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 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
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 OATLEY, D.H. Pacific Gas & Electric Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Records Management Branch (Document Control Desk)

See Proposed Change To Tech Specs

SUBJECT: Forwards response to NRC 980707 & 09 RAIs re LAR to convert current TS Secitons 1.0, 2.0 & 3.0 to Improved Std TS.

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**Pacific Gas and
Electric Company**

David H. Oatley
Vice President—Diablo Canyon
Operations and Plant Manager

Diablo Canyon Power Plant
P.O. Box 56
Avila Beach, CA 93424

805.545.6000

August 28, 1998

PG&E Letter DCL-98-116

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,"
Response to Request for Additional Information for Sections 1.0, 2.0, and 3.0

- Reference 1) NRC letter from Steven D. Bloom to Gregory M. Rueger, dated July 7, 1998
- 2) NRC letter from Steven D. Bloom to Gregory M. Rueger, dated July 9, 1998
- 3) DCL-97-106, "License Amendment Request 97-09, Technical Specification Conversion License Amendment Request," dated June 2, 1997
- 4) DCL-98-003, "License Amendment Request 97-09, Errata," dated January 9, 1998

Dear Commissioners and Staff:

PG&E submitted a license amendment request (Reference 3) for Diablo Canyon Power Plant (DCPP), Units 1 and 2 to convert the current DCPP Technical Specifications (TS) to a set of TS based upon the improved standard TS. PG&E submitted an errata to Reference 3 as noted in Reference 4. The NRC staff requested additional information regarding Section 1.0, "Use and Application"; Section 2.0, "Safety Limits"; and Section 3.0, "Limiting Conditions for Operation Applicability/Surveillance Requirement Applicability" of the proposed TS changes in References 1 and 2. The requested information, other than the response to Comment Number 1.1-4, is provided in the Enclosures to this letter as are any additional changes needed for Sections 1.0, 2.0, and 3.0 as identified by PG&E. The response to Comment Number 1.1-4 will be provided separately after the August 17, 1998, NRC letter to NEI on TSTF-111 has been fully evaluated.

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P PDR

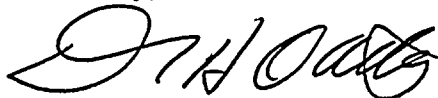


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This letter and the Enclosures are not a supplement to Reference 3, and thus have not been reviewed and approved by DCP's Plant Staff Review Committee. A supplement to Reference 3 will be provided at a later date. Any deviations from the responses provided in this letter will be discussed in the supplement.

Sincerely,



David H. Oatley

cc: Edgar Bailey, DHS
Steven D. Bloom
Dennis F. Kirsch
Ellis W. Merschoff
David L. Proulx
Diablo Distribution

Enclosures
MRZ/



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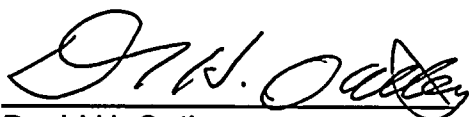
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

_____)	Docket No. 50-275
In the Matter of)	Facility Operating License
PACIFIC GAS AND ELECTRIC COMPANY)	No. DPR-80
)	
Diablo Canyon Power Plant)	Docket No. 50-323
Units 1 and 2)	Facility Operating License
_____)	No. DPR-82

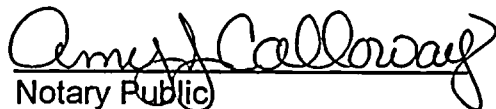
AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath says that he is Vice President - Diablo Canyon Operations and Plant Manager of Pacific Gas and Electric Company; that he has executed the "Response To NRC Request For Additional Information," dated June 7 and 9, 1998, regarding License Amendment Request 97-09, "Technical Specification Conversion," on behalf of said company with full power and authority to do so; that he is familiar with the content thereof: and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.



David H. Oatley
Vice President - Diablo Canyon
Operations and Plant Manager

Subscribed and sworn to before me this ~~31st~~^{28th} day of August 1998.
County of San Luis Obispo
State of California



Notary Public





1. 2. 3.

4.

5. 6. 7. 8. 9. 10.

ACRONYM LIST

ADV	Atmospheric Dump Valve	RCS	Reactor Coolant System
CFCU	Containment Fan Cooling Unit	RG	Regulatory Guide
CIV	Containment isolation Valve	RHR	Residual Heat Removal
CPSES	Comanche Peak Steam Electric Station	SER	Safety Evaluation Report
CTS	Current Tech Spec	SR	Surveillance Requirement
DBA	Design Basis Accident	STS	Standard Tech Spec
DLAP	Department Level Administrative Procedure	TRM	Technical Requirements Manual
DOC	Description of Change	TSTF	Tech Spec Task Force
ECCS	Emergency Core Cooling System	USAR	Updated Safety Analysis Report
ECG	Equipment Control Guideline	WCGS	Wolf Creek Generating Station
EQ	Environment Qualification	WOG	Westinghouse Owners Group
FLOG	Four Loop Owner's Group		
FSAR	Final Safety Analysis Report		
GDC	Generic Design Criteria		
IEEE	Institute of Electrical and Electronic Engineers		
IST	In-service Test		
ITS	Improved Tech Spec		
JFD	Justification For Differences		
LA	License Amendment		
LAR	License Amendment Request		
LCO	Limiting Condition of Operation		
LER	Licensee Event Report		
LG	Less Restrictive		
LOCA	Loss of Coolant Access		
MFIV	Main Feedwater Isolation Valve		
MFRV	Main Feedwater Regulating Valves		
MSSV	Main Steam Safety Valve		
PAMS	Post Accident Monitoring System		
RA	Required Actions		
RAI	Request for additional information		

