.1.4.1 the word "Loop" was revised to "Train" to correctly describe that portion of the RHR system. The revisions required to incorporate the changes in the areas listed were identified by the NRC Staff and PGandE during discussions on Technical Specification revision.

1. Present condition of license:

As described on the applicable pages of the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), all sections.

2. Proposed condition of license:

Administrative changes as described in the marked-up copy of the Technical Specification (Attachment 22) that include:

- a. Typographical Corrections - Typographical corrections have been made throughout the Technical Specifications. These changes do not affect the meaning or intent of the specifications and include spelling, verb person, and punctuation corrections. Also, the symbol used for the numeral one shall be changed from "l" to "1", where appropriate during retyping.
- b. Clarifications - Language clarifications have been made in various specifications. These clarifications in no way change the substance or intent of the specifications and are wholly consistent with the underlying safety analyses and evaluations. Examples of clarification changes are shown in Bases 2.1.1 (Page B 2-1) to revise the referenced DNB correlation from "W-3" to reflect the current analysis and in Surveillance Requirement 4.10.3.2 (Page 10-3), the test was changed from a "Channel Functional Test" to "An Analog Channel Operational Test," to reflect the correct test to be performed.



ATTACHMENT 3 (Cont'd)

A.2.b.(Continued)

Clarification changes have been made in Specifications 2.1.1 (page 2-1) and 2.1.2 (page 2-1) Bases 2.1.1 (page B 2-1) and 2.2.1 (page B 2-4); Specification 3/4.1.1.3 (page 1-4); Tables 3.2-1 (page 2-18), 4.3-1 (page 3-13) and 3.3-3 (pages 3-15 through 3-18, and 3-22); Specification 3/4.3.3.5 (page 3-48); Table 3.3-9 (page 3-49); Specification 3/4.3.3.9 (page 3-59); Tables 3.3-12 (page 3-61), and 3.3-13 (page 3-66); Specifications 3/4.3.4.1 (page 3-69), 3/4.4.1.3 (page 4-3 and 4-4), 3/4.4.1.4.1 (page 4-5), 3/4.4.1.4.2 (page 4-6), 3/4.4.2.1 (page 4-7), 3/4.4.4 (page 4-10), 3/4.4.6.1 (page 4-18) and 3/4.4.8 (page 4-25); Table 4.4-4 (page 4-27); Specifications 3/4.5.4.1 (page 5-9), 3/4.5.5 (page 5-11), 3/4.6.1.3 (page 6-6); Tables 3.7-1 (page 7-2) and 4.7-1 (page 7-8); Specifications 3/4.7.1.5 (page 7-9), 3/4.7.9.1 (page 7-27), 3/4.7.11 (page 7-37), 3/4.8.3.1 (page 8-15), 3/4.9.1 (page 9-1), 3/4.9.2 (page 9-2), 3/4.9.6 (page 9-6), 3/4.9.8.2 (page 9-9), 3/4.9.10 (page 9-11), 3/4.10.3 (page 10-3) and 3/4.10.5 (page 10-5); and Bases 3/4.0 (page B0-1 and B0-2), 3/4.1.1.4 (page B1-2), 3/4.3.1 and 3/4.3.2 (page B3-1), 3/4.3.3.6 (page B3-3), 3/4.4.2 (page B4-2), 3/4.6.2 (page B4-4), 3/4.4.8 (page B4-5 and B4-6), 3/4.4.9 (page B4-12, B4-13, and B4-16), 3/4.7.1.4 (page B7-2), 3/4.9.1.3 (page B9-3), and 3/4.10.4 (page 10-1).

- c. Consistency Changes - Changes have been made, where appropriate, to improve uniformity within and between specifications that describe, reference, or affect the same or related systems. Examples of consistency changes are shown in Definition 1.12 (page 1-3), where the qualifier of 15-minute half-lives has been removed for consistency with the Specific Activity Specifications; in 3.9.13 (page 9-16), where reference to the FSAR has been relocated to the Bases section; and in Statement 3.5.1b (page 5-1) where the shutdown times have been revised from "...be in Hot Standby within one hour and be in Hot Shutdown within the next 12 hours" to "...be in Hot Standby within 6 hours and be in Hot Shutdown within the next 6 hours" to be consistent with Specification 3.0.3.

Consistency changes have been made in Definition 1.12 (page 1-3); Specification 3/4.2.1 (page 2-1 and 2-2); Table 3.3-1 (page 3-7); Specifications 3/4.4.1.1 (page 4-1), 3/4.5.1 (page 5-1) 3/4.6.1.1 (page 6-1), 3/4.6.2.1 (page 6-11), 3/4.6.3 (page 6-15), 7.1.1 (page 7-1) 3/4.7.3.1 (page 7-11), 3/4.8.1.1 (pages 8-1 and 8-2) and 3/4.9.13 (page 9-16); Bases 3/4.2.4 (page B2-6).



ATTACHMENT 3 (Cont'd)

A.2.(Continued)

- d. Nomenclature Changes - Nomenclature changes have been made, where appropriate, to the names used to designate systems, components, structures, or concepts. These changes do not affect the substance or intent of specifications. An example of a nomenclature change is use of an acronym to designate a system, i.e., changing "Engineering Safety Features" to "ESF".

