



May 12, 2017

PG&E Letter DCL-17-044  
PG&E Letter DIL-17-006

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

10 CFR 50.54, 10 CFR 72.32

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Docket No. 72-26, Materials License No. SNM-2511  
Diablo Canyon Independent Spent Fuel Storage Installation  
Emergency Plan Update for Appendix D Category H, Appendix F, Section 5, and Coversheet

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54, and including the requirements of 10 CFR 72.32 for the Independent Spent Fuel Storage Installation, Pacific Gas and Electric Company (PG&E) is providing a summary of the analysis of changes to Emergency Plan (E-Plan) Appendix D Category H, "Hazards"; Appendix F, "ERO On-Shift Staffing Analysis Report"; Section 5, "Organizational Control of Emergencies"; and the E-Plan Coversheet.

The associated enclosures are listed below:

Enclosure	Title
1	Revision and Corresponding Change Numbers for Emergency Plan Sections and Appendices
2	Summary of the Analysis of Changes to Emergency Plan, Appendix D, Category H, "Hazards"
3	Summary of the Analysis of Changes to Emergency Plan, Appendix F, "ERO On-Shift Staffing Analysis Report"
4	Summary of the Analysis of Changes to Emergency Plan Section 5, "Organizational Control of Emergencies"
5	Summary of the Analysis of Changes to Emergency Plan Coversheet

PG&E evaluated the changes for a reduction in effectiveness, as defined in 10 CFR 50.54(q), and concluded that the changes do not reduce the effectiveness of the E-Plan. The E-Plan continues to meet the requirements in Appendix E to



10 CFR 50 and the planning standards of 10 CFR 50.47(b). Therefore, prior NRC approval of the associated changes was not required.

This update does not contain any privacy and proprietary information in accordance with NRC Generic Letter 81-27, "Privacy and Proprietary Material in Emergency Plans."

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If there are questions regarding this update, please contact Mr. Michael A. Ginn, Emergency Planning Manager, at (805) 545-3446.

Sincerely,

James M. Welsch  
*Vice President, Nuclear Generation*

bnsn/4540/50913053/50913054/50917065/50913276

Enclosures

cc/enc: John M. Goshen, P.E., NMSS Project Manager  
Kriss M. Kennedy, NRC Region IV Administrator  
Christopher W. Newport, NRC Senior Resident Inspector  
Balwant K. Singal, NRC Senior Project Manager  
Senior Emergency Preparedness Inspector (RGN-IV/DR)

Enclosure 1  
PG&E Letter DCL-17-044  
PG&E Letter DIL-17-006

**Diablo Canyon Power Plant Emergency Plan**

Revision and Corresponding Change Numbers for  
Emergency Plan Sections and Appendices

## DIABLO CANYON POWER PLANT EMERGENCY PLAN

Section/Appendix	Rev. & Change	Title
<b>E-Plan Coversheet*</b>	<b>Rev. 4, Change 1</b>	<b>Emergency Plan</b>
E-Plan Table of Contents	Rev. 4, Change 5	Table of Contents
Section 1	Rev. 4, Change 07	Definitions & Abbreviations
Section 2	Rev. 4, Change 04	Scope and Applicability
Section 3	Rev. 4, Change 00	Summary of Emergency Plan
Section 4	Rev. 4, Change 15	Diablo Canyon Power Plant Emergency Plan Emergency Conditions
<b>Section 5*</b>	<b>Rev. 4, Change 18</b>	<b>Organizational Control of Emergencies</b>
Section 6	Rev. 4, Change 17	Emergency Measures
Section 7	Rev. 4, Change 20	Emergency Facilities and Equipment
Section 8	Rev. 4, Change 15	Maintaining Emergency Preparedness
Section 9	Rev. 4, Change 02	Recovery
Section 10	Rev. 4, Change 02	References
Appendix A	Rev. 4, Change 07	Procedures
Appendix B	Rev. 4, Change 02	Offsite Agency Support Documents
Appendix C	Rev. 4, Change 00	Non-Applicable NUREG-0654 Standards
Appendix E	Rev. 4, Change 00	Evacuation Time Estimates
<b>Appendix F*</b>	<b>Rev. 4, Change 05</b>	<b>ERO On-Shift Staffing Analysis Report</b>
Appendix G	Rev. 4, Change 01	Protective Action Recommendation (PAR) Strategy Bases
Appendix D Table of Contents	Rev. 4, Change 01	Table of Contents
Appendix D, Introduction	Rev. 4, Change 02A	Introduction
Appendix D, Category R	Rev. 4, Change 02	Abnormal Rad Levels/Radiological Effluent
Appendix D, Category C	Rev. 4, Change 01A	Cold Shutdown/Refueling, System Malfunction
Appendix D, Category E	Rev. 4, Change 00	Independent Spent Fuel Storage Installation (ISFSI)
<b>Appendix D, Category H*</b>	<b>Rev. 4, Change 03</b>	<b>Hazards</b>
Appendix D, Category S	Rev. 4, Change 01A	System Malfunction
Appendix D, Category F	Rev. 4, Change 01	Fission Products Barriers
Appendix D, Bases	Rev. 4, Change 02A	Fission Product Barrier Loss/Potential Loss Matrix Bases

