

Attachment A

EGG-EA-7038
April 1986

INFORMAL REPORT

CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3,
DIABLO CANYON, UNIT NOS. 1 AND 2

R. Haroldsen



**Idaho
National
Engineering
Laboratory**

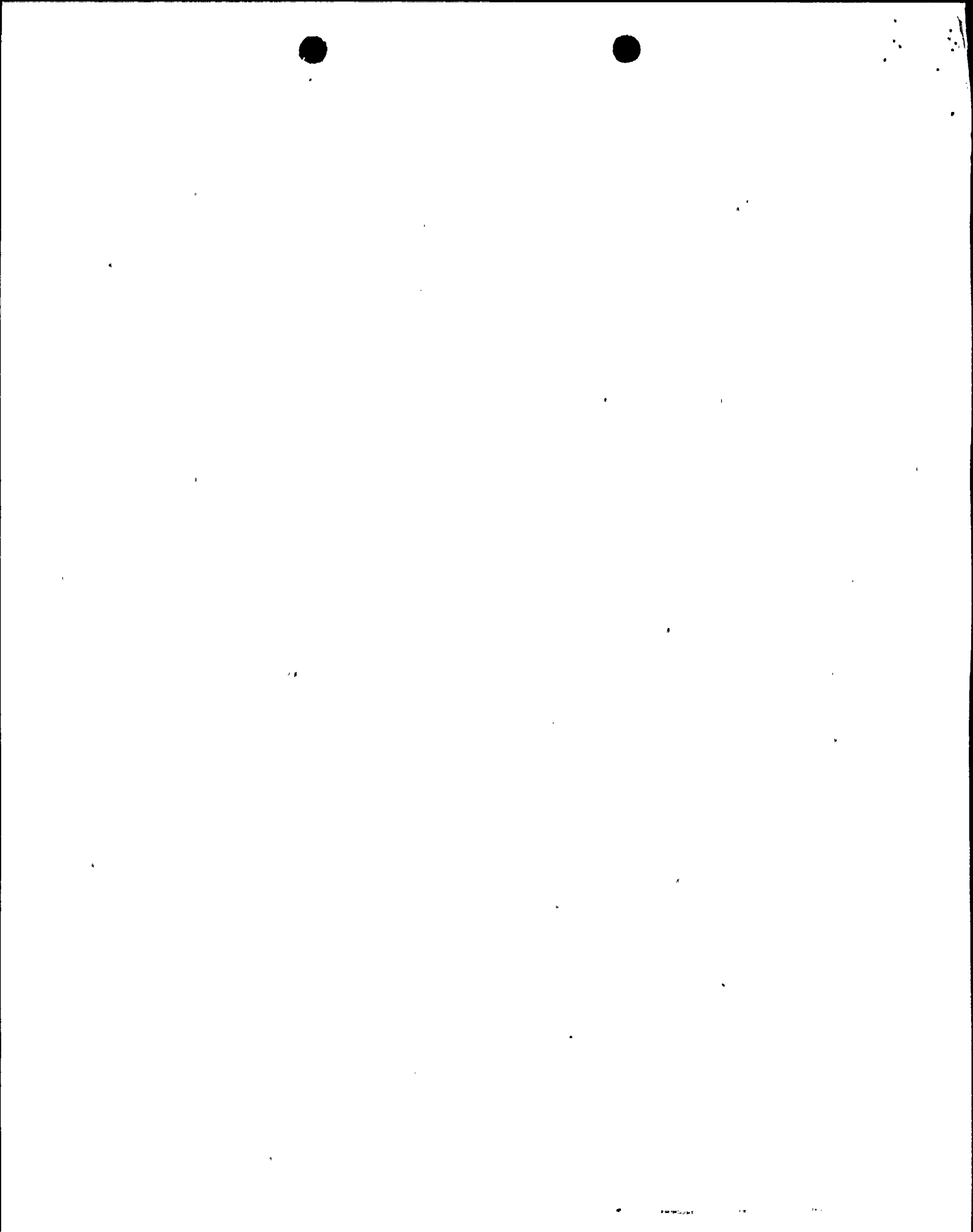
Managed
by the U.S.
Department
of Energy