Nomenclature changes have been made in Definition 1.16 (page 1-4); Bases 2.1.2 (page B2-2) and 2.2.1 (pages B2-3, B2-8 and B2-9); Specification 3/4.1.1.1 (page 1-2), 3/4.1.2.2 (pages 1-8 and 1-9), 3/4.1.2.5 (page 1-12), 3/4.1.2.6 (page 1-13), 3/4.1.3.2 (page 1-18), 3/4.1.3.3 (page 1-19), 3/4.2.1 (page 2-2), and 3/4.4.8 (pages 4-25 and 4-26); Table 4.4-4 (page 4-27); Specification 3/4.6.1.1 (page 6-1), 3/4.6.1.4 (page 6-7), 3/4.6.1.5 (page 6-8), 3/4.7.2.1 (page 7-10), 3/4.9.1 (page 9-1), 3/4.9.3 (page 9-3), 3/4.9.4 (page 9-4), 3/4.9.6 (page 9-6), 3/4.9.8.1 (page 9-8), 3/4.9.8.2 (page 9-9), 3/4.10.1 (page 10-1), and 3/4.10.5 (page 10-5); Bases 3/4.3.1 and 3/4.3.2 (page B3-2), 3/4.4.4 (page B4-2), 3/4.4.5 (page B4-3), 3/4.4.8 (page B4-5), 3/4.6.1 (page B6-1), 3/4.7.1.4 (page B7-2), 3/4.9.7 (page B9-2), and 3/4.9.8 (page B9-2); Specification 5.2.2 (page 5-1).

3. Justification:

The changes described are to eliminate typographical errors, provide additional clarification, improve consistency, and adjust nomenclature to improve format and legibility of the Technical Specifications. These proposed additions and revisions were identified by the NRC Staff and PGandE during discussion on Technical Specification revisions.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (i) of actions not likely to involve a significant hazards consideration is a purely administrative change to the Technical Specifications. The proposed changes fit this example in that all of the changes are administrative in nature and do not change the technical content of the specifications.



ATTACHMENT 4

MOVABLE CONTROL ASSEMBLIES

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to clarify the action statements for Specification 3/4.1.3, "Movable Control Assemblies".

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Specification 3.1.3.1, Action Statements a., b. and c. (pages 1-15 and 1-16), that specify measures to be taken if one or more full length rods are inoperable while in Modes 1 or 2.

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to rewrite Specification 3.1.3.1, Action b. (page 1-15), to address rods that are trippable, but inoperable due to causes other than addressed in Action a. deleting from Action c. the phrase "inoperable due to causes other than addressed in Action a., above, or" add Action d. (page 1-16) that addresses multiple misaligned rods. Remove the words "step counter" from all references to group demand position in the specification, and add a description of the group demand position in the bases.

3. Justification:

The proposed changes divide the Action Statements into four distinct areas of movable control assembly inoperability.

Action a is unchanged and addresses a mechanical failure of one or more full length rods that leaves the rod(s) immovable and /or untrippable. This is the classic stuck rod situation, requiring application of the stringent fix-or-shutdown requirement.

Action b has been revised and now address only an electrical failure of one or more full length rods that leaves the rod(s) immovable, but still trippable and within alignment. This condition does not affect the maintenance of acceptable power distribution or minimum shutdown margin, as the rods are still within alignment and trippable. Movement of other rods can be accomplished if required by plant conditions as long as the alignment criterion is met. If the alignment criterion is not met, Action c. or d. is required.



ATTACHMENT 4 (Cont'd)

A.3.(Continued)

Action c is basically unchanged in content and addresses the misalignment of full length rods and the subsequent required actions. The phrase "...inoperable due to causes other than addressed in Action a., above,..." has been deleted from Action c., as this situation is now covered by the new Action b.

Action d has been added to replace that part of the old Action B that addressed multiple misaligned rods.

Additionally the words "step counter" have been removed to allow other means for determining group demand position to satisfy this specification. This change is consistent with existing Technical Specification 3.1.3.2, "Position Indication Systems - Operating".

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) of actions not likely to involve a significant hazards consideration is a change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method. The proposed change to revise the movable control assemblies specification still meets the basis in that it ensures that (1) acceptable power distribution limits are maintained, (2) the minimum Shutdown Margin is maintained, and (3) the potential effects of rod misalignment on associated accident analyses is limited.



ATTACHMENT 4 (Cont'd)

B.(Continued)

The reworded action statements permit the same variations from the basic requirements, with the only difference being the addition of a relaxation for multiple, electrically immovable rods, that are still trippable and within alignment. This relaxation is justifiable in that the previously mentioned basis is not violated. The benefits of this reworded specification are: increased clarity and the allowing of repair without curtailment to operation of an identifiable electrical failure to multiple movable control assemblies that does not effect their trippability or alignment.

This change is similar to the example in that the results of the change are clearly within all acceptable criteria with respect to system or component specified in the Standard Review Plan.



ATTACHMENT 5

ROD BOW PENALTY

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to delete the Rod Bow Penalty from Specification 3/4.2.3, "RCS Flowrate and Nuclear Enthalpy Rise Hot Channel Factor". This change is the result of the revised analysis described in the Westinghouse Rod Bow Topical Report (WCAP-8691, Rev. 1) and subsequently addressed in the related NRC SER.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Specification 3/4.2.3, "RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor" (pages 2-9 through 2-13), that includes a factor for rod bow penalty in the calculation.

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to delete the Rod Bow Penalty from Specification 3/4.2.3, "RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor" (pages 2-9 through 2-12).

3. Justification:

The NRC has reviewed the Westinghouse Rod Bow Topical Report (WCAP-8691, Rev. 1) and issued an SER on it. The Topical Report analysis and NRC SER are applicable to Diablo Canyon Units 1 and 2 and justify the deletion of the rod bow penalty.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.



ATTACHMENT 5 (Cont'd)

B.(Continued)

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (iv) not likely to involve a significant hazards consideration is a relief granted upon demonstration of acceptable operation from an operation restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met.

The proposed change fits this example in that the referenced Topical Report has been reviewed and approved in an issued NRC Safety Evaluation Report and is applicable to Diablo Canyon Units 1 and 2.



