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*See Request
Change To
Tech Specs*

SUBJECT: Forwards amends to licenses DPR-80 & DPR-82, changing surveillance frequency for several TS from at least once every 18 months to at least once per refueling interval.

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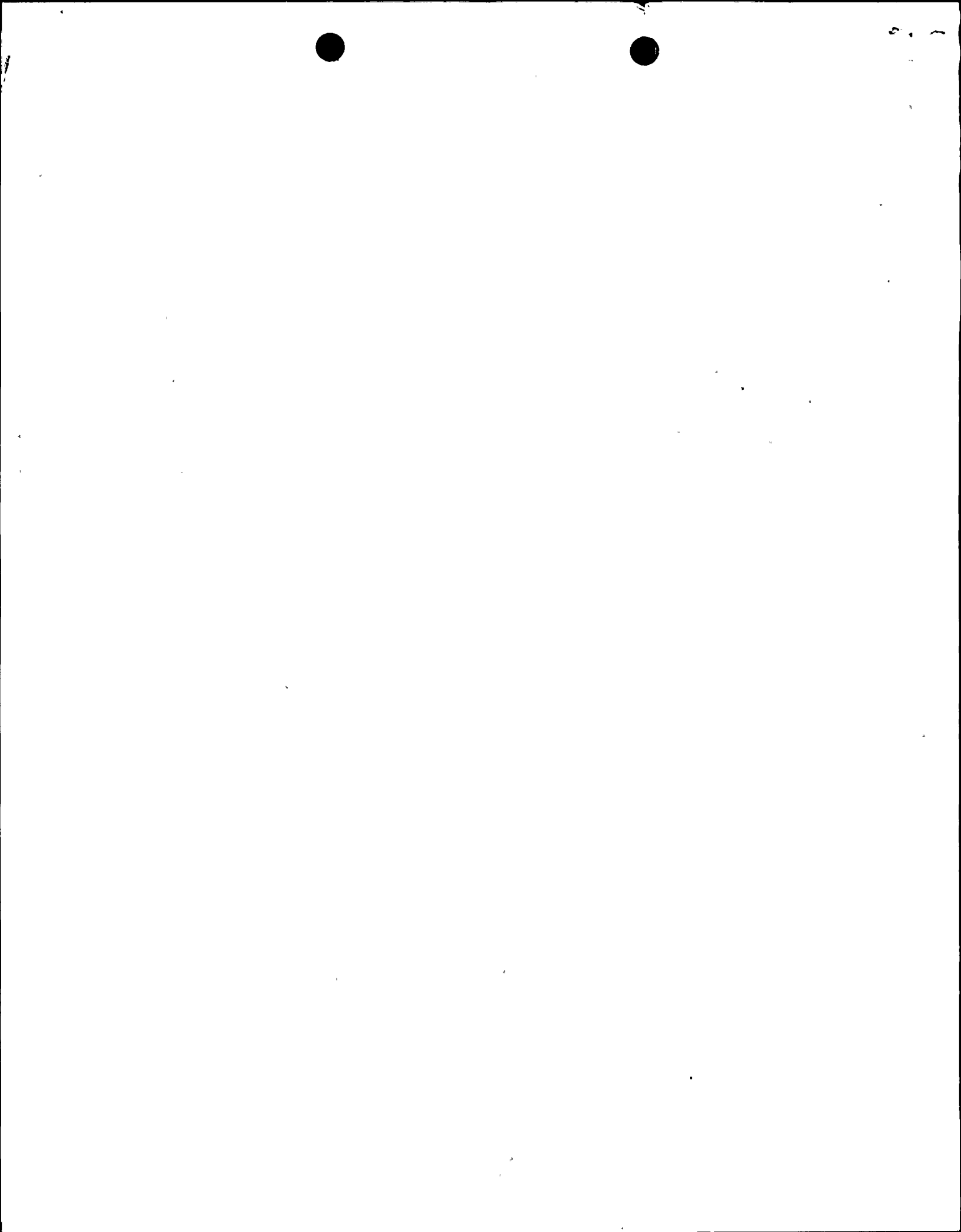
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February 14, 1997

PG&E Letter DCL-97-021



U.S. Nuclear Regulatory Commission
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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 97-01
Revision of Technical Specifications to Support
Extended Fuel Cycles to 24 Months: Submittal #4

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 fourth in a series planned for submittal to support the DCPP 24-month cycle plans.

