CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9606260202 DOC.DATE: 96/05/31 NOTARIZED: YES DOCKET #
FACIL:50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
AUTH.NAME AUTHOR AFFILIATION
RUEGER,G.M. Pacific Gas & Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

See Proposed Change to Tech Specs

SUBJECT: Forwards application for amends to licenses DPR-80 & DPR-82, revising TS to support extended fuel cycles to 24 months.

DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 2+73
TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD4-2 LA	1	1	PD4-2 PD	1	1
	BLOOM,S	1	1			
INTERNAL:	ACRS	1	1	FILE CENTER 01	1	1
	NRR/DE/EMCB	1	1	NRR/DRCH/HICB	1	1
	NRR/DSSA/SPLB	1	1	NRR/DSSA/SRXB	1	1
	NUDOCS-ABSTRACT	1	1	OGC/HDS3	1	0
EXTERNAL:	NOAC	1	1	NRC PDR	1	1

C A T E G O R Y 1 D O C U M E N T

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM OWFN 5D-5(EXT. 415-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 13 ENCL 12

Pacific Gas and Electric Company

245 Market Street, Room 937-N9B
San Francisco, CA 94105
Mailing Address
Mail Code N9B
P.O. Box 770000
San Francisco, CA 94177
415/973-4684 Fax 415/973-2313

Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

May 31, 1996

PG&E Letter DCL-96-129

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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
License Amendment Request 96-09
Revision of Technical Specifications to Support
Extended Fuel Cycles to 24 Months

Dear Commissioners and Staff:

Enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant (DCPP). This License Amendment Request (LAR) is the second in a series planned for submittal over a one-year period to support the first extended fuel cycle at DCPP. As part of the first LAR (LAR 96-04, PG&E Letter DCL-96-052, dated February 14, 1996), PG&E proposed a new frequency notation for 24-month intervals and provided evaluations for several Technical Specification (TS) surveillance extensions. This LAR proposes to: (1) change the surveillance frequency for 23 TS from at least once every 18 months to at least once per refueling interval (nominally 24 months), and (2) make administrative changes for 6 TS to maintain consistency for TS items that are not proposed for surveillance extension.

The specific TS changes requested in this LAR include 2 response time tests, 3 containment spray system tests, and 24 ventilation system tests. The changes have been evaluated in accordance with the guidance provided in Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," and are a part of those necessary to support implementation of extended fuel cycles at DCPP.

This LAR is composed of four attachments. Attachment A provides an overview of the affected TS, relationship to other previously submitted LARs, a no significant hazards determination, and an environmental evaluation. Attachment B provides marked-up TS. Attachment C provides proposed new TS

A001 1/1

pages. Attachment D provides detailed safety evaluations for each of the 29 proposed TS changes.

The first extended cycle is presently scheduled to be a 21-month cycle for Unit 2 beginning in May 1996 and ending in January 1998 (Unit 2 Cycle 8). For Unit 2 Cycle 8, the 18-month point in the cycle will occur in October 1997, at which time the end of the 18-month TS surveillance intervals will be reached. PG&E presently plans to submit the final LAR needed to support extension of Unit 2 Cycle 8 in December 1996.

The proposed changes are not required to address an immediate safety concern. However, PG&E has conservatively decided to pursue revision of the impacted refueling frequency TS to avoid use of surveillance interval extensions for a 21-month cycle; in support of this determination, PG&E requests approval by July 1997. Therefore, PG&E requests that the NRC review this LAR on a medium priority. PG&E also requests that the TS changes requested in this LAR be effective upon issuance of the license amendment, with the provision that PG&E implement the changes within 90 days.

Sincerely,

Gregory M. Rueger

cc: Edgar Bailey, DHS
Steven D. Bloom
L. J. Callan
Kenneth E. Perkins
Michael D. Tschiltz
Diablo Distribution

Enclosures

REVISION OF SURVEILLANCE INTERVALS FOR VARIOUS TECHNICAL SPECIFICATIONS TO SUPPORT EXTENDED FUEL CYCLES

A. DESCRIPTION OF AMENDMENT REQUEST

This License Amendment Request (LAR) is the second in a series planned for submittal over a one-year period to support the first extended fuel cycle at Diablo Canyon Power Plant (DCPP) Units 1 and 2. As part of the first LAR (LAR 96-04, PG&E Letter DCL-96-052, dated February 14, 1996), PG&E proposed a new frequency notation for 24-month intervals that will be used in this LAR. This LAR proposes to revise various Technical Specifications (TS) to support implementation of extended fuel cycles at DCPP.

