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 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
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SUBJECT: Forwards application for amends to Licenses DPR-80 & DPR-82, consisting of License Amend Request 92-02.

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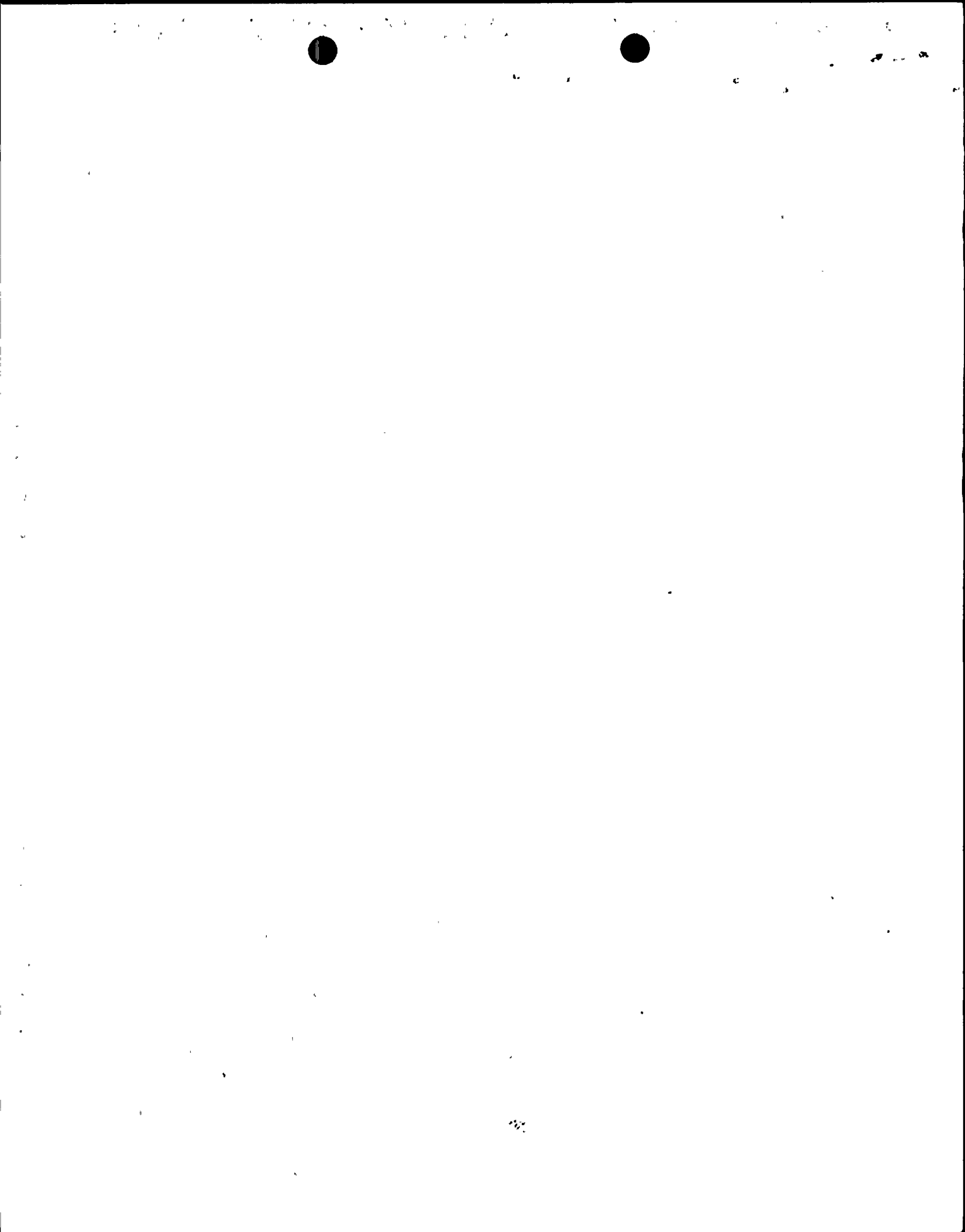
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Gregory M. Rueger
Senior Vice President and
General Manager
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February 4, 1992

PG&E Letter No. DCL-92-026



U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
License Amendment Request 92-02
Revision of Technical Specification 2.2, 3/4.1.1, 3/4.1.2,
3/4.1.3, 3/4.2.5, 3/4.3.1, 3/4.3.2, 3/4.4.2, 3/4.5.1, 3/4.5.2,
3/4.5.4, 3/4.7.1, 3/4.9.1, 3/4.10.1 - Technical Specification
Administrative Changes

Gentlemen:

Enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82. The enclosed license amendment request (LAR) proposes to administratively change the above referenced Technical Specifications (TS).

Since the changes proposed in this LAR are not required to address an immediate safety concern, PG&E believes the NRC should assign a low priority to the review of the proposed changes. PG&E requests that the revised TS be made effective immediately upon issuance of a license amendment from the NRC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregory M. Rueger'. The signature is fluid and cursive.