ATTACHMENT 6

STEAM LINE PRESSURE-LOW ALLOWABLE VALUE

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to change the allowable value for the Steam Line Pressure-Low signal to the Steam Flow High Safety Injection, listed in Table 3.3-4, "Engineered Safety Features Actuation System Instrumentation Trip Setpoint".

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Table 3.3-4, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints", Item 1.f.2, "Steam Line Pressure-Low" (page 3-23), and 4.d.2, "Steam Line Pressure-Low" (page 3-26), both have a setpoint of " \geq 585 psig" for their allowable value.

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to revise the allowable value for the, "Steam Line Pressure-Low", setpoint in Table 3.3-4 (pages 3-23 and 3-26), to " \geq 580 psig".

3. Justification:

The change in allowable value for this setpoint is due to revised analysis provided by Westinghouse.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (iv) not likely to involve a significant hazards consideration is a relief granted upon demonstration of acceptable operation from an operation restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met.



ATTACHMENT 6 (Cont'd)

B. (Continued)

The proposed change is similar to the example in that the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. However, this change is more conservative than the example, in that the probability and consequences of previously-analyzed accidents are not increased and safety margins are not reduced as demonstrated in the Westinghouse analysis.



ATTACHMENT 7

SEISMIC MONITORING INSTRUMENTATION

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to change Surveillance Requirement 4.3.3.3.2 to reflect new time intervals for the channel calibration and special report required following a seismic instrumentation actuation during a seismic event.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Surveillance Requirement 4.3.3.3.2 (page 3-42), that currently states that following the activation of the Seismic Monitoring Instrumentation (shown in Table 3.3-7) during a seismic event "... a channel calibration, as applicable, [should be] performed within 5 days following the seismic event" and "a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 10 days ..."

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to revise Surveillance Requirement 4.3.3.3.2 (Page 3-41) shall be revised to say "... a channel calibration, as applicable, [shall be] performed within 10 days following the seismic event" and "a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 14 days ..."

3. Justification:

The proposed change allows for a more realistic time interval to perform a channel calibration on the Seismic Monitoring Instrumentation and to submit the subsequent special report. The increased time interval is due to the need to bring an outside vendor, to the plant, to perform the channel calibration on these monitors. This additional time was also reflected into the time interval for submitting the special report. The time intervals proposed were supplied by the NRC Staff during discussion on Technical Specifications revisions and do not change the intent of the surveillance requirement.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.



ATTACHMENT 7 (Cont'd)

B.(Continued)

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) of actions not likely to involve a significant hazards consideration is a change which may result in some increase to the probability or consequences of a previously-analyzed accident but that is clearly within all acceptable criteria in the Standard Review Plan.

The proposed change is similar to this example in that the surveillance interval to perform the test has been increased slightly to allow time for the vendor to perform the Channel Calibration. However, the change in time is minor and does not affect the acceptance criteria for the seismic monitoring system as described in the Standard Review Plan.



ATTACHMENT 8

NOBLE GAS ACTIVITY MONITOR APPLICABILITY

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to change a notation to Table 3.3-13, "Radioactive Gaseous Effluent Monitoring Instrumentation", to further define the applicability of the Noble Gas Activity Monitor associated with the Containment Purge System.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Table 3.3-13, "Radioactive Gaseous Effluent Monitoring Instrumentation" Instrument 5.a, "Noble Gas Activity Monitor - providing alarm and automatic termination of release (RM-14A and 14B)" (pages 3-65 and 3-66), presently has for its applicability "* at all times."

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) Table 3.3-13, "Radioactive Gaseous Effluent Monitoring Instrumentation", to revise the applicability for Instrument 5.a, "Noble Gas Activity Monitor" (pages 3-64 and 3-65) to "*** whenever containment integrity is required."

3. Justification:

The proposed change only affects the "automatic termination" feature of the Noble Gas Activity Monitor (RM-14A or 14B), since the same monitor, with alarm, is required to be available for Instrument 3.a on Table 3.3-13.

When Containment Integrity is not required, in Mode 5 and a limited time in Mode 6, there is not need to provide automatic termination on the Containment Purge System.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.



ATTACHMENT 8 (Cont'd)

B.(Continued)

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) of actions not likely to involve a significant hazards consideration is a change which may result in some increase to the probability or consequences of a previously-analyzed accident but that is clearly within all acceptable criteria in the Standard Review Plan.

The proposed change is similar to the example in that the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan. However, this change is more conservative than the example, in that the probability and consequences of previously-analyzed accidents are not increased and safety margins are not reduced.



ATTACHMENT 9

CONTAINMENT LEAKAGE SPECIFICATION

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to change Surveillance Requirement 4.6.1.2c Item 3. to include new wording to comply with ANSI N45.4-1972.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Surveillance Requirement 4.6.1.2c.3 (page 6-3) that states: "Requires the quantity of gas injected into the containment or bled from the containment during the supplemental test to be equivalent to at least 25 percent of the total measured leakage rate at either greater than or equal to P_a , 47 psig, or greater than or equal to P_t , 25.0 psig, or at least four times the measured leakage in any one hour period."

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to revise Surveillance Requirement 4.6.1.2c.3 (page 6-3) to state: "Requires that the rate at which gas is injected into the containment or bled from the containment during the supplemental test is between $0.75 L_a$ and $1.25 L_a$ or $0.75 L_T$ and $1.25 L_T$."

3. Justification:

The proposed change is to clarify the surveillance requirement in accordance with the test method outlined in ANSI N45.4-1972 Appendix C.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples, (vi) of actions not likely to involve a significant hazards consideration is a change which may result in some increase to the probability or consequences of a previously-analyzed accident but that is clearly within all acceptance criteria in the Standard Review Plan.