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JLS CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS

**CTS 1.0 - DEFINITIONS
ITS 1.0 - USE AND APPLICATION**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND LICENSEE
INITIATED ADDITIONAL CHANGES**



INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
1.1-1	DC, CP, WC, CA	YES
1.1-2	DC, CP, WC, CA	YES
1.1-3	CP, WC, CA	NA
1.1-4	DC, CP, WC, CA	YES
1.1-5	DC, CP, WC, CA	YES
1.1-6	DC, CP, WC, CA	YES
1.1-7	DC, CP, WC, CA	YES
1.1-8	CP, WC, CA	NA
1.1-9	DC, CP, WC, CA	YES
1.4-1	DC, CP, WC, CA	YES
TR 1.0-006	DC, CP, WC, CA	YES
DC-ALL-002 (1.0 changes only)	DC	see DCL-98-003
DC-ALL-005 (3.3 Bases changes only for TR 1.0-006)	DC	YES



JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR PROVIDING ADDITIONAL INFORMATION

The following methodology is followed for submitting additional information:

1. Each licensee is submitting a separate response for each section.
2. If an RAI does not apply to a licensee (i.e., does not actually impact the information that defines the technical specification change for that licensee), "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
3. If a licensee initiated change does not apply, "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
4. The common portions of the "Additional Information Cover Sheets" are identical, except for brackets, where applicable (using the same methodology used in enclosures 3A, 3B, 4, 6A and 6B of the conversion submittals). The list of attached pages will vary to match the licensee specific conversion submittals. A licensee's FLOG response may not address all applicable plants if there is insufficient similarity in the plant specific responses to justify their inclusion in each submittal. In those cases, the response will be prefaced with a heading such as "PLANT SPECIFIC DISCUSSION."
5. Changes are indicated using the redline/strikeout tool of WordPerfect or by using a hand markup that indicates insertions and deletions. If the area being revised is not clear, the affected portion of the page is circled. The markup techniques vary as necessary, based on the specifics of the area being changed and the complexity of the changes, to provide the clearest possible indication of the changes.
6. A marginal note (the Additional Information Number from the index) is added in the right margin of each page being changed, adjacent to the area being changed, to identify the source of each change.
7. Some changes are not applicable to one licensee but still require changes to the Tables provided in Enclosures 3A, 3B, 4, 6A, and 6B of the original license amendment request to reflect the changes being made by one or more of the other licensees. These changes are not included in the additional information for the licensee to which the change does not apply, as the changes are only for consistency, do not technically affect the request for that licensee, and are being provided in the additional information being provided by the licensees for which the change is applicable. The complete set of changes for the license amendment request will be provided in a licensing amendment request supplement to be provided later.



8. The item numbers are formatted as follows:

[Source] [ITS Section]-[nnn]

Source = Q - NRC Question
 CA - AmerenUE
 DC - PG&E
 WC - WCNOG
 CP - TU Electric
 TR - Traveler

ITS Section = The ITS section associated with the item (e.g., 3.3). If all sections are potentially impacted by a broad change or set of changes, "ALL" is used for the section number.

nnn = a three digit sequential number



ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 1.1-1

APPLICABILITY: DC, CP, WC, CA

REQUEST:

CTS 1.3, Analog Channel Operations Test
CTS 1.3, Channel Operational Test [Diablo Canyon]
CTS 1.7, Channel Functional Test [Diablo Canyon]
CTS 1.35, Trip Actuating Device Operational Test [Wolf Creek]
CTS 1.36, Trip Actuating Device Operational Test [Callaway]
CTS 1.37, Trip Actuating Device Operational Test [Comanche Peak]
CTS 1.38, Trip Actuating Device Operational Test [Diablo Canyon]
DOC 1-30-A
ITS 1.1, Channel Operational Test (COT)
ITS 1.1, Channel Functional Test (CFT) [Diablo Canyon]
ITS 1.1, Trip Actuating Device Operational Test (TADOT)
JFD 1.1-9

These are changes to both the CTS and the STS and are considered generic. Therefore, they are beyond the scope of the conversion review. The DOC states that these changes are consistent with TSTF-39, Rev. 1. Also, Diablo Canyon's ITS markup appears to be in error as shown by "Channel Operational" versus "Channel Operational Test (COT)."

Comment: If NRC has not approved TSTF-39 by the time the draft safety evaluation is prepared, then these changes should be withdrawn from the conversion submittal at that time. These changes will not be reviewed on a plant-specific basis. In addition, correct the Diablo Canyon ITS markup for COT.

FLOG RESPONSE: TSTF-39 Rev. 1 has been withdrawn by the TSTF. However, changes addressed in TSTF-39 Rev. 1 have been subsumed by TSTF-205. Rev. 1 of TSTF-205 is currently undergoing final review by the TSTF members. After final wording changes for the COT definition as well as Section 3.3 Bases changes to establish the requirements for relay contact surveillance testing (issue originally raised at Peach Bottom) are agreed upon, Rev. 1 will be submitted for NRC review. The attached pages represent the definition changes to be included in Rev. 1. The Section 3.3 Bases changes will be addressed under that Section's review.

ATTACHED PAGES:

Encl. 2	1-1, 1-1a, 1-4, 1-6, and 1-7
Encl. 3A	5
Encl. 3B	4
Encl. 5A	Traveler Status Sheet
Encl. 5A	1.1-2, 1.1-4, and 1.1-6
Encl. 6A	2
Encl. 6B	2

2