This LAR proposes to change the surveillance frequency for several Technical Specifications (TS) from at least once every 18 months to at least once per refueling interval (to be defined as 24 months). The requested TS surveillance interval increases include those for 8 slave relay tests, 20 electrical system tests and 1 electrical TS Bases change, and 5 miscellaneous tests. The surveillance extensions use the frequency notation proposed in the first 24-month LAR, (LAR 96-04, PG&E Letter DCL-96-052, dated February 14, 1996).

These changes were 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 part of those necessary to support implementation of extended fuel cycles at DCPP.

This LAR is composed of one enclosure with 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

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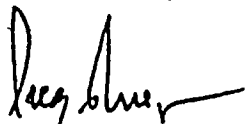


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proposed new TS pages. Attachment D provides item-specific safety evaluations for each of the proposed TS changes.

As discussed previously with the NRC, PG&E plans to use three transition cycles prior to converting DCCP to 24-month fuel cycles. The first transition cycle, Unit 2 Cycle 8, is a 21-month cycle that began in May 1996 and is scheduled to end in January 1998. PG&E proposes to use the 24-month cycle surveillance interval extensions to support the transition cycles. This conservative approach is intended to avoid the use of the 25 percent allowance for surveillance extension during the transition cycles. For Unit 2 Cycle 8, the 18-month surveillances will be due by October 1997, 18 months into the cycle. Therefore, PG&E requests that the NRC review the 24-month cycle LARs on a medium priority and approve them by July 1997. 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
James E. Dyer
Kenneth E. Perkins
Michael D. Tschiltz
Diablo Distribution

Enclosures

VAB/2057



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TABLE OF CONTENTS

<u>ATTACHMENT</u>	<u>SUBJECT</u>	<u>PAGE</u>
A	License Amendment Request	A-2
B	Marked-up Technical Specification Pages	B-1
C	Proposed Technical Specification Pages	C-1
D	Item-specific Safety Evaluations	D-1