ATTACHMENT 9 (Cont'd)

B. (Continued)

The proposed change is similar to the example in that the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. However, this change is more conservative than the example, in that the probability and consequences of previously-analyzed accidents are not increased and safety margins are not reduced with the the rewording of Surveillance Requirement 4.6.1.2c.3.



ATTACHMENT 10

VENTILATION SYSTEMS

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to update references to ANSI Standard N510-1975, in various surveillance requirements, to the more recent version, N510-1980.

1. Present condition of license:

As described in the applicable pages of the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102). This change would affect Sections 4.7.5, "Control Room Ventilation System" (pages 7-14 and 7-15), 4.7.6, "Auxiliary Building Safeguards Air Filtration System" (page 7-17), 4.9.12, "Fuel Handling Building Ventilation System" (pages 9-14 and 9-15), and their related Basis (pages B7-4 and B9-3), that presently have references to the 1975 version of ANSI N510.

2. Proposed condition of license:

Change as described in the marked-up copy of the Technical Specifications (Attachment 22) to revise Surveillance Requirements 4.7.5.1c.3 (page 7-14), 4.7.5.1e.3 (page 7-15), 4.7.5.1f (page 7-15), 4.7.5.1g (page 7-15), 4.7.6.1b.4 (page 7-17), 4.7.6.1d.3 (page 7-17), 4.7.6.1e (page 7-17), 4.7.6.1f (page 7-17), 4.9.12b.4 (page 9-14), 4.9.12e (page 9-14), and 4.9.12f (page 9-15), and Basis 3/4.7.5 (page B7-3), 3/4.7.6 (page B7-4) and 3/4.9.12 (page B9-3), to reference ANSI Standard N510-1980 rather than N510-1975.

3. Justification:

The changes described are to update ventilation system Technical Specification surveillance requirements to reference a more recent version of ANSI Standard N510.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.



ATTACHMENT 10 (Cont'd)

B. (Continued)

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (i) of actions not likely to involve a significant hazards consideration is a purely administrative change to the Technical Specifications. These proposed changes are administrative in nature only. The 1980 version of ANSI Standard N510 reflects a clarification of test requirements without changing the acceptance criteria, thus the change is administrative in nature and does not involve a significant hazards consideration.



ATTACHMENT 11

FIRE SUPPRESSION WATER VALVES

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to address the surveillance frequency for verification of several fire suppression water valves inside containment. The amendment would add a footnote to Surveillance Requirement 4.7.9.1c that allows locked or sealed fire suppression water valves inside containment to be verified in the correct position during each Cold Shutdown rather than "at least once per 31 days."

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Surveillance Requirement 4.7.9.1c (page 7-27) that states that the Fire Suppression Water System shall be demonstrated operable "at least once per 31 days by verifying that each valve (manual, power operated, or automatic) in the flow path is in its correct position."

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to add a footnote to Surveillance Requirement 4.7.9.1c (page 7-27) to qualify the word "valves" by stating "*Except valves which are located inside the containment and are locked, sealed, or otherwise secured in position. These valves shall be verified in the correct position during each Cold Shutdown except such verification need not be performed more often than once per 92 days."

3. Justification:

The addition of this footnote is similar to the footnote on Surveillance Requirement 4.6.1.1a (page 6-1) for Containment Integrity that allows less frequent verification of those valves "which are located inside the containment and are locked, sealed, or otherwise secured in the closed position." The reason for this qualification is due to ALARA considerations. Due to the limited access into the containment and the locking or sealing of these valves (for documentation and insurance) in the correct position, there is sufficient confidence that the increase in the surveillance interval will not compromise the systems operability. The overall benefit of this change will be the reduction of exposure to personnel who would have had to make a containment entry at power to perform the verification for Surveillance Requirement 4.7.9.1c.



ATTACHMENT 11

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously-evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) of actions not likely to involve a significant hazards consideration is a change which may result in some increase to the probability or consequences of a previously-analyzed accident but that is clearly within all acceptable criteria in the Standard Review Plan.

The proposed change fits this example in that a relaxation in the surveillance interval in itself may result in a slight increase in the probability of unavailability of Fire Suppression Water to components in the containment. However, compensatory measures shall be taken to lock or seal these valves in the correct position to ensure availability. With this offsetting action the net benefit for this change is the reduction in radiation exposure to operating personnel performing the surveillance test (ALARA consideration). The change is minor and does not affect the acceptance criteria for the Fire Suppression Water System as described in the Standard Review Plan.



ATTACHMENT 12

SPRAY AND/OR SPRINKLER SYSTEMS

A. Description of amendment request:

This amendment revises the Technical Specification of the Operating License to add additional areas to Specification 3/4.7.9.2, "Spray and/or Sprinkler Systems" (page 7-38).

1. Present condition of license:

As described in the Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), the Limiting Condition for Operations of Specification 3/4.7.9.2, "Spray and/or Sprinkler Systems" (page 7-28), lists those areas and equipment for which spray and/or sprinkler systems shall be operable.

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to add the following additional areas to the Limiting Condition for Operation of Specification 3.7.9.2 "Spray and/or Sprinkler Systems" (page 7-28): "g. Centrifugal Charging Pumps Area" and "h. Containment Penetration Area". Also Specification 3.7.9.2e shall be revised to say "e. Auxiliary Feed Pumps Area."

3. Justification:

The changes described are to update the list of areas required to have spray and/or sprinkler systems operable to provide equipment protection.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (ii) not likely to involve a significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications; for example, a more stringent surveillance requirement.

The proposed changes are similar to this example in that an additional restriction is imposed by requiring additional areas to be protected by spray and/or sprinkler systems.



