

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9803310078 DOC. DATE: 98/03/18 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
WOMACK, L.F. Pacific Gas & Electric Co.
RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards application for amends to licenses DPR-80 & DPR-82, clarifying LCO for containment spray sys.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2+26
TITLE: OR Submittal: General Distribution

NOTES:

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

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTR 14 ENCL 13

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



111

Pacific Gas and Electric Company

245 Market Street, Room 836-N9B
San Francisco, CA 94105
Mailing Address
Mail Code N9B
P.O. Box 770000
San Francisco, CA 94177
415/973-0600 Fax 415/973-6567

Lawrence F. Womack
Vice President
Nuclear Technical Services

March 18, 1998

PG&E Letter DCL 98-045



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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
License Amendment Request 98-03
Containment Spray During The Recirculation Phase of a LOCA

Dear Commissioners and Staff:

Enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 in accordance with 10 CFR 50.90. This license amendment request (LAR) submits for NRC review and approval changes to Technical Specification (TS) Bases 3/4.6.2.1, "Containment Spray System," to clarify the limiting condition for operation for the containment spray (CS) system for Diablo Canyon Power Plant, Units 1 and 2.

In 1991, during a review of design calculations for containment heat removal following a loss-of-coolant accident (LOCA), PG&E identified that heat loads from the residual heat removal (RHR) system during the recirculation phase of a LOCA may cause component cooling water (CCW) temperature design basis limits to be exceeded during certain conditions. This condition was reported in Licensee Event Report 1-91-018-01 (PG&E letter DCL-92-148, dated June 29, 1992). Corrective actions included implementation of Revisions 9 and 3 to Emergency Operating Procedure (EOP) E-1.3, "Transfer to Cold Leg Recirculation," for Units 1 and 2, respectively, on December 13, 1991. These revisions specified placing only one RHR pump in operation, rather than two, if necessary to maintain acceptable CCW temperatures during the recirculation phase of a LOCA and terminating CS when in this condition. These procedure revisions were made based on evaluations that demonstrated CS was not necessary during the recirculation phase of the worst case LOCA. At that time, PG&E considered the actions taken under the 10 CFR 50.59 process to declassify the CS function during the recirculation phase of a LOCA were appropriate, that an unreviewed safety question (USQ) was not involved, and consequently that NRC approval was not required prior to implementing the changes.

9803310078 980318
PDR ADOCK 05000275
P PDR

ADD 11



TS 3/4.6.2.1 specifies that the CS system shall be operable with each spray system capable of taking suction from the refueling water storage tank and of transferring the spray function to a RHR system taking suction from the containment sump. TS Bases 3/4.6.2.1 states that operability of the CS system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. PG&E has interpreted these statements to mean that there must be a capability of aligning the CS system to the RHR system if needed, and not that operation of recirculation spray is required. PG&E believed that the procedure revisions continued to provide this capability.

During an NRC architect engineer inspection conducted in August and September 1997, the inspection team indicated that PG&E's decision to declassify the CS function during the recirculation phase of a LOCA was a potential USQ (NRC Inspection Report Nos. 50-275/97-202 and 50-323/97-202).

In order to resolve this disagreement regarding the USQ in an expeditious manner, while at the same time preserving PG&E's position regarding the correctness of its prior actions, PG&E is submitting this LAR for NRC review. PG&E considers that the CS system is operable and is consequently capable of performing its required safety functions. Operation in accordance with EOP E-1.3 is not in conflict with any TS.

PG&E requests that this LAR be assigned a medium priority for review and approval, since there is no immediate safety concern, and that the amendments be made immediately effective upon issuance by the NRC.

Sincerely,



Lawrence F. Womack

cc: Edgar Bailey, DHS
Steven D. Bloom
Ellis W. Merschoff
Kenneth E. Perkins
David L. Proulx
Diablo Distribution

Enclosures

JER/2057