Work performed under
DOE Contract
No. DE-AC07-76ID01570

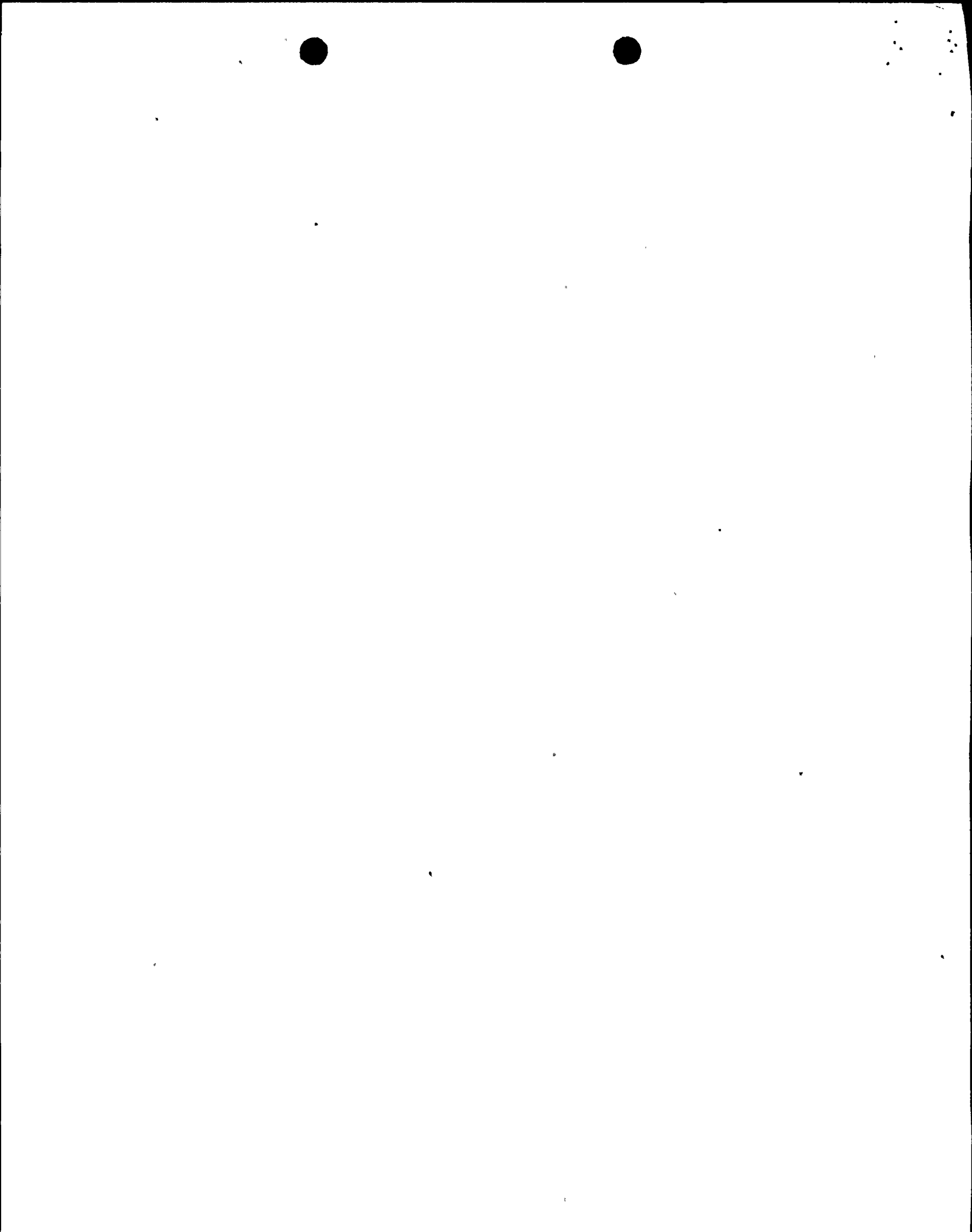
Prepared for the
U. S. NUCLEAR REGULATORY COMMISSION

8605070595 XA 11 pp.



DISCLAIMER

This book was prepared as an account of work sponsored by an agency of the United States Government. Neither the United States Government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product or process disclosed, or represents that its use would not infringe privately owned rights. References herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise, does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government or any agency thereof. The views and opinions of authors expressed herein do not necessarily state or reflect those of the United States Government or any agency thereof.