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ATTACHMENT A

REVISION OF SURVEILLANCE INTERVALS FOR VARIOUS TECHNICAL SPECIFICATIONS TO SUPPORT EXTENDED FUEL CYCLES: SUBMITTAL #4

A. DESCRIPTION OF AMENDMENT REQUEST

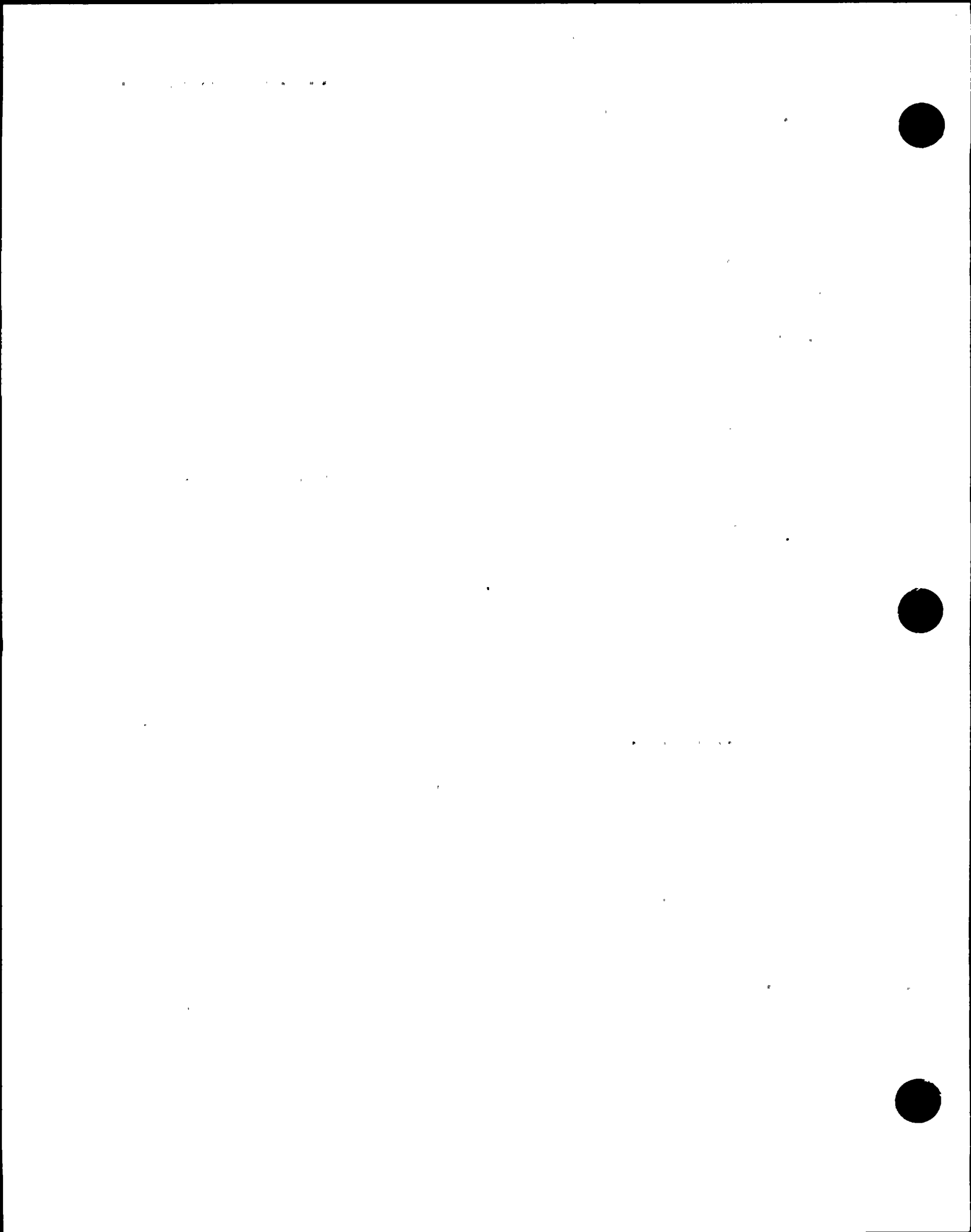
This license amendment request (LAR) is the fourth in a series planned for submittal to support the first extended fuel cycle at Diablo Canyon Power Plant (DCPP), Units 1 & 2.

This LAR proposes to extend the surveillance frequencies for 33 Technical Specifications (TS) items, including 8 slave relay tests, 5 miscellaneous tests, and 20 electrical system tests. One electrical TS Bases would also be revised to clarify battery testing standards. These changes were evaluated in accordance with the guidance provided in Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," and are part of those necessary to support implementation of extended fuel cycles at DCPP.

As part of the first LAR in support of 24-month fuel cycles (LAR 96-04, PG&E Letter DCL-96-052, dated February 14, 1996), PG&E proposed a new frequency notation for 24-month intervals, which will be used in this LAR. This new notation would be "R24, REFUELING INTERVAL," with a frequency of "at least once per 24 months." The notation "R24" was proposed for usage in the TS tables to differentiate those surveillances which would be extended from those that have not been evaluated or do not warrant extension. Therefore, the surveillance frequency for the specified channels would be extended from "R," defined as once per 18 months, to "R24," defined as at least once per 24 months. This will allow clear differentiation between 24-month and 18-month surveillance intervals.

Additionally, PG&E is proposing that the words "during shutdown" be removed from applicable emergency diesel generator (EDG) and station battery TS in accordance with guidance provided in GL 91-04. The GL states that licensees may omit the TS qualification that a surveillance is to be performed "during shutdown." This change affects Items 17, 20, 35, 36, and 37 as listed below.

One power operated relief valve (PORV) TS surveillance requirement (Item 11) would receive administrative changes to maintain consistency for TS items that are not proposed for surveillance extension in this LAR. PG&E expects to propose this TS for extension in a subsequent submittal with other channel calibration items requiring drift analysis.



One TS Bases change (Item 38) is proposed to provide an exception to the 18-month recommendation for battery service life testing provided in the standards to which DCPD is committed.

PG&E is also proposing to extend the surveillance interval for the pressurizer heater capacity TS surveillance requirement (Item 9) from at least once per 92 days to at least once per REFUELING INTERVAL, in accordance GL 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation." The electric capacity surveillance requirement extension was identified during PG&E's work on the Standard Technical Specification conversion project.