ATTACHMENT 13

FIRE BARRIER PENETRATION

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to change the applicability of the Fire Barrier Penetration Technical Specification in accordance with staff guidance on 10 CFR 50 Appendix R. -

1. Present condition of license:

As described in the Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), the applicability for Specification 3.7.10, "Fire Barrier Penetrations" (page 7-36), is "at all times."

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to make the applicability of Technical Specification 3.7.10, "Fire Barrier Penetrations" (page 7-36), "Whenever the equipment protected by the fire barrier penetration is required to be OPERABLE."

3. Justification:

The change is to update the fire barrier penetration specification to agree with the current NRC staff position presented in the April 5, 1984 Regional Appendix R Workshop.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the possibility or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) not likely to involve a significant hazards consideration is a change which may either result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.



ATTACHMENT 13

B. (Continued)

The proposed change is similar to the example in that the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. However, this change is more conservative than the example, in that the probability and consequences of previously-analyzed accidents are not increased and safety margins are not reduced since the inoperability of the fire barrier penetrations will not affect the operability of the equipment protected, if the equipment is not required to be operable.



ATTACHMENT 14

24 HOUR LOAD TEST

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to clarify testing requirements for the Diesel Generators as described in Surveillance Requirement 4.8.1.1.2b.8 with a footnote.

1. Present condition of license:

As described in the applicable pages of the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Surveillance Requirement 4.8.1.1.2b.8 (page 8-5) and associated footnote.

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22), the footnote used to clarify Surveillance Requirement 4.8.1.1.2b.8 (page 8-5) was revised to say "If Specification 4.8.1.1.2b.5) is not satisfactorily completed it is not necessary to repeat the preceding 24 hour test. Instead, the Diesel Generator may be operated at 2484 kW for 1 hour or until operating temperature has stabilized".

3. Justification:

The change described is to prevent unnecessary testing of the Diesel Generators. The proposed footnote change was supplied by the NRC Staff during discussion on Technical Specifications revisions and reflects the NRC Staff concern presented in Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability".

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) not likely to involve a significant hazards consideration is a change which may result in some increase to the probability or consequences of a previously-analyzed accident but that is clearly within all acceptable criteria in the Standard Review Plan.



ATTACHMENT 14

B. (Continued)

The proposed change is similar to the example in that the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. However, this change is more conservative than the example, in that the probability and consequences of previously-analyzed accidents are not increased and safety margins are not reduced. The proposed change clarifies the Diesel Generator testing requirements, and does not change the acceptance criteria specified in the Standard Review Plan.



ATTACHMENT 15

DIESEL FUEL OIL SPECIFICATION

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to incorporate new Surveillance Requirements for emergency diesel fuel oil. -The proposed change is designed to provide improvement in the level of confidence for the quality of the diesel fuel oil.

1. Present condition of license:

As described in the applicable pages of the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Specification 4.8.1.1.3 (page 8-6), outlines the testing requirements for the emergency diesel fuel oil.

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to incorporate new surveillance requirements for emergency diesel fuel oil, Specification 4.8.1.1.3 (page 8-6).

3. Justification:

The changes described revise Specification 4.8.1.1.3 (page 8-6) to incorporate the Surveillance Requirements proposed in the SNUPPS report, "Surveillance Requirements for Emergency Diesel Fuel Oil Systems In Nuclear Power Plants", September 23, 1983. The proposed surveillance requirements provide assurance that the fuel oil meets the acceptance criteria.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (iv) not likely to involve a significant hazards consideration is a relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated.



ATTACHMENT 15 (Cont'd)

B.(Continued)

The proposed change is similar to this example in that the new surveillance requirements for the diesel fuel oil is based on the SNUPPS report, "Surveillance Requirements for Emergency Diesel Fuel Oil Systems in Nuclear Power Plants," September 23, 1983. The proposed surveillance requirements in the SNUPPS Report are designed to provide improvement in the level of confidence in the quality of the diesel fuel oil and to assure that the diesel fuel oil is maintained within its acceptance criteria.



ATTACHMENT 16

FREQUENCY OF BATTERY TEST

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to change the frequency for performing the battery capacity performance discharge test for Specification 3/4.8.3.1.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), Surveillance Requirement 4.8.3.1f (page 8-15) requires the battery capacity performance discharge test to be performed annually.

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to revise Surveillance Requirement 4.8.3.1f (page 8-15) to say "At least once per 18 months during shutdown by performing a performance discharge test ..."

3. Justification:

The proposed change allows for a more realistic time interval to perform this test since the batteries are required to be operable during Modes 1, 2, 3 and 4 and the batteries must be removed from service for the performance of this test. This change was supplied by the NRC Staff during discussion on Technical Specifications revisions and do not change the intent of the surveillance requirement.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) of actions not likely to involve a significant hazards consideration is a change which may result in some increase to the probability or consequences of a previously-analyzed accident but that is clearly within all acceptable criteria in the Standard Review Plan.



ATTACHMENT 16 (Cont'd)

B. (Continued)

The proposed change is similar to this example in that the surveillance interval to perform the battery capacity performance discharge test has been increased slightly to allow the test to be performed when the batteries are not required to be operable. However, the change in time is minor and does not affect the acceptance criteria for the batteries as described in the Standard Review Plan.



ATTACHMENT 17

ADD 3.0.3/3.0.4 TO REFUELING SPECIFICATIONS

A. Description of amendment request:

This amendment revises the Technical Specifications to conform with the current NRC Staff position on various Refueling Operation specifications. These changes make Specification 3.0.3 and/or 3.0.4 not applicable in several situations not related to reactor operation. PGandE was advised of this staff position in meetings with the NRC.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specifications (NUREG-1102), the Action Statements of Specification 3.9.7, "Crane Travel-Fuel Handling Building" (page 9-7), 3.9.9, "Containment Ventilation Isolation System" (page 9-10), 3.9.11, "Water Level-Spent Fuel Pool" (page 9-12), and 3.9.12, "Fuel Handling Building Ventilation System" (page 9-13).