EGG-EA-7038

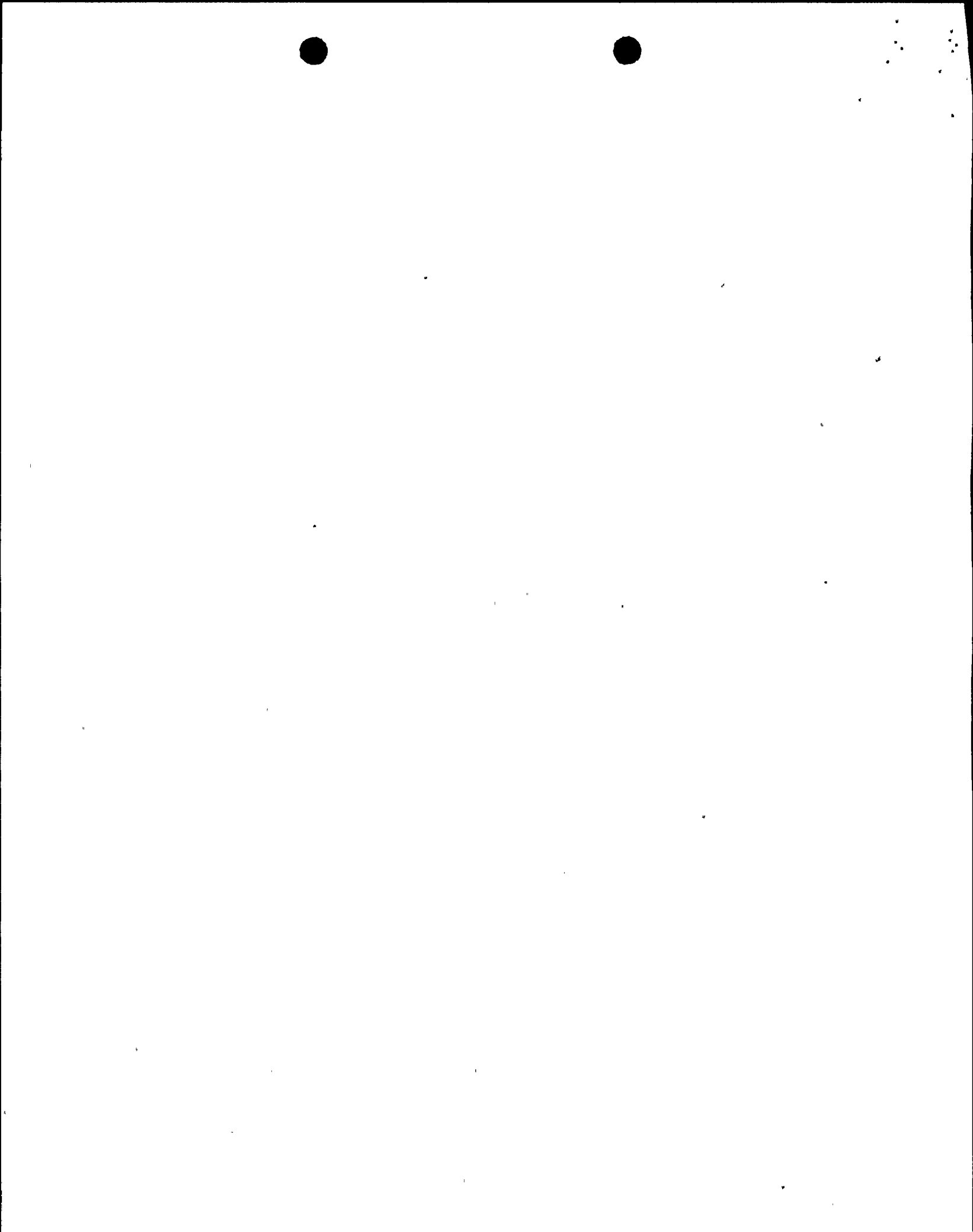
CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
DIABLO CANYON, UNIT NOS. 1 AND 2