Gregory M. Rueger

cc: Edgar Bailey, DHS
Ann P. Hodgdon
John B. Martin
Philip J. Morrill
Harry Rood
Howard J. Wong
CPUC
Diablo Distribution

Enclosure

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ATTACHMENT A

TECHNICAL SPECIFICATION ADMINISTRATIVE CHANGES

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specifications (TS) 2.2, 3/4.1.1, 3/4.1.2, 3/4.1.3, 3/4.2.5, 3/4.3.1, 3/4.3.2, 3/4.4.2, 3/4.5.1, 3/4.5.2, 3/4.5.4, 3/4.7.1, 3/4.9.1, and 3/4.10.1, as follows:

1. Administrative changes would be made to TS 3.1.1.1, 3.1.1.2, 4.1.2.1 (and 3/4.1.2 Bases), 4.1.2.2, 3.1.2.5, 3.1.2.6, 3.1.3.4, 3.4.2.2, 3.5.1, 4.5.2, 3/4.5.4 (and 3/4.5.4 Bases), 3.7.1.6, 3.9.1, and 3.10.1. Administrative changes would also be made to TS Tables 2.2-1, 3.2-1, 3.3-1, 3.3-2, 3.3-4, 3.3-5, and 4.3-1. All of these proposed changes would remove-cycle specific information that is no longer necessary.
2. Administrative changes would be made to Table 3.3-5 to correct table notations.

The proposed changes to the TS are noted in the marked-up copy of the applicable TS (Attachment B).

B. BACKGROUND

As DCPD begins Unit 2, Cycle 5 operation, several cycle-specific TS for Units 1 and 2, will become outdated. Since these items are no longer valid, PG&E proposes to delete them from the TS. PG&E deferred removing these TS until this time, in order to minimize the number of LAR transmittals related strictly to the maintenance of the DCPD TS.

In addition to removing cycle-specific TS items, PG&E proposes to correct Table notations. Table 3.3-5, "Engineered Safety Features Response Times," provides required response times for various initiating signals. PG&E intended to change the Table notations as part of License Amendments (LA) 51 and 50. However, due to an administrative error, PG&E omitted the respective changes.

The response time for item 9.a of Table 3.3-5 currently does not reference the Table notation which includes time delays for the associated diesel generator (DG) to start and load. Current DCPD response time testing for the motor driven auxiliary feedwater pump conservatively includes these delays. Therefore, PG&E proposes to administratively add a Table notation to include time delays for the associated DG to start and load.

C. JUSTIFICATION

The proposed administrative changes to the DCPD TS remove outdated cycle-specific information. These cycle-specific TS apply to previous cycles and are therefore, no longer required.



The corrected Table 3.3-5 notations proposed in this LAR have been determined to be administrative. PG&E justified, and had intended to change, these Table notations as part of LA 51 and 50.

The Initiating Signal and Function response times for Containment Pressure-High, Phase 'A' Isolation, Component Cooling Water, and Auxiliary Salt Water Pumps response times, are not subject to the time delays associated with the sequential transfer of charging pump suction from the Volume Control Tank (VCT) to the Refueling Water Storage Tank (RWST).

Also, the Initiating Signal and Function response times for Containment Pressure-High, Auxiliary Feedwater, and Containment Fan Cooler Units response times should include the DG starting and loading time delays. Including the DG starting and loading time delays will make the DCPD TS consistent with current DCPD surveillance testing requirements.

For these reasons, PG&E proposed to change the respective Table notations. The Safety Evaluation for these changes was performed when DCPD removed the Boron Injection Tank (ref. Westinghouse Letter PGE-89-583) as part of the approved LA 51 and 50.

In addition, the Initiating Signal and Function response times for Steam Generator Water Level Low-Low in Table 3.3-5 should include Table notation "3". This response time currently does not reference the Table notation which includes time delays for the associated DG to start and load. Current DCPD response time testing for the motor driven auxiliary feedwater pump conservatively includes these delays. The administrative addition of this Table notation is a conservative change which reflects the current operating conditions at DCPD.

D. SAFETY EVALUATION

The deletion of cycle-specific TS is an administrative change. Since the proposed changes have no effect on any plant systems or the safe operation of DCPD, they are not considered to have any safety significance. They do, however, clarify the TS by removing extraneous information.

The proposed changes to the Table 3.3-5 notations reflect the current operating conditions at DCPD. Further, the proposed changes have been determined to have no effect on any plant system or safety function.

In conclusion, PG&E believes there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed TS change.

E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazards considerations involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph



50.21(b) or paragraph 50.22 or a testing facility involves no significant hazards considerations, if operation of the facility in accordance with the proposed amendment 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 following evaluation is provided for the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The TS revisions proposed in this LAR do not change the operating methodology of DCP. The proposed administrative changes delete cycle-specific TS and correct Table notations.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed revisions to the DCP TS are administrative in nature. Further, the proposed changes would not result in any physical alteration to any plant system, and there would not be a change in the method by which any safety-related system performs its function.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed administrative changes clarify the DCP TS by deleting cycle-specific TS and correcting Table notations. In addition, the proposed changes have no effect on the current operating methodologies or actions which govern plant performance.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.



F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PG&E concludes that the changes proposed by this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards finding is justified.

G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.



ATTACHMENT B

MARKED-UP TECHNICAL SPECIFICATIONS

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