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to state that Specifications 3.0.3 and 3.0.4 are not applicable to Specification 3.9.7, "Crane Travel-Fuel Handling Building" (page 9-7), 3.9.9, "Containment Ventilation Isolation System" (page 9-10), and 3.9.11, "Water Level-Spent Fuel Pool" (page 9-12); and Specification 3.0.3 is not applicable to Specification 3.9.12, "Fuel Handling Building Ventilation System" (page 9-13).

3. Justification:

The changes described are to revise the Refueling Operation Specifications to conform to the current staff positions presented in meetings with the licensee.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (vi) not likely to involve a significant hazards consideration is changes which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.



ATTACHMENT 17 (cont'd)

B. (Continued)

The proposed change is similar to the example in that the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. However, this change is more conservative than the example, in that the probability and consequences of previously-analyzed accidents are not increased and safety margins are not reduced. The revised specifications are concerned with the spent fuel pool and not with reactor operation. Therefore, Specifications 3.0.3 and 3.0.4 that deal with reactor operations are not applicable to these specifications.



ATTACHMENT 18

ORGANIZATIONAL CHANGES

- A. This amendment revises the Technical Specifications of the operating license to incorporate various organizational changes to section 6.0, "Administrative Controls",

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specification (NUREG-1102) Section 6.0, "Administrative Controls", Subsection 6.1, "Responsibility" (page 6-1), Subsection 6.2, "Organization" (pages 6-1 through 6-6), Subsection 6.3, "Unit Staff Qualifications" (page 6-6), Subsection 6.4, "Training" (page 6-6), Subsections 6.5.1.6 and 6.5.1.7 "Plant Staff Review Committee (PSRC) Responsibilities" (pages 6-7 and 6-8), Subsection 6.5.1.8, "Plant Staff Review Committee (PSRC) Records" (page 6-8), Subsection 6.5.2, "General Office Nuclear Plant Review and Audit Committee (GONPRAC)" (pages 6-9 through 6-12), Subsection 6.6, "Reportable Occurrences Action" (page 6-12), Subsection 6.7, "Safety Limit Violation" (page 6-12), Subsection 6.9.1.4, "Annual Reports" (page 6-15), Subsection 6.9.1.6, "Annual Radiological Environmental Operating Report" (pages 6-16) and Subsection 6.9.1.8, "Semi-annual Radioactive Effluent Release Report" (page 6-17).

2. Proposed condition of license:

Changes as described in Subsections 6.1 through 6.5 and 6.9 of the marked-up copy of the Technical Specifications (Attachment 22) to reflect a plant organization as opposed to a unit organization.

Changes as described in the marked-up copy of the Technical Specifications to the titles of various members of the organization.

On Figure 6.2-1, "Offsite Organization" (page 6-2), the title "Technical Assistant to Vice President Nuclear Power Generation" is revised to "Manager, Nuclear Operations Support"; the title "Quality Assurance Engineer" is revised to "Director of Quality Support" the title "Manager, Nuclear Plant Operations" has been deleted and "On Site Organization" has been revised to "Plant Organization."

On Figure 6.2-2, "Unit Organization" (page 6-3) the title "Quality Assurance Engineer" has been revised to "Director of Quality Support"; the title "Tech Asst to VP Nuclear Power Generation" has been revised to "Manager, Nuclear Operations Support" and the Figure title revised from "Unit Organization" to "Plant Organization."

In Subsection 6.5.1.6, 6.5.1.7 and 6.5.1.8, "Plant Staff Review Committee (PSRC) Responsibilities" (pages 6-8 and 6-9), the title "Manager of Nuclear Plant Operations" has been revised to "Vice President, Nuclear Power Generation." Reference to "Chairman of GONPRAC" has been deleted.

In subsection 6.2.3, "Onsite Safety Review Group (OSRG)" (page 6-5), the title "Technical Assistant to the Vice President, Nuclear Power Generation" has been revised to "Manager, Nuclear Operations Support".



ATTACHMENT 18 (Cont'd)

In subsection 6.5.2, "General Office Nuclear Plant Review and Audit Committee (GONPRAC)" (pages 6-9 through 6-11), under "Composition 6.5.2.2" the title "Manager, Nuclear Plant Operations" has been revised to "Manager, Nuclear Operations Support"; and one new member has been added with the title "Assistant to the Vice President, Nuclear Power Generation" as Vice Chairman. The footnote at the bottom of the page describing qualifications for two revised titles has been deleted.

Under "Review" Subsection 6.5.2.7, item "i" regarding "Reports and Meeting Minutes of the Plant Staff Review Committee" the words "and the Onsite Safety Review Group" have been added.

In subsection 6.6 and 6.7, "Reportable Event Action" and "Safety Limit Violation" (page 6-12), the title "Manager of Nuclear Plant Operations" has been revised to "Vice President, Nuclear Power Generation" and "Executive Vice President, Facilities and Electric Resources Development," respectively.

3. Justification:

These changes are necessary to reflect a plant organization and PGandE's reorganization of Nuclear Power Generation. The changes provide for direct reporting of the Plant Manager to the Vice President, Nuclear Power Generation and also result in more operational experience for the GONPRAC organization.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (1) of actions not likely to involve a significant hazards consideration is a purely administrative change to the Technical Specifications. The proposed changes fit this example in that all of the changes are administrative in nature and do not change the technical content of the specifications.