R. Haroldsen

Published April 1986

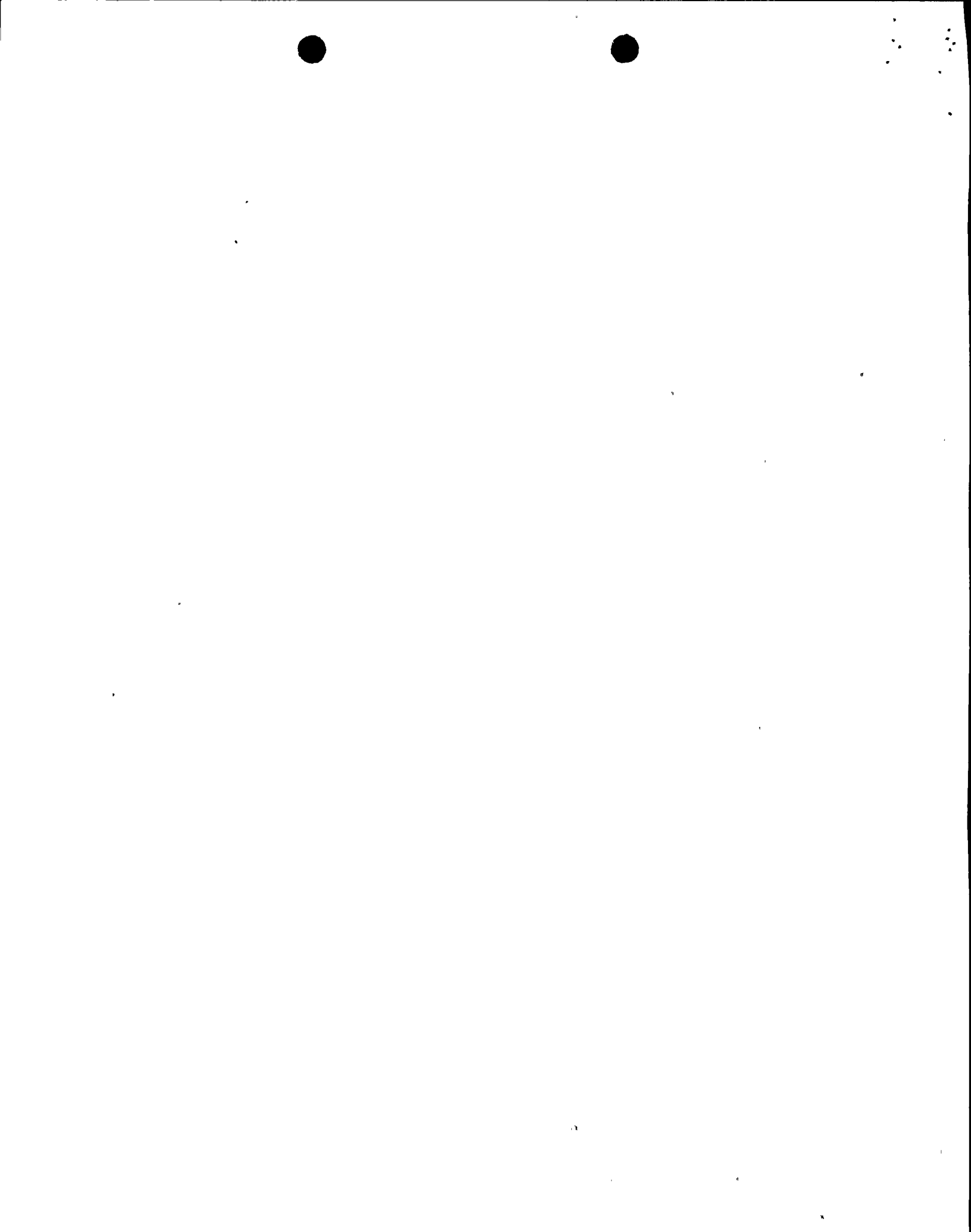
EG&G Idaho, Inc.
Idaho Falls, Idaho 83415

Prepared for the
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Under DOE Contract No. DE-AC07-76ID01570
FIN No. D6C01



ABSTRACT

This EG&G Idaho, Inc., report provides a review of the submittals from the Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2, for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3.