The surveillance frequencies for the following 33 TS surveillance requirements would be changed to 24 months:

NOTE: The "Item" numbers refer to the designations used throughout this submittal for each TS change. Items are numbered in the order of their appearance in the TS.

<u>Item</u>	<u>Technical Specification</u>
1.	TS 4.3.2.1, Table 4.3-2, Engineered Safety Features Actuation System (ESFAS) Instrumentation; Functional Unit 1.b., Safety Injection, Automatic Actuation Logic and Actuation Relays - Slave Relay Test
2.	TS 4.3.2.1, Table 4.3-2, ESFAS Instrumentation; Functional Unit 2.b., Containment Spray, Automatic Actuation Logic and Actuation Relays - Slave Relay Test
3.	TS 4.3.2.1, Table 4.3-2, ESFAS Instrumentation; Functional Unit 3.a.2), Containment Isolation, Phase A Isolation, Automatic Actuation Logic and Actuation Relays - Slave Relay Test
4.	TS 4.3.2.1, Table 4.3-2, ESFAS Instrumentation; Functional Unit 3.b.2), Containment Isolation, Phase B Isolation, Automatic Actuation Logic and Actuation Relays - Slave Relay Test
5.	TS 4.3.2.1, Table 4.3-2, ESFAS Instrumentation; Functional Unit 3.c.1), Containment Isolation, Containment Ventilation Isolation, Automatic Actuation Logic and Actuation Relays - Slave Relay Test
6.	TS 4.3.2.1, Table 4.3-2, ESFAS Instrumentation; Functional Unit 4.b., Steam Line Isolation, Automatic Actuation Logic and Actuation Relays - Slave Relay Test

