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June 2, 1997



PG&E Letter DCL-97-106

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 97-09

Technical Specification Conversion License Amendment Request

Ref: 1) PG&E Letter DCL-95-275, dated December 19, 1995

2) NUREG-1431, "Standard Technical Specifications - Westinghouse  
Plants," Revision 1, April 1995

Dear Commissioners and Staff:

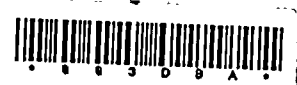
Enclosed is an application to revise Facility Operating License Nos. DPR-80 and DPR-82. The purpose of this license amendment request (LAR) is to provide a submittal pursuant to Reference 1 to convert the current Diablo Canyon Power Plant (DCPP) Units 1 and 2 Technical Specifications (TS) to a set of TS based upon the improved Standard Technical Specifications (ISTS) (Ref. 2).

PG&E has prepared this submittal to be consistent with 10 CFR 50.36a. Attachment 1 to this letter is an oath and affirmation. Attachment 2 is a general description and assessment of the proposed full conversion. Attachment 3 contains a list of the changes within the submittal that are not directly related to the conversion process, a list of other pending or projected LARs that could potentially impact the review of this conversion LAR, and a list of acronyms used throughout the LAR. Attachments 4 through 18 provide the specific changes and the justifications that support the acceptability of the changes and the evaluations that support the conclusion that these do not involve a significant hazard consideration for each section of the TS. Attachments 19 and 20 are the improved TS (ITS) for DCPP. The ITS is the ISTS with the proposed changes incorporated. Attachment 19 includes the ITS and Attachment 20 includes the ITS Bases.

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Enclosures to: Files  
NRC PDR

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PDR ADDCK 05000275  
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Attachment 21 includes an evaluation of and justification for those TS proposed for relocation to licensee control in accordance with 10 CFR 50.36(c). These evaluations were previously included in LAR 96-01, "Relocation of Selected Technical Specifications in Accordance with NRC Final Policy Statement and NUREG-1431, Rev. 1," dated January 17, 1996.

PG&E developed this conversion application in conjunction with three other utilities: Union Electric (UE) Company, Wolf Creek Nuclear Operation Corporation (WCNOC), and TU Electric. Two enclosures (Enclosures 3B and 6B) in Attachments 4 through 18 to this submittal contain conversion comparison tables. These comparison tables reflect how the proposed changes are addressed by each of the four utilities. The tables are provided to assist the NRC in performing reviews of the individual submittals of each of these utilities. Only the information in these tables related to PG&E and DCPD is considered to be part of this LAR. The information related to the other utilities is provided for information only.

UE, WCNOC, and TU Electric are submitting LARs for their respective plants (Callaway, Wolf Creek Generating Station, and Comanche Peak Steam Electric Station). Because of the similarities in the attached LAR and the submittals of these other three licensees, PG&E requests that, to the extent possible, the NRC review these four submittals together in order to minimize the required NRC resources, reduce licensee costs, and reduce overall review time. Don Woodlan of TU Electric is the Chairman of the Joint Licensing Subcommittee, which includes members from each of the four utilities, and coordinated the joint development of the four full conversion applications. Mr. Woodlan is the lead utility contact to resolve matters that relate to the NRC's review of these four packages and can be reached at (817) 897-6887.

Because implementation of the ITS involves significant training and revisions to implementing procedures, PG&E will interface with the NRC during the review process to establish an appropriate implementation date or period.

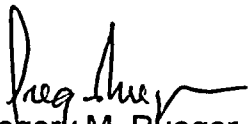
The changes proposed in this LAR are not required to address an immediate



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safety concern. Therefore, PG&E requests that the NRC assign a medium priority for review and approval of this LAR.

Sincerely,

  
Gregory M. Rueger

cc: Edgar Bailey, DHS  
Steven D. Bloom  
Kenneth E. Perkins  
Ellis W. Merschoff  
Michael D. Tschiltz  
Diablo Distribution

Attachments



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