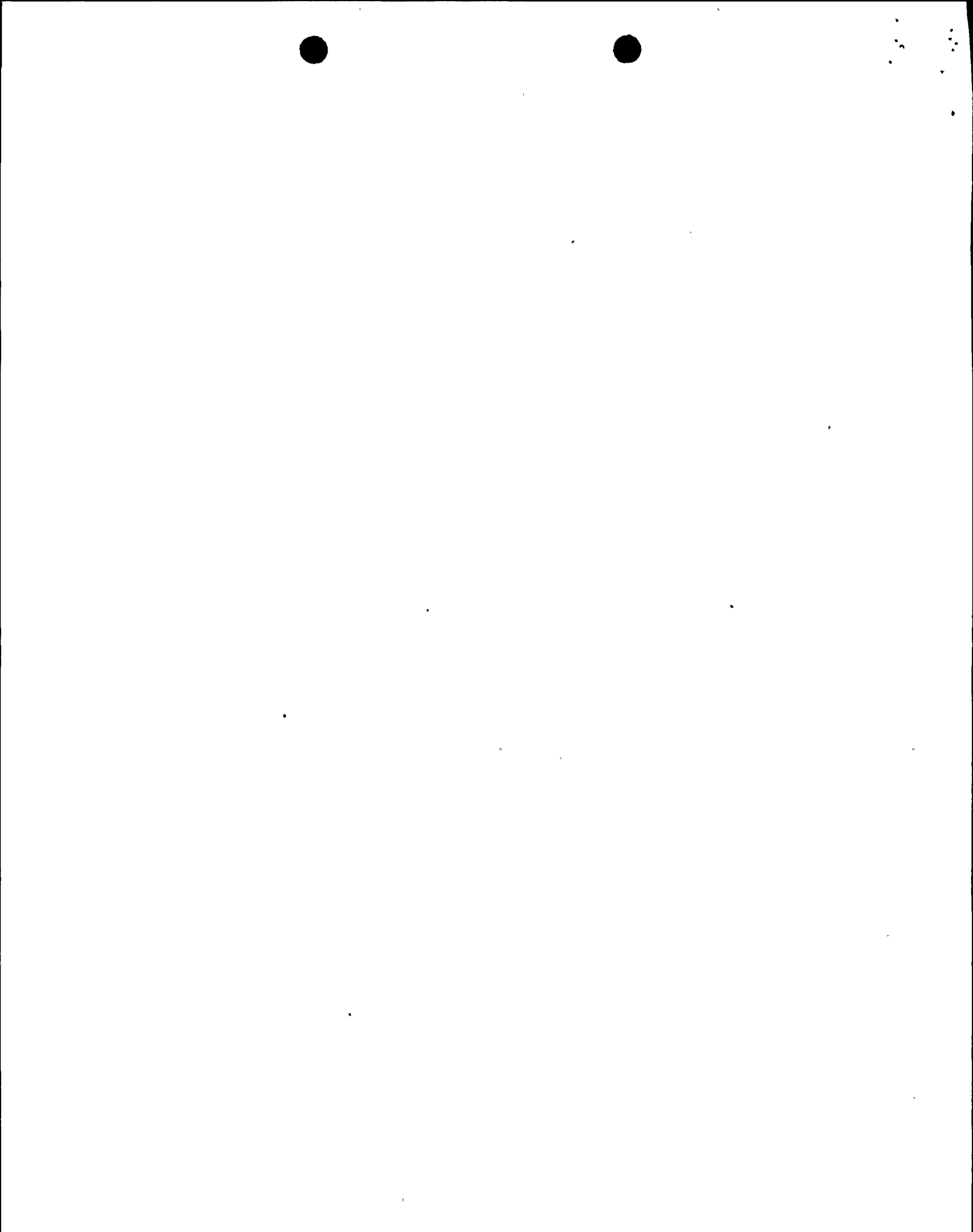
FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions Based on Generic Implications of Salem ATWS Events." This work is being conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of PWR Licensing-A by EG&G Idaho, Inc.

The U.S. Nuclear Regulatory Commission funded the work under the authorization, B&R 10-19-19-11-3, FIN No. D6001.