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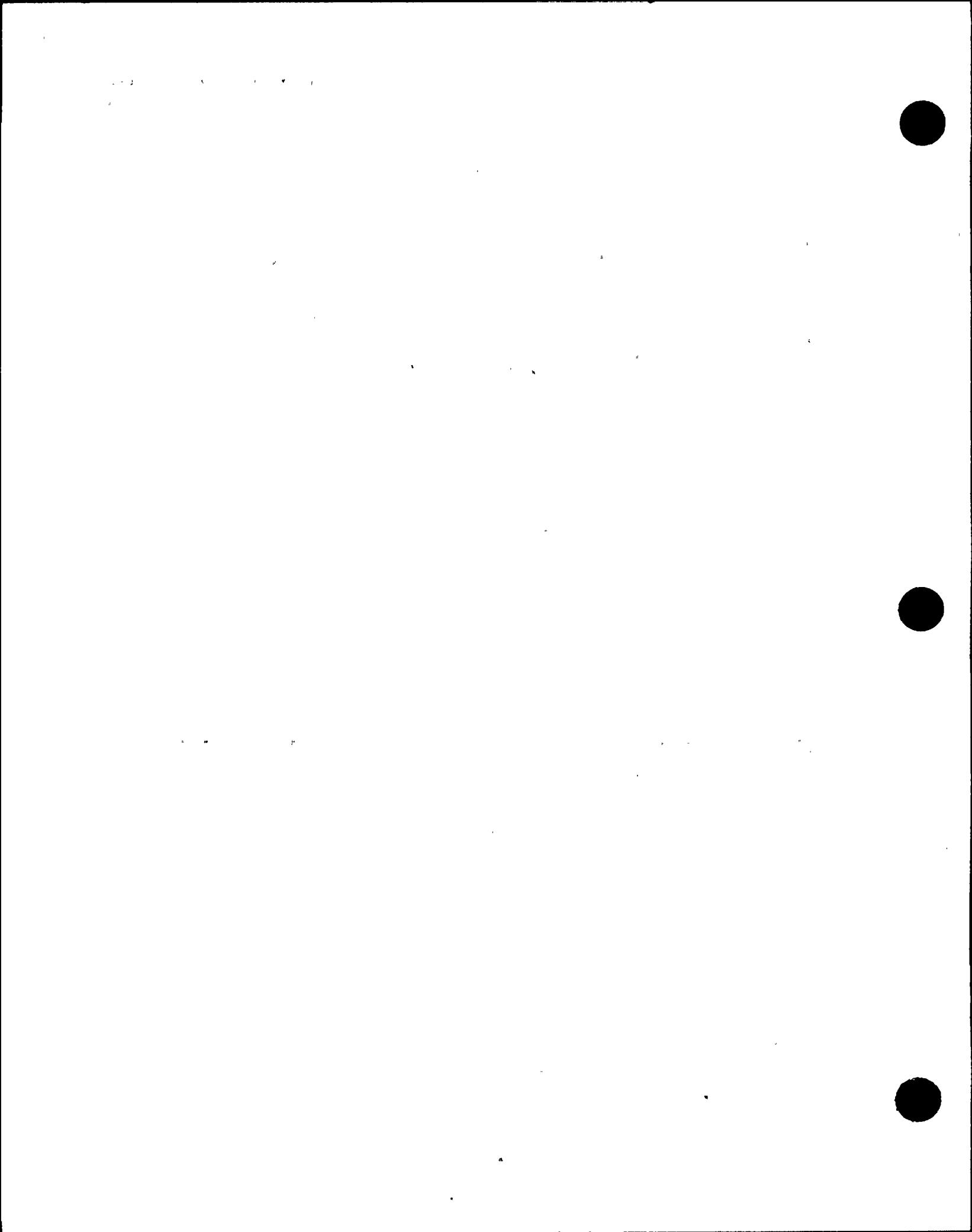
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7. TS 4.3.2.1, Table 4.3-2, ESFAS Instrumentation; Functional Unit 5.a., Turbine Trip and Feedwater Isolation, Automatic Actuation Logic and Actuation Relays - Slave Relay Test
8. TS 4.3.2.1, Table 4.3-2, ESFAS Instrumentation; Functional Unit 6.b., Auxiliary Feedwater, Automatic Actuation Logic and Actuation Relays - Slave Relay Test
9. TS 4.4.3.2, Reactor Coolant System (RCS), Pressurizer, pressurizer heater capacity
10. TS 4.4.4.1a., RCS, Relief Valves, PORVs
12. TS 4.4.4.3a., RCS, Relief Valves, safety-related nitrogen supply for the PORVs
13. TS 4.4.4.3b., RCS, Relief Valves, safety-related nitrogen supply for the PORVs
14. TS 4.4.4.3c., RCS, Relief Valves, safety-related nitrogen supply for the PORVs
15. Deleted.
16. Deleted.
17. TS 4.8.1.1.1b., Electrical Power Systems - A.C. Sources, bus transfers, revise "18 months during shutdown" to "REFUELING INTERVAL," deleting the requirement to only perform the surveillance during shutdown
18. TS 4.8.1.1.1b.1), Electrical Power Systems - A.C. Sources, bus transfers
19. TS 4.8.1.1.1b.2), Electrical Power Systems - A.C. Sources, bus transfers
20. TS 4.8.1.1.2b., Electrical Power Systems - A.C. Sources, EDGs, revise "18 months during shutdown" to "REFUELING INTERVAL," deleting the requirement to only perform the surveillance during shutdown
21. TS 4.8.1.1.2b.1), Electrical Power Systems - A.C. Sources, EDGs
22. TS 4.8.1.1.2b.2), Electrical Power Systems - A.C. Sources, EDGs



23. TS 4.8.1.1.2b.3), Electrical Power Systems - A.C. Sources, EDGs
24. TS 4.8.1.1.2b.4), Electrical Power Systems - A.C. Sources, EDGs
25. TS 4.8.1.1.2b.5) parts a) and b), Electrical Power Systems - A.C. Sources, EDGs
26. TS 4.8.1.1.2b.6), Electrical Power Systems - A.C. Sources, EDGs
27. TS 4.8.1.1.2b.7) parts a), b), and c), Electrical Power Systems - A.C. Sources, EDGs
28. TS 4.8.1.1.2b.8), Electrical Power Systems - A.C. Sources, EDGs
29. TS 4.8.1.1.2b.9), Electrical Power Systems - A.C. Sources, EDGs
30. TS 4.8.1.1.2b.10), parts a), b), and c), Electrical Power Systems - A.C. Sources, EDGs
31. TS 4.8.1.1.2b.11), Electrical Power Systems - A.C. Sources, EDGs
32. TS 4.8.1.1.2b.12) parts a), b), c), and d), Electrical Power Systems - A.C. Sources, EDGs
33. TS 4.8.1.1.2e., Electrical Power Systems - A.C. Sources, EDGs
34. TS 4.8.3.1c., parts 1), 2), 3), and 4), Electrical Power Systems - D.C. Sources, batteries
35. TS 4.8.3.1d., Electrical Power Systems - D.C. Sources, batteries, revise "18 months, during shutdown" to "REFUELING INTERVAL," deleting the requirement to only perform the surveillance during shutdown
37. TS 4.8.3.1f., Electrical Power Systems - D.C. Sources, batteries, revise "18 months during shutdown" to "REFUELING INTERVAL," deleting the requirement to only perform the surveillance during shutdown.