Six TS surveillance requirements would receive administrative changes to maintain consistency for TS items that are not proposed for surveillance extension:

Item	Technical Specification
7.	TS 4.7.5.1c.2), Plant Systems - Control Room Ventilation System
9.	TS 4.7.5.1d., Plant Systems - Control Room Ventilation System
15.	TS 4.7.6.1b.2), Plant Systems - Auxiliary Building Safeguards Air Filtration System
17.	TS 4.7.6.1c., Plant Systems - Auxiliary Building Safeguards Air Filtration System
24.	TS 4.9.12b.3), Refueling Operations - Fuel Handling Building Ventilation System
26.	TS 4.9.12c., Refueling Operations - Fuel Handling Building Ventilation System

The surveillance frequencies for 23 TS surveillance requirements would be changed from 18- to 24-months:

Item	Technical Specification
1.	TS 4.3.1.2, Instrumentation - Reactor Trip System Instrumentation, Response Time
2.	TS 4.3.2.2, Instrumentation - Engineered Safety Features Actuation System Instrumentation, Response Time
3.	TS 4.3.2.1, Table 4.3-2 (Functional Unit 2.a), Instrumentation - Engineered Safety Features Actuation System Instrumentation, Containment Spray, Manual Initiation
4.	TS 4.6.2.1c.1), Containment Systems - Depressurization and Cooling Systems - Containment Spray System, Automatic Valves
5.	TS 4.6.2.1c.2), Containment Systems - Depressurization and Cooling Systems - Containment Spray System, Automatic Pump Starts
6.	TS 4.7.5.1c.1), Plant Systems - Control Room Ventilation System
8.	TS 4.7.5.1c.3), Plant Systems - Control Room Ventilation System
10.	TS 4.7.5.1e.1), Plant Systems - Control Room Ventilation System
11.	TS 4.7.5.1e.2), Plant Systems - Control Room Ventilation System
12.	TS 4.7.5.1e.3), Plant Systems - Control Room Ventilation System
13.	TS 4.7.5.1e.4), Plant Systems - Control Room Ventilation System
14.	TS 4.7.6.1b.1), Plant Systems - Auxiliary Building Safeguards Air Filtration System
16.	TS 4.7.6.1b.3), Plant Systems - Auxiliary Building Safeguards Air Filtration System
18.	TS 4.7.6.1d.1), Plant Systems - Auxiliary Building Safeguards Air Filtration System
19.	TS 4.7.6.1d.2), Plant Systems - Auxiliary Building Safeguards Air Filtration System

20. TS 4.7.6.1d.3), Plant Systems - Auxiliary Building Safeguards Air Filtration System

21. TS 4.7.6.1d.4), Plant Systems - Auxiliary Building Safeguards Air Filtration System

22. TS 4.9.12b.1), Refueling Operations - Fuel Handling Building Ventilation System

23. TS 4.9.12b.2), Refueling Operations - Fuel Handling Building Ventilation System

25. TS 4.9.12b.4), Refueling Operations - Fuel Handling Building Ventilation System

27. TS 4.9.12d.1), Refueling Operations - Fuel Handling Building Ventilation System

28. TS 4.9.12d.2), Refueling Operations - Fuel Handling Building Ventilation System

29. TS 4.9.12d.3), Refueling Operations - Fuel Handling Building Ventilation System

Changes to the TS are noted in the marked-up copy of the applicable TS pages provided in Attachment B. The new proposed TS pages are provided in Attachment C. An item-specific safety and no significant hazards evaluation for each proposed TS change is provided in Attachment D.

B. BACKGROUND

PG&E has completed detailed studies to evaluate the feasibility of increasing the length of fuel cycles for DCPP Units 1 and 2 to 24 months. Based on the results of these studies, PG&E has concluded that 24-month fuel cycles are feasible and desirable for DCPP.

PG&E plans to initiate extended cycles in the spring of 1996. Cycle 8 for Unit 2, scheduled to begin in May 1996, and Cycle 9 for Unit 1, scheduled to begin in May 1997, will be the first extended cycles in each unit. The first three extended cycles in each unit are presently planned to be 21, 20, and 19 months in duration, respectively. These cycles offer economic benefits, smoother transition to 24-month cycles, and are bounded by current analyses. The 24-month cycles are scheduled to begin in 2001. Additional analyses will be required to support implementation of the 24-month cycles.