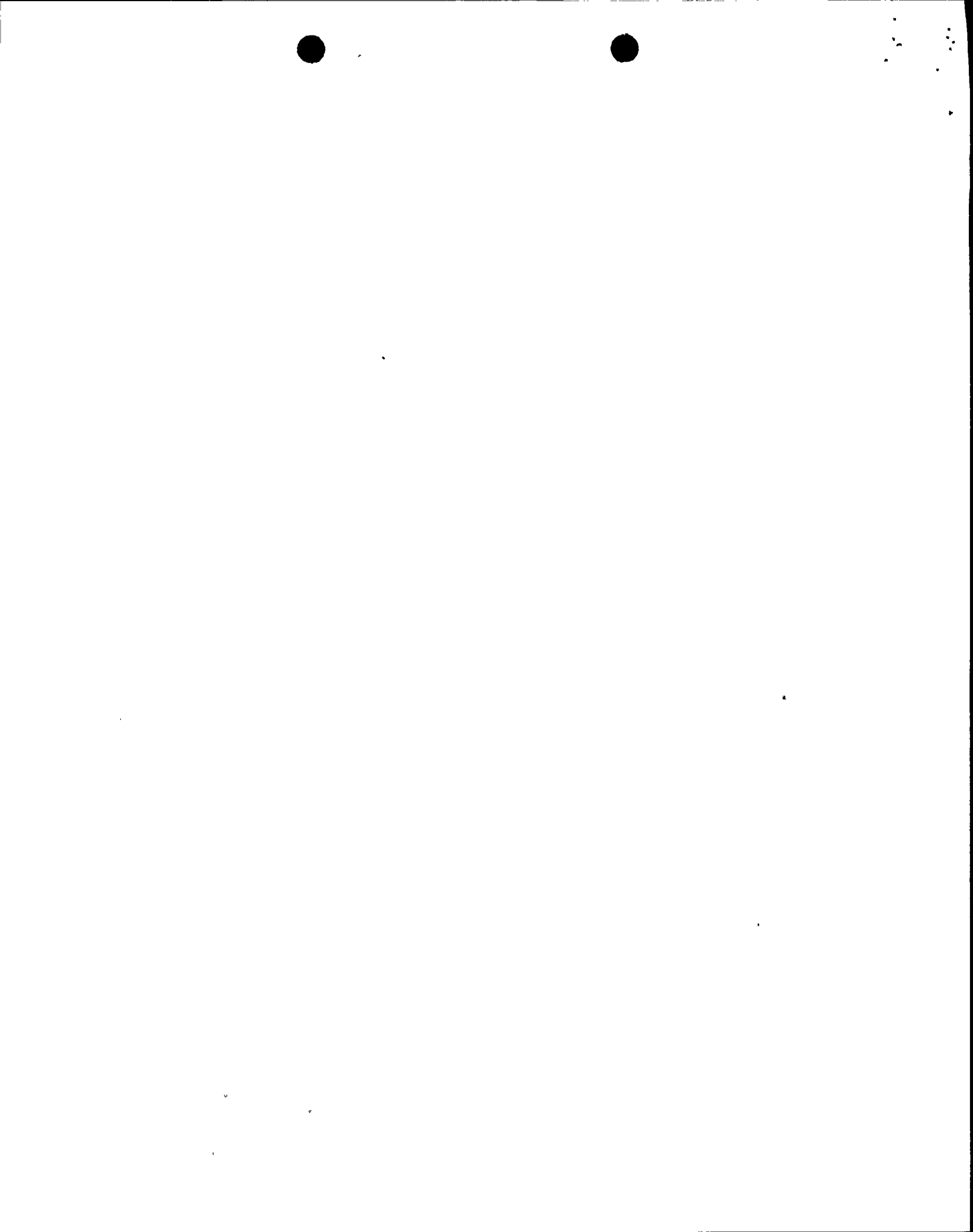
Docket Nos. 50-275 and 50-323

TAC Nos. 52994 and 53832



CONTENTS

ABSTRACT	11
FOREWORD	11
1. INTRODUCTION	1
2. REVIEW REQUIREMENTS	2
3. REVIEW RESULTS	3
3.1 Evaluation	3
3.2 Conclusion	3
4. REFERENCES	4