One TS surveillance requirement would have "during shutdown" deleted only, with its original surveillance frequency remaining unchanged:

Item Technical Specification

36. TS 4.8.3.1e., Electrical Power Systems - D.C. Sources, batteries, delete the words "during shutdown" only.

One TS bases change would be made to provide an exception to the 18-month recommendation for battery service life testing provided by Regulatory Guide 1.129, "Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," Revision 1, February 1978:

Item Technical Specification

38. TS Bases 3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. Sources, D.C. Sources, and Onsite Power Distribution.

One TS surveillance requirement would receive administrative changes to maintain consistency for TS items that are not proposed for surveillance extension in this LAR:

Item Technical Specification

11. TS 4.4.4.1.b., RCS, Relief Valves, PORVs channel calibration.

Changes to the TS and associated bases are noted in the marked-up copies 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 completed detailed studies to evaluate the feasibility of increasing the length of fuel cycles for DCPD Units 1 and 2 to 24 months. Based on the results of these studies, PG&E concluded that 24-month fuel cycles are feasible and desirable for DCPD. The primary benefits of extended cycles will be fewer refuelings, improved outage scheduling, and reduced personnel dose and radwaste.

PG&E initiated extended cycles in the spring of 1996. Cycle 8 in Unit 2, which began in May 1996, and Cycle 9 in 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 full 24-month cycles.

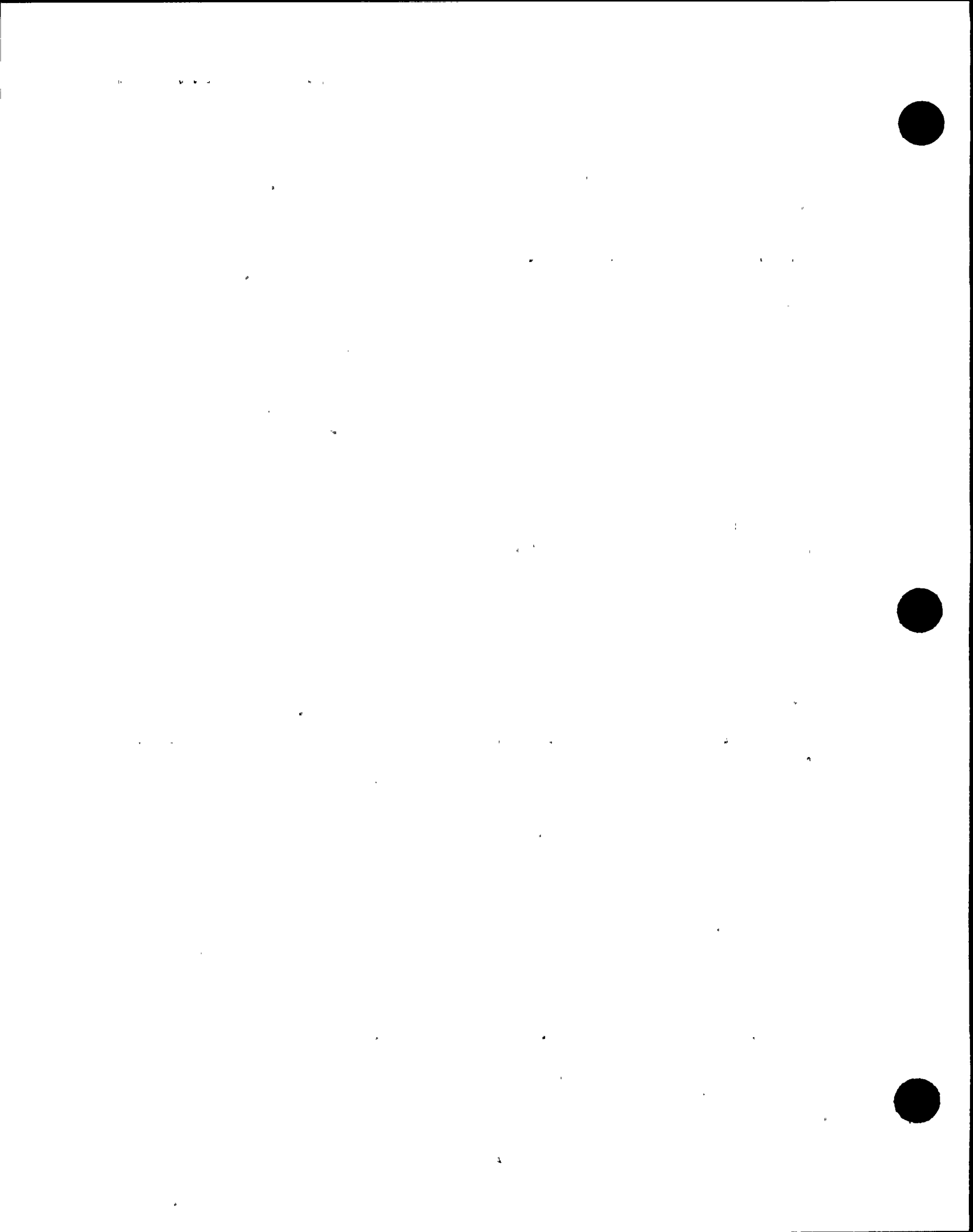
To gain the desired efficiencies associated with extended fuel cycles, refueling outage TS surveillance intervals must be increased. Generic guidance for licensees preparing LARs to increase surveillance intervals in support of 24-month cycles was issued by the NRC in GL 91-04. In preparing this LAR, PG&E has evaluated each proposed surveillance interval increase in accordance with GL 91-04.

