

ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

License Amendment Request
No. 86-13

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company (PGandE) hereby applies to amend its Diablo Canyon Power Plant (DCPP) Facility Operating License Nos. DPR-80 and DPR-82.

The proposed changes amend the Technical Specifications (Appendix A of the Licenses) as regards Technical Specifications 3/4.3.1 and 3/4.3.2.

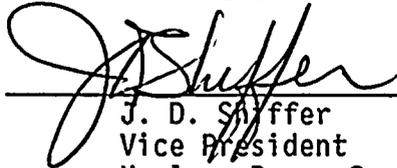
Information on the proposed changes is provided in Attachments A and B.

These changes have been reviewed and are considered not to involve a significant hazards consideration as defined in 10 CFR 50.92 or require an environmental assessment in accordance with 10 CFR 51.22(b). Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes.

Subscribed in San Francisco, California, this 24th day of December 1986.

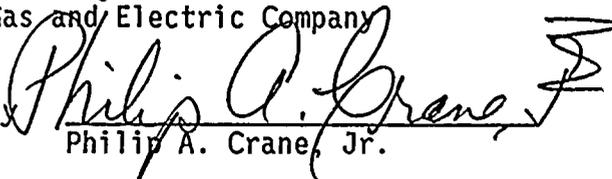
Respectfully submitted,

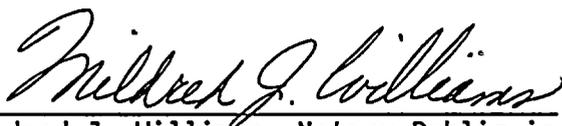
Pacific Gas and Electric Company

By 
 J. D. Shaffer
 Vice President
 Nuclear Power Generation

Robert Ohlbach
Philip A. Crane, Jr.
Richard F. Locke
Attorneys for Pacific
Gas and Electric Company

Subscribed and sworn to before me
this 24th day of December 1986.

By 
 Philip A. Crane, Jr.


 Mildred J. Williams, Notary Public in
 and for the City and County of
 San Francisco, State of California
 My commission expires August 7, 1989.

Attachments

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MILDRED J. WILLIAMS
 NOTARY PUBLIC - CALIFORNIA
 CITY & COUNTY OF SAN FRANCISCO
 My Commission Expires Aug. 7, 1989.

Attachment A

TECHNICAL SPECIFICATION TABLES 4.3-1 AND 4.3-2 REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specification Tables 4.3-1, "Reactor Trip System Instrumentation," and 4.3-2, "Engineered Safety Features Actuation System Instrumentation Surveillance Requirements," to change two surveillance intervals not addressed previously in PGandE's LAR 85-04. The surveillance test interval in Table 4.3-1 for functional unit 20, Reactor Trip System Interlocks, Analog Channel Operational Test, is changed from "S/U (1)" (prior to each reactor startup) to "R" (at least once per 18 months) for each of the five interlocks. The surveillance test interval in Table 4.3-2 for three TavG-Low-Low signals, Analog Channel Operational Test, is changed from "M" (at least once per 31 days) to "Q" (at least once per 92 days).

The wording of Table 4.3-1, notation (5), is also clarified to indicate that detector plateau curves are required only for the source range neutron flux channel.

Changes to the Technical Specifications of Operating License Nos. DPR-80 and DPR-82 are noted in the marked-up copy of the applicable Technical Specifications (Attachment B).

B. JUSTIFICATION

PGandE submitted LAR 85-04 on May 20, 1985, to incorporate the surveillance test intervals and allowed outage times proposed in WCAP-10271. This LAR was subsequently included in the Diablo Canyon Units 1 and 2 combined Technical Specifications and is addressed in Safety Evaluation Report Supplement No. 27 (NUREG-0675).

Shortly after the approval of LAR 85-04, PGandE received a copy of a letter from H. R. Denton (NRC) to L. D. Butterfield (Westinghouse Owners Group), dated July 24, 1985, which provided additional guidance on reactor trip system Technical Specification changes.

The changes proposed in this LAR are consistent with WCAP-10271 and the NRC Staff position on treatment of reactor trip system (RTS) channels shared by the engineered safety features actuation system (ESFAS), as indicated in H. R. Denton's letter of July 24, 1985, to the Westinghouse Owners Group. Enclosure 3 to this letter discussed the bases for the Staff's conclusions, including a licensee program to address instrument drift and certain operational surveillance testing and checks of shared channels. PGandE has already implemented a program at DCPD to evaluate and address instrument



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drift for RTS channels including those tested on a quarterly interval. Additionally, the DCPD surveillance program includes channel checks of components shared by the RTS and ESFAS. Further, the definition of analog channel operational test in Technical Specification Section 1.3 meets the intent of Enclosure 3 of the July 24, 1985, letter.

The change to Table 4.3-1 regarding the detector plateau curve is required because the intermediate range and power range neutron flux channels are ion chambers (current devices); thus a detector plateau curve is not applicable.

C. SAFETY EVALUATION

PGandE has evaluated the hazards consideration 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 previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the significant hazards consideration standards.

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

The proposed changes to Technical Specification Tables 4.3-1 and 4.3-2 relax an operating restriction that was imposed because acceptable operation was not yet demonstrated. Acceptable operation for the change in surveillance intervals was demonstrated in WCAP-10271 and approved by the NRC, as indicated in H. R. Denton's letter of July 24, 1985, to the Westinghouse Owners Group, and in the NRC Staff Safety Evaluation Report, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation



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System," dated February 21, 1985. The change to Table 4.3-1 regarding the detector plateau curve is a clarification to ensure that the Technical Specifications accurately reflect the design of DCP. Therefore, this license amendment request does 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?

The proposed changes do not necessitate physical alteration of the plant or changes in parameters governing normal plant operation. Therefore, the 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?

The change in reactor protection system unavailability is very small because of the proposed change in surveillance intervals. Further, acceptable operation with the proposed surveillance intervals has been demonstrated and has been reviewed and approved by the NRC Staff. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

D. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PGandE concludes that the activities associated with this License Amendment Request satisfy the no significant hazards consideration standards of 10 CFR 50.92(c), and accordingly, a no significant hazards consideration finding is justified.

E. ENVIRONMENTAL EVALUATION

PGandE 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 effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.



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Attachment B

MARKED-UP TECHNICAL SPECIFICATION TABLES 4.3-1 AND 4.3-2

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page 3/4 3-10
page 3/4 3-11
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page 3/4 3-34
page 3/4 3-35