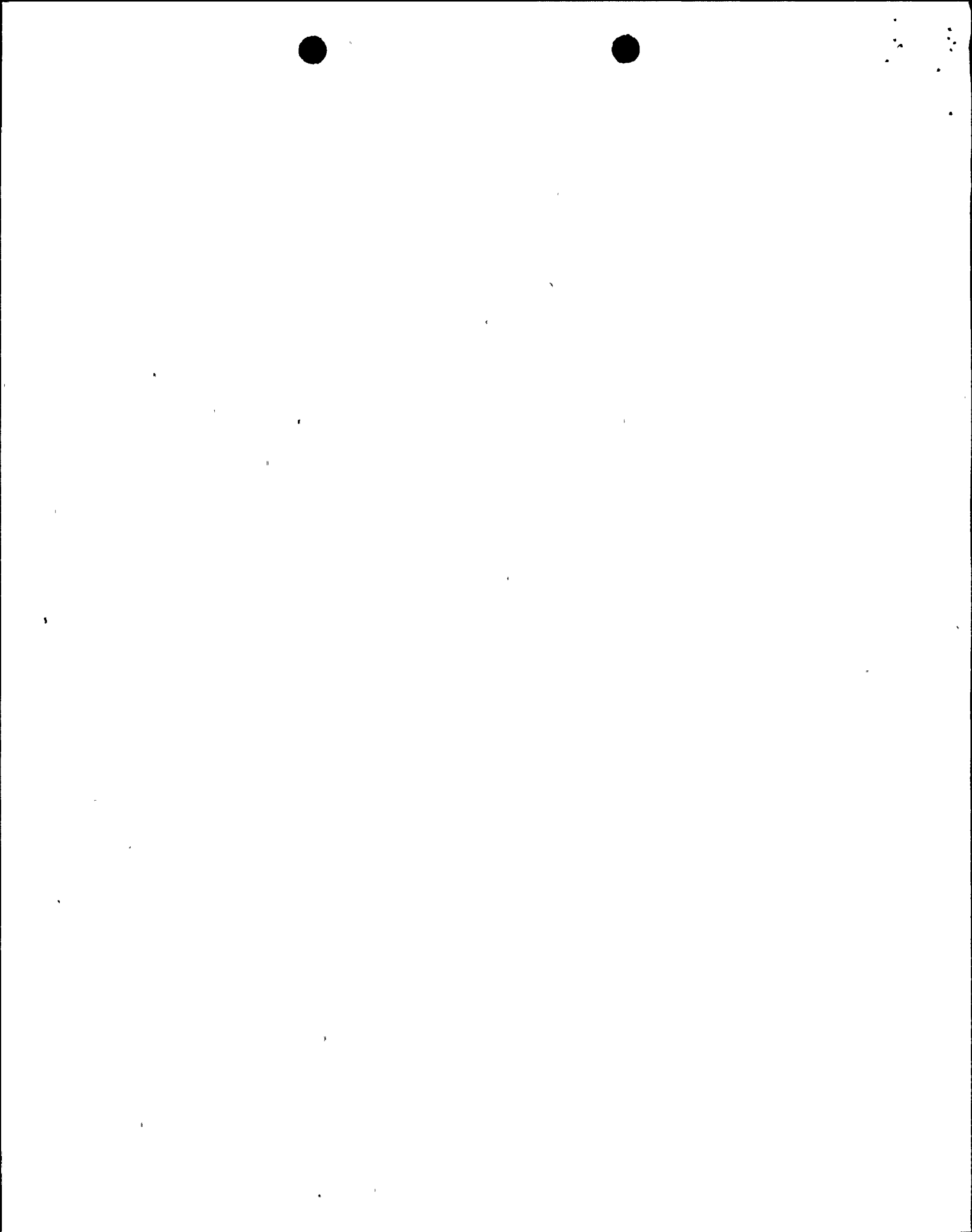


CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 and 3.2.3
DIABLO CANYON, UNIT NOS. 1 AND 2

1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28¹ was issued by D. G. Eisenhut, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on the generic implications of the Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".²

This report documents the EG&G Idaho, Inc., review of the submittals from Diablo Canyon, Unit Nos. 1 and 2 for conformance to items 3.1.3 and 3.2.3 of Generic Letter 83-28. The submittals and other documents utilized in this evaluation are referenced in Section 4 of this report.