C. TECHNICAL SPECIFICATION PAGES AFFECTED BY PREVIOUSLY SUBMITTED LARs

Several of the TS pages included in this LAR are affected by previously submitted LARs. Table 1 identifies the TS pages, previous LARs, and submittal dates. Issuance of License Amendments for the LARs listed in the table may require submittal of revised TS pages for this LAR.

TABLE 1: TS PAGES AFFECTED BY PREVIOUS LARs	
TS PAGE	LAR
3/4 3-32	96-04, Extended Fuel Cycles, February 2, 1996 96-09, Extended Fuel Cycles, May 31, 1996 96-10, Extended Fuel Cycles, December 9, 1996
3/4 3-33	96-04, Extended Fuel Cycles, February 2, 1996 96-10, Extended Fuel Cycles, December 9, 1996
3/4 3-34	96-04, Extended Fuel Cycles, February 2, 1996 96-10, Extended Fuel Cycles, December 9, 1996
3/4 4-9	96-04, Extended Fuel Cycles, February 2, 1996
3/4 4-10a	none
3/4 8-3	none
3/4 8-4	none
3/4 8-6	none
3/4 8-16	none

Instrumentation Section TS pages 3/4 3-32, 3-33, and 3-34 are proposed to be revised by the first three 24-month extended fuel cycle LARs. These LARs proposed to extend channel calibrations, channel operational tests, and trip actuating device operational tests. None of the three LARs are impacted by the proposed slave relay test frequency extensions in this LAR.



Pressurizer TS page 3/4 4-9 is also proposed to be revised by the first 24-month extended fuel cycle LAR. LAR 96-04 proposed to extend a separate surveillance requirement from 18 to 24 months: the verification of operability of the emergency power supply to the pressurizer heaters. That verification is performed by manually transferring the heaters from their normal nonvital power supply to the vital emergency power supply and energizing the heaters. Extending the electric capacity surveillance frequency in this LAR does not affect the performance of the manual transfer.

D. JUSTIFICATION

The changes proposed in this LAR are required to support implementation of extended cycles at DCPD. As noted previously, 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 Westinghouse plants Indian Point 2 and 3. The proposed surveillance interval increase for pressurizer heater capacity is in accordance with the recommendations of GL 93-05.