ATTACHMENT 19

RHR SUCTION ISOLATION VALVES

A. Description of amendment request:

This amendment revises the Technical Specifications of the Operating License to delete the requirement to lock open the Residual Heat Removal (RHR) Suction Isolation Valves, 8701 and 8702, when the positive displacement charging pump is in operation and the unit is in "Mode 4" with the temperature of any RCS cold leg less than or equal to 323°F, or when in Mode 5 and Mode 6 with the reactor vessel head on.

1. Present condition of license:

As described in the current Diablo Canyon Unit 1 Technical Specification (NUREG-1102), Specification 3/4.4.9.3, "Overpressure Protection Systems", Limiting Condition for Operation 3.4.9.3a (page 4-34) that states, "RHR system isolation valves 8701 and 8702 open with power removed from the valve operators when the positive displacement charging pump is in operation."

2. Proposed condition of license:

Changes as described in the marked-up copy of the Technical Specifications (Attachment 22) to delete Limiting Condition for Operation 3.4.9.3a (page 4-35) and create a new Limiting Condition for Operation 3.4.9.3a by combining the existing Limiting Condition for Operation 3.4.9.3b and 3.4.9.3c.

3. Justification:

The change described is to conform with NRC requirements as described in Diablo Canyon SSER-21.

B. Proposed basis for no significant hazards consideration determination:

The standards used to arrive at a proposed determination that a request for amendments involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that the operation of the facilities in accordance with the proposed amendments would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.



ATTACHMENT 19 (Cont'd)

The Commission has provided guidance concerning the application of these standards by providing examples of amendments considered likely, and not likely, to involve a significant hazards consideration. These were published in the Federal Register on April 6, 1983. One of the examples (iv) of action not likely to involve a significant hazards consideration is a relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated when the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and it is justified in a satisfactory way that the criteria have been met. Diablo Canyon SSER-21 authorizes removal of this Action Statement following installation of an RHR low flow alarm. The RHR flow flow alarm has been installed and is functional for both Unit 1 and Unit 2.



ATTACHMENT 20

OUTSTANDING LICENSE AMENDMENT REQUESTS

A. Description:

Several outstanding license amendment requests are included in the marked-up copy of the Technical Specifications (Attachment 22) as follows:

1. Specification 4.7.1.2a, "Auxiliary Feedwater System" (page 7-4), was revised to increase the testing frequency from once per 31 days to once per 92 days. This request was made in LAR 84-04.
2. The feedwater bypass valves and their closure times have been added to Notation (2) of Table 3.3-5, "Engineered Safety Features Response Times" (page 3-31). This request was made in LAR 84-10.
3. The Basis 6.1.4, "Internal Pressure" (Page B3/4 6-1), was revised to reflect the changes made to "Containment Spray Timing" in amendment No. 7 to the Unit 1 Operating License. This change to the Basis was originally requested in License Amendment Request 83-06 along with the other containment spray timing changes; however, it was inadvertently left out of the subsequent License Amendment.



ATTACHMENT 21

UNIT 2 DIFFERENCES

The common Technical Specifications for Diablo Canyon Unit 1 and 2 are based upon the current Unit 1 Technical Specifications (NUREG-1102), however, a few minor revisions were required to make the Unit 1 Technical Specifications applicable to both units. The attached marked-up copy of the Technical Specifications (Attachment 22) includes the Unit 2 differences described below.

The final product is a common Diablo Canyon (both Units 1 and 2) Technical Specification, with the bottom of all pages corrected to reflect this.

1. Definition 1.28, "Rated Thermal Power" (page 1-5), was revised to include the Unit 2 power level of 3411 MWt.
2. The footnote on Item 12 of Table 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" (page 2-4), was revised to include the Unit 2 loop design flow. The value for Unit 2 is 87,700 gpm which is slightly higher than Unit 1 due to differences in Unit 2 reactor internal characteristics which result in decreased head losses.
3. The value for reference T_{AVG} in Notes 1 and 3 of Table 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" (pages 2-7 and 2-9), was revised to include the Unit 2 value of 577.6°F. The difference is due to the higher rated thermal power and loop design flow of Unit 2.
4. The value for the steam/feedwater flow mismatch described in the Limiting Safety System Settings Bases was revised to include the Unit 2 setpoint of 1.49×10^6 lbs/hour (page B2-7). The difference is due to the higher rated thermal power of Unit 2.
5. Figure 3.1-1b, "Rod Bank Insertion Limit Versus Thermal Power" (page 1-24), was added to include the rod insertion limits for Unit 2. The higher rod insertion limits are due to the higher rated thermal power of Unit 2 which requires more available negative reactivity to meet the shutdown margin requirements.
6. Figure 3.2-3b, "RCS Total Flowrate Versus R" (page 2-13), was added to include the different limits for Unit 2. The difference is due to the higher loop design flow of Unit 2.
7. The value for Reactor Coolant System T_{AVG} in Table 3.2-1, "DNB Parameters" (page 2-18), was revised to include the Unit 2 value of 582°F. The difference is due to the higher rated thermal power and loop design flow of Unit 2.
8. Item 1.b, "Control Room Ventilation Mode Change", of Table 3.3-6, "Radiation Monitoring Instrumentation" (page 3-38), was revised and a footnote was added to clarify the minimum channels operable requirement of the monitors on the common Control Room Ventilation System.