2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements for the reactor trip system (RTS) in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

The relevant submittals for Diablo Canyon, Unit Nos. 1 and 2, were reviewed to determine compliance with items 3.1.3 and 3.2.3 of the generic letter. First, the submittals from this plant were reviewed to determine that these two items were specifically addressed. Second, the submittals were checked to determine if any post-maintenance test items specified in the technical specifications were identified that were suspected to degrade rather than enhance safety. Last, the submittals were reviewed for evidence of special conditions or other significant information relating to the two items of concern.



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

3. REVIEW RESULTS FOR DIABLO CANYON UNIT NOS. 1 AND 2

3.1 Evaluation

Pacific Gas and Electric Co., the licensee for Diablo Canyon, Unit Nos. 1 and 2, provided a response to item 3.1.3 of Letter 83-28 in their submittal dated January 2, 1985.⁴ The submittal states that Pacific Gas and Electric has not identified any post-maintenance test requirements in the Technical Specifications that significantly degrade the safety of reactor trip components.

The initial submittal did not address item 3.2.3 of the generic letter, but a later submittal dated January 24, 1985⁵ provides a schedule date for a response for this item of June 1, 1985. A submittal dated March 20, 1986⁶ provided the needed confirmation that the licensee had not identified any part-maintenance test requirements in the technical specification that degrade rather than enhance safety.

3.2 Conclusion

We find that the licensee's responses meets the requirements for items 3.1.3 and 3.2.3 and are acceptable.



4. REFERENCES

1. NRC Letter, D. G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. Letter, J. O. Schuyler, Pacific Gas and Electric Co., to D. G. Eisenhut, NRC, November 7, 1983.
4. Letter, J. D. Shiffer, Pacific Gas and Electric Co., to G. W. Knighton, NRC, January 2, 1985.
5. Letter, J. D. Shiffer, Pacific Gas and Electric Co., to G. W. Knighton, NRC, January 24, 1985.
6. Letter, J. D. Shiffer, Pacific Gas and Electric Co. to S. A. Varga, NRC, March 20, 1986.



NRC FORM 335 (2-84) NRCM 1102, 3201, 3202 BIBLIOGRAPHIC DATA SHEET SEE INSTRUCTIONS ON THE REVERSE	U.S. NUCLEAR REGULATORY COMMISSION 1 REPORT NUMBER (Assigned by TIDC add Vol No., if any) EGG-EA-7038
2. TITLE AND SUBTITLE Conformance to Generic Letter 83-28 Items 3.1.3 and 3.2.3 Diablo Canyon Site, Units 1 and 2	3 LEAVE BLANK 4 DATE REPORT COMPLETED MONTH: April YEAR: 1986
5. AUTHOR(S) R. Haroldsen	6 DATE REPORT ISSUED MONTH: April YEAR: 1986
7. PERFORMING ORGANIZATION NAME AND MAILING ADDRESS (Include Zip Code) EG&G Idaho, Inc. Idaho Falls, ID 83415	8 PROJECT/TASK/WORK UNIT NUMBER 9 FIN OR GRANT NUMBER D6001
10. SPONSORING ORGANIZATION NAME AND MAILING ADDRESS (Include Zip Code) Division of Systems Integration Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, DC 20555	11a. TYPE OF REPORT Technical Evaluation Report 11b. PERIOD COVERED (Include dates)
12. SUPPLEMENTARY NOTES	
13. ABSTRACT (200 words or less) <p style="text-align: center;">This EG&G Idaho, Inc. report provides a review of the submittals for Diablo Canyon Site, Unit Nos. 1 and 2 for conformance to Generic Letter 83-28 Items 3.1.3 and 3.2.3.</p>	
14 DOCUMENT ANALYSIS - KEYWORDS/DESCRIPTORS 15 IDENTIFIERS/OPEN-ENDED TERMS	15 AVAILABILITY STATEMENT Limited Distribution 16 SECURITY CLASSIFICATION <small>(THIS REPORT)</small> Unclassified <small>(THIS REPORT)</small> Unclassified 17 NUMBER OF PAGES 18 PRICE



14