E. SAFETY EVALUATION

Safety evaluations for each of the proposed TS changes and associated administrative changes are provided in Attachment D. The evaluations have been performed in accordance with the guidance provided in GL 91-04 and GL 93-05.

For the proposed changes involving surveillance interval increases to 24 months and the associated station battery TS Bases change, historical plant operation, 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 (24 months +25 percent, or 30 months). In all cases, there are other tests which are normally performed at power which help provide assurance of continued equipment operability.

One PORV TS surveillance requirement would receive administrative changes to maintain consistency for TS items that are not proposed for surveillance extension in this LAR. This change does not affect the content of the channel calibration requirement and will maintain the TS in its present form.



DCPP is proposing deletion of the words "during shutdown," in accordance with GL 91-04, Enclosure 1, guidance for those surveillances associated with the EDGs (TS 4.8.1.1.2.b) and station batteries (TS 4.8.1.3). Because the terms "hot shutdown" and "cold shutdown" are defined in the DCPP TS as operating modes or conditions, the added restriction to perform certain surveillances during shutdown may be misinterpreted. In Enclosure 1 of GL 91-04, the NRC staff concluded:

"... the TS need not restrict surveillances as only being performed during shutdown. Nevertheless, safety dictates that when refueling interval surveillances are performed during power operation, licensees give proper regard for their effect on the safe operation of the plant. If the performance of a refueling interval surveillance during plant operation would adversely affect safety, the licensee should postpone the surveillance until the unit is shut down for refueling or is in a condition or mode that is consistent with the safe conduct of that surveillance."

PG&E agrees with the NRC staff that the deletion of the words "during shutdown" has no safety impact as long as the effect of surveillance performance is reviewed to ensure it is compatible with existing plant conditions. Plant administrative controls are in place to assure this review takes place. For surveillances with no impact on safety, these words unnecessarily restrict operation and maintenance of the plant.

In all cases, PG&E 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 proposed TS changes are provided in Attachment D. The proposed changes include: (1) one administrative change, (2) one TS Bases change, (3) one TS where "during shutdown" is deleted but the surveillance interval remains unchanged, (4) 32 surveillance interval increases from 18 to 24 months, and (5) one surveillance interval increase from 92 days to 24 months. The following summarizes the no significant hazards considerations for all of the proposed TS changes.

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

The proposed TS surveillance interval increases 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. Few surveillance and maintenance problems were identified. No problems have recurred following identification of root causes and implementation of corrective actions.

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 (24 months +25 percent, or 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.

Deletion of the phrase "during shutdown" for the applicable electrical TS will not alter the intent or method by which the inspections, tests, or verifications are conducted; nor alter the way any structure, system, or component functions. DCPD has administrative programs in place which require evaluation of risk and suitability of surveillance and maintenance activities to ensure that performance during plant operation does not adversely affect safety.



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The administrative change for one PORV TS regarding channel calibration only maintains the existing surveillance frequency. This revision does not alter the intent or method by which the inspections, tests, or verifications are conducted; nor alter the way any structure, system, or component functions.

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?*

For the proposed TS changes involving surveillance interval increases to 24 months, the surveillance and maintenance histories indicate that the equipment will continue to effectively perform its design function 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. No problems have recurred following identification of root causes and implementation of corrective actions. All identified potential time related degradations have insignificant effects in the timeframe of interest. The proposed surveillance interval increases would not affect the type of accidents possible.

Deletion of the phrase "during shutdown" for the applicable electrical TS does 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. DCPD has administrative programs in place which require evaluation of risk and suitability of surveillance and maintenance activities to ensure that performance during plant operation does not adversely affect safety.

The administrative change for one PORV TS regarding channel calibration only maintains the existing surveillance frequency. This revision does 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.

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?*

For the proposed TS changes involving surveillance interval increases to 24 months, evaluation of historical surveillance and maintenance data indicates there have been 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 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.

Deletion of the phrase "during shutdown" for the applicable electrical TS has 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. DCPD has administrative programs in place which require evaluation of risk and suitability of surveillance and maintenance activities to ensure that performance during plant operation does not adversely affect safety.

The administrative change for one PORV TS regarding channel calibration only maintains the existing surveillance frequency. This revision has no safety analysis impact.

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, PG&E concludes that the activities associated with this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c); 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 50.22(b), an environmental assessment of the proposed changes is not required.

