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Mr. A. Schwencer, Acting Chief
Licensing Branch No. 3
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-275
Docket No. 50-323
Diablo Canyon Units 1 & 2

Dear Mr. Schwencer:

At an NRC meeting held on November 30, 1979, in Bethesda, Maryland, several applicants with near-term OL plants, including Pacific Gas and Electric Company, were advised of requirements resulting from the NRC's evaluation of the Auxiliary Feedwater Systems (AFWS) of 33 operating units. The attached material is submitted in response to that meeting and to Parts (b) and (d) of an NRC letter by D. F. Ross, dated March 10, 1980.

Part (d) of the NRC letter requested information relating to the design basis of PGandE's AFWS flow requirements and confirmation that the AFWS will meet those requirements. Part (b) requested that a reliability evaluation be performed to identify necessary changes in AFWS design or procedures to assure safe operation, and to identify other system characteristics in design which, on a long-term basis, may require system modifications. Because the objectives are different the assumptions used in the design basis analysis and the reliability analysis are different.

Our response to Part (d) (enclosed as attachment 1) references the design basis analyses performed by Westinghouse that appears in Chapter 15 of the Diablo Canyon FSAR. The analysis assumed delivery of water within 10 minutes to at least two steam generators from at least one AFWS pump. This design basis analysis is conservative and was performed to demonstrate compliance with specific licensing criteria for Condition II, III, and IV accidents.

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The response to part (b) (enclosed as attachment 2) is the reliability analysis by Pickard, Lowe and Garrick which was performed

to calculate the relative value of system reliability in performing its heat removal function defined on a best estimate basis for the three transients discussed in Appendix III of NUREG-0611. The Pickard, Lowe and Garrick analysis is based upon Westinghouse's judgment that total delivery of flow of at least 350 gpm to at least one steam generator from at least one AFWS pump in 40 minutes would prevent damage of the fuel or clad.

The conclusion of the Pickard, Lowe and Garrick report shows that in the emergency mode the Diablo Canyon Auxiliary Feedwater System is very reliable. Redundancy, separation, availability during testing and recoverability make the system remarkably sound. Given the already low unavailability in comparison with similar systems at other plants efforts to further improve Auxiliary Feedwater System reliability cannot be justified.

Five copies of this letter and attachments are being sent today to Mr. Bart Buckley by courier.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it to me in the enclosed addressed envelope.

Very truly yours,

Philip A. Crane, Jr.

Attachments (40)
CC w/attachments: Service List