ATTACHMENT 21 (Cont'd)

9. A footnote was added to Specification 3.3.3, "Seismic Instrumentation" (page 3-42), to reflect that the Seismic Monitoring Instrumentation is common to both units.
10. A footnote was added to Specification 3.3.4, "Meteorological Instrumentation" (page 3-45), to reflect that the Meteorological Monitoring Instrumentation channels are common to both units.
11. A footnote was added to Specification 3.3.7, "Chlorine Detection Systems" (page 3-54), to reflect that the Chlorine Detection Systems are common to both units.
12. Some instrument locations on Table 3.3-11, "Fire Detection Instruments - Panel B" (page 3-57), were revised to include Unit 2 locations. Also, a footnote was added to this table (page 3-58) to reflect that fire pumps and Diesel Generator No. 3 are common to both units.
13. A footnote was added to Table 3.3-12, "Radioactive Liquid Effluent Monitoring Instrumentation" (page 3-60), to reflect that instruments 1.a, "Liquid Radwaste Effluent Line Radioactivity Monitor (RM-18)", 2.a, "Liquid Radwaste Effluent Line Flow Rate Device (FR-18)", 2.c, "Oily Water Separator Effluent Line Flow Rate Device (FR-251)" and 3.a, "Oily Water Separator Effluent Line Radiation Monitor (RM-3)" are common to both units.
14. Table 4.4-5, "Reactor Vessel Material Surveillance Program - Withdrawal Schedule" (page 4-30), was revised to include the Unit 2 values.
15. The Containment Firewater Isolation Check Valve number for Unit 2 was added to Table 3.6-1, "Containment Isolation Valves" (page 6-24), since the valve number is different from Unit 1.
16. A footnote was added to Specification 7.5, "Control Room Ventilation System" (page 7-13), to reflect that the Control Room Ventilation System is common to both units.
17. A note was added to Item c., "Diesel Generator No. 3 Flooding System", of Table 3.7-3, "CO₂ System" (page 7-31), that states that this system is common to both units.
18. Item e, "CO₂ Hose Reel Subsystem Stations", of Table 3.7-3, "CO₂ System" (page 7-31), was revised to include the Unit 2 hose reel identification numbers.
19. Table 3.7-4, "Fire Hose Stations" (pages 7-34 and 7-35), was revised to include the locations and hose station identifications for Unit 2.
20. A note was added to Item 15, "Diesel Generator No. 3 Room", of Table 3.7-5, "Area Temperature Monitoring" (page 7-38), that states that this area is common to both units.
21. A footnote was added to Specification 7.12, "Ultimate Heat Sink" (page 7-39), to reflect that the Ultimate Heat Sink is common to both units.



ATTACHMENT 21 (Cont'd)

22. A footnote was added to Specification 7.13, "Flood Protection" (page 7-40), to reflect that the Breakwaters (east and west) are common to both units.
23. The Limiting Condition for Operation of Specification 3.8.1.1, "A.C. Electrical Power Sources", Section b.2) (page 8-1) was revised to reflect the required diesel generators fuel storage volume for multiple unit operation. For one unit operation a volume of 31,023 gallons of fuel is required. For two unit operation a volume of 52,046 is required.
24. A footnote was added to Surveillance Requirement 4.8.1.1.2 (page 8-3) for testing the common Diesel Generator 3. The footnote states that (1) Diesel Generator 3 is common to both units and need not be tested more frequently than required to satisfy the operability requirement for the most limiting unit, (2) that unit specific portions of the surveillance test on Diesel Generator 3 need only be performed on the applicable unit on an alternating test basis, and (3) the performance of the surveillance test on Diesel Generator 3 for one unit shall not place the other unit in an ACTION statement.
25. A footnote was added to Specification 9.8.2, "Refueling Operations - Low Water Level" (page 9-9), for Residual Heat Removal (RHR) Pump operability during refueling operations when the water level above the top of the reactor vessel flange is less than 23 feet. The footnote allows for core alterations in the vicinity of the reactor vessel hot legs with the RHR pumps secured for up to 1 hour per 8 hour period. This relaxation is only applicable prior to initial criticality and therefore is only applicable to Unit 2.
26. Specification 9.13 "Spent Fuel Shipping Cask Movement" (page 9-16), was revised to add a Unit 2 reference to the Limiting Condition for Operation. The reference is in regard to Spent Fuel shipping cask movement near the spent fuel pool and states "... or south of column line 23.1 for Unit 2".
27. A footnote was added to Specification 11.1.3, "Liquid Radwaste Treatment System" (page 11-6), to reflect that the Liquid Radwaste Treatment System is common on both units.
28. Table B 3/4.4-1a (page B4-8) was revised by adding Unit 1 to the title. Tables B 3/4.4-1b, B 3/4.4-1c and B 3/4.4-1d (pages B4-9 and B4-10) were deleted and substituted by a new table B 3/4.4-1b, "Reactor Vessel Toughness Data-Unit 2" (page B4-9), which includes the specific data for Unit 2.
29. The Reactor Coolant System Volume described in Specification 5.4.2, "Volume" (page 5-5), was revised to reflect the Unit 2 value.
30. Table 6.2-1, "Minimum Shift Crew Composition" (page 6-4), was revised to reflect two unit operation. The revised table was based on the guidance provided in Revision 4 of the Standard Technical Specifications (NUREG-0452).
31. Subsection 6.5.2, "General Office Nuclear Plant Review and Audit Committee (GONPRAC)" (pages 6-10 through 6-12) of Section 6.0 "Administrative Controls" was revised to reflect two unit operation by changing the word "unit" to "plant" in several instances.



ATTACHMENT 22

MARKED UP TECHNICAL SPECIFICATIONS

This attachment provides the entire Unit 1 Technical Specification (Appendix A to Operating License DPR-80) marked up to indicate all proposed changes including the Unit 2 differences.



NUREG-1111

DIABLO CANYON NUCLEAR POWER STATION

UNIT 1

TECHNICAL SPECIFICATIONS

APPENDIX "A"

TO

LICENSE NO. DPR-83

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INDEX

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