To gain the desired efficiencies associated with extended fuel cycles, refueling outage TS surveillance intervals must be increased. Generic guidance for licensees preparing LARs to increase surveillance intervals in support of 24-month cycles was issued by the NRC in Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle." In preparing this LAR, PG&E has evaluated each proposed surveillance interval increase in accordance with GL 91-04.

Guidance is also provided in GL 91-04 on the specific definitions to be used to define extended fuel cycles. PG&E proposed addition of these definitions to the TS in the first submittal of this series, LAR 96-04.

C. TECHNICAL SPECIFICATION PAGES AFFECTED BY PREVIOUSLY SUBMITTED LARs

Several of the TS items included in this LAR are also the subject of, or their pages are affected by, previously submitted LARs. Each of the pending TS changes were evaluated with respect to this LAR and found not to conflict. Table 1 identifies the TS pages, previous LARs, and submittal dates. Issuance of License Amendments (LA) for the LARs listed in the table would require submittal of revised TS pages for this LAR.

TABLE 1: TS PAGES AFFECTED BY PREVIOUS LARs

TS PAGE	LAR
3/4 3-1	none
3/4 3-14	none
3/4 3-32	94-11, Slave Relay Test Extension, November 14, 1994 96-04, Extended Fuel Cycles, February 2, 1996 96-07, Containment Spray Initiating Signals, May 9, 1996
3/4 6-11	96-07, Containment Spray Initiating Signals, May 9, 1996
3/4 7-14	96-06, Testing Methodologies for Filters, April 3, 1996
3/4 7-15	none
3/4 7-16	none
3/4 7-17	96-06, Testing Methodologies for Filters, April 3, 1996
3/4 9-13	96-06, Testing Methodologies for Filters, April 3, 1996
3/4 9-14	96-06, Testing Methodologies for Filters, April 3, 1996

The containment spray (CS) TS (Items 3, 4, and 5) are the subject of previously submitted LAR 96-07, "Containment Spray Initiation Signals," (PG&E Letter DCL 96-089, dated May 9, 1996). LAR 96-07 proposes to revise the description of the initiating signal for operation of CS components. These changes provide consistency, clarify CS initiation signals, and conform to the description provided in Revision 1 of NUREG-1431, "Improved Standard Technical Specifications -

Westinghouse Plants." LAR 96-07 does not add or delete any TS required testing.

Instrumentation section TS page 3/4 3-32 is affected by two other LARs. First, the slave relay test extension LAR 94-11 (PG&E Letter 94-254, dated November 14, 1994) proposes to revise the slave relay test frequency for Table 4.3-2 Functional Units 1.b. and 2.b. Slave relay testing is independent of testing performed to verify the CS manual initiation function for Functional Unit 2.a. Second, the first 24-month fuel cycle LAR 96-04 (PG&E Letter DCL-96-052, dated February 14, 1996) proposed to extend safety injection surveillances and did not address or affect the CS section of this page.

Several of the ventilation system TS are the subject of previously submitted LAR 96-06 regarding testing methodologies for filters (PG&E Letter DCL-96-085, dated April 3, 1996). The affected Items are: 6, 7, and 9 for the control room ventilation system; 14, 15, and 17 for the auxiliary building ventilation system; and 23, 24, and 26 for the fuel handling building ventilation system. LAR 96-06 proposes to clarify the standards to which ventilation testing is performed and does not add or delete any TS required testing.

This LAR was prepared under the assumption that LAR 96-06, regarding filter testing, would be approved as submitted and license amendments issued accordingly. The revisions in ventilation testing standards proposed by LAR 96-06 are consistent with the testing currently performed at DCPP and evaluated in Attachment D of this LAR. If LAR 96-06 is significantly revised or has not been approved prior to approval of this LAR, an additional submittal will be required to appropriately revise the testing standards referenced.

D. JUSTIFICATION

The changes proposed in this LAR are required to support implementation of extended cycles at DCPP. The primary benefits of extended cycles will be fewer refuelings, improved outage scheduling, and reduced personnel dose and radwaste.

The proposed administrative changes and surveillance interval increases have been evaluated in accordance with the guidance of GL 91-04 and are similar to changes recently approved for Indian Point 2 and 3 and proposed for Millstone 3.

E. SAFETY EVALUATION

Safety evaluations for each of the 29 proposed TS changes are provided in Attachment D. These evaluations have been performed in accordance with the guidance provided in GL 91-04.

For the 23 proposed changes involving surveillance interval increases from 18 to 24 months, historical plant maintenance and surveillance data have been evaluated and shown to support each proposed surveillance increase. The assumptions in the plant licensing basis are not invalidated by performing these surveillances at the bounding interval limit of 30 months.

The six proposed administrative changes in ventilation system TS maintain consistency for TS items that are not proposed for surveillance extension. For each ventilation system, two surveillances requiring laboratory carbon testing were combined into one. The testing frequencies and conditions were maintained unchanged.

In all cases, PG&E has concluded that the proposed TS changes will not adversely affect the health and safety of the public.

F. 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."*

No significant hazards evaluations for each of the 29 proposed TS changes are provided in Attachment D. The proposed changes include 6 administrative changes and 23 surveillance interval increases from 18 to 24 months. The following summarizes the no significant hazards considerations for the 29 proposed TS changes.

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

The six administrative changes regarding laboratory carbon testing are administrative changes only and do not affect the probability or consequences of accidents.

The 23 proposed TS surveillance interval increases from 18 to 24 months do not alter the intent or method by which the inspections, tests, or verifications are conducted, do not alter the way any structure, system, or component functions, and do not change the manner in which the plant is operated. The surveillance, maintenance, and operating histories indicate that the equipment will continue to perform satisfactorily with longer surveillance intervals. No recurring surveillance or maintenance problems were identified for response time, containment spray system, or control room ventilation system testing.

Recurring maintenance issues on the fuel handling building and auxiliary building ventilation systems regarding the system control panels and certain dampers have been addressed. These ventilation systems are in service during all modes of operation and experience normal wear. None of the problems are related to refueling frequency testing. The monthly surveillance tests provide assurance of system operability for the control panels. The preventive maintenance program for the dampers is independent of refueling shutdowns and provides assurance that degradation mechanisms such as corrosion and wear are adequately addressed.

There are no known mechanisms that would significantly degrade the performance of the evaluated equipment during normal plant operation. All potential time-related degradation mechanisms have insignificant effects in the timeframe of interest (maximum of 30 months). Based on the past performance of the equipment, the probability or consequences of accidents would not be significantly affected by the proposed surveillance interval increases.

Therefore, the proposed changes do 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 six administrative changes regarding laboratory carbon testing are administrative changes only and do not affect the type of accidents possible.

The containment spray system and control room, auxiliary building, and fuel handling building ventilation systems are not associated with the initiation of any accident. The reactor trip and engineered safety feature actuation system response times are assumed in the accident analysis. However, the proposed surveillance interval increases would not affect the type of accidents possible.

For the 23 proposed TS changes involving surveillance interval increases from 18- to 24-months, the surveillance and maintenance histories indicate that the equipment will continue to effectively perform their respective design functions over the longer operating cycles. Additionally, the increased surveillance intervals do not result in any physical modifications, affect safety function performance or the manner in which the plant is operated, or alter the intent or method by which surveillance tests are performed. Only a few problems have been identified and generally have not recurred. All potential time-related degradations have insignificant effects in the timeframe of interest.

Therefore, the proposed changes do 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 six administrative changes regarding laboratory carbon testing are administrative changes only and do not affect the margin of safety.

For the 23 proposed TS changes involving 18- to 24-month surveillance interval increases, evaluation of historical surveillance and maintenance data indicates there have been only a few problems experienced with the evaluated equipment. There are no indications that potential problems would be cycle-length dependent or that potential degradation would be significant for the timeframe of interest; therefore, increasing the surveillance interval will have little, if any, impact on any margin of safety. There is no safety analysis impact since these changes will have no effect on any safety limit, protection system setpoint, or limiting condition for operation, and there are no hardware changes that would impact existing safety analysis acceptance criteria. Safety margins would not be significantly affected by the proposed surveillance interval increases.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

G. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the Attachment D evaluations as summarized above, PG&E concludes that the activities associated with this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards finding is justified.

H. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined that 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 effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical restriction 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.