**\*Revised Section**

**Summary of the Analysis of Changes to  
Emergency Plan, Appendix D, Category H  
Hazards**

**Summary of the Analysis of Changes to Emergency Plan, Appendix D, Category H**

#	Revision 4.02 Content	Revision 4.03 Content	Reason for Change
1	<p>Page 48 of 56</p> <p>Typically, completion of step 12 of OP AP-8A is indication that control of the plant can be established.</p>	<p>Page 48 of 56</p> <p>Typically, completion of step 14 of OP AP-8A is indication that control of the plant can be established.</p>	<p>Modified existing content.</p> <p>NFPA 805 transition resulted in a number of procedure changes, one of which was to OP AP-8A. The E-Plan Appendix D Category H cited a specific step in OP AP-8A which is no longer correct based on the numbering of the revised procedure. This revision corrects the procedure step reference and aligns the E-Plan with the updated version of OP AP-8A.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluations 2017-09 and 2017-10 document the detailed analysis of this change.</b></p>

**Summary of the Analysis of Changes to  
Emergency Plan, Appendix F  
ERO On-Shift Staffing Analysis Report**

**Summary of the Analysis of Changes to Emergency Plan, Appendix F**

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
1	Table of Contents and 3.2.14 - Appendix R Fire Response	Table of Contents and 3.2.14 – NFPA 805 Fire Response	<p>Modified existing content.</p> <p>Updated the title of the fire response scenario to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 Fire Protection Program (FPP), as per License Amendments 225 and 227, which supersedes the fire protection program that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>
2	Table of Contents and 6.6 – Appendix R	Table of Contents and 6.6 - NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants	<p>Modified existing content.</p> <p>Updated the title of the fire response scenario to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 Fire Protection Program (FPP), as per License Amendments 225 and 227, which supersedes the fire protection program that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>



#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
3	Table of Contents 6.23 - EOP E-3, No documents identified	Table of Contents 6.23 - EOP E-3, Steam Generator Tube Rupture	<p>Modified existing content.</p> <p>Editorial change only. Included missing procedure title.</p> <p><b>No additional evaluation required.</b></p>
4	Table of Contents and 6.38 – O-19, Nuclear Operator Actions Following a Reactor Trip	Table of Contents and 6.38 – OP O-19, Nuclear Operator Actions Following a Reactor Trip	<p>Modified existing content.</p> <p>Editorial change only. Corrected procedure title.</p> <p>This change was made throughout the procedure for consistency.</p> <p><b>No additional evaluation required.</b></p>
5	<p>3.2.14 Appendix R Fire Response</p> <p>The Control Room fire scenario requiring evacuation and plant shutdown at the remote stations is the most severe Appendix R scenario with regard to operator actions as stated in OP AP-8A Section 3.1. No additional Appendix R fire response scenarios are carried forward in the analysis.</p>	<p>3.2.14 NFPA 805 Fire Response</p> <p>NFPA 805 replaced Appendix R as the approved fire protection program in 2017. As was the case with Appendix R, the Control Room fire scenario requiring evacuation and plant shutdown at the remote stations is the most limiting NFPA 805 scenario with regard to operator actions. No additional NFPA 805 fire response scenarios are carried forward in the analysis.</p>	<p>Modified existing content.</p> <p>Updated the title of the fire response scenario to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
6	<p>Table 3-1 – Analysis #14            Summary Description of Event or Accident</p> <p>Appendix R Fire Response</p>	<p>Table 3-1 – Analysis #14 Summary            Description of Event or Accident</p> <p>NFPA 805 (formerly Appendix R)            Fire Response</p>	<p>Modified existing content.</p> <p>Updated the title of the fire response scenario to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>
7	<p>Table 3-1 – Analysis #14            Reference Document(s)</p> <p>Appendix R            OP AP-8A</p>	<p>Table 3-1 – Analysis #14            Reference Document(s)</p> <p>NFPA 805            OP AP-8A</p>	<p>Modified existing content.</p> <p>Updated the title of the fire response reference materials to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
8	<p>Table 3-1 – Note 4</p> <p>The Control Room fire and evacuation is the limiting Appendix R fire response scenario with regard to complex actions by the on-shift ERO.</p>	<p>Table 3-1 – Note 4</p> <p>The Control Room fire and evacuation is the limiting NFPA 805 fire response scenario with regard to complex actions by the on-shift ERO.</p>	<p>Modified existing content.</p> <p>Updated the title of the fire response scenario to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>
9	<p>5.3</p> <p>The Work Control Shift Foreman performed task (5/13) NRC notification (via wireless headset) while simultaneously performing STA oversight tasks. Since the task of continuous NRC communication is compatible with the (2/4) STA oversight tasks...</p>	<p>5.3</p> <p>The Work Control Shift Foreman performed task (5/13) NRC notification (via wireless headset) while simultaneously performing STA oversight tasks. Since the task of continuous NRC communication is compatible with the (2/4.B) STA oversight tasks...</p>	<p>Modified existing content.</p> <p>Updated the Work Control Shift Foreman (WCSFM) Shift Technical Advisor (STA) task identifier to account for a new task 2/4.A that was added to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
10	7.2.11 – Table 1 WCSFM Role  2 / 4 5 / 11 5 / 13	7.2.11 – Table 1 WCSFM Role  2 / 4.A 2 / 4.B 5 / 11 5 / 13	Modified existing content.  Updated the WCSFM STA role to account for a new task 2/4.A that was added to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>
11	7.2.11 – Table 1 U1 Turbine Building Operator Role  2 / 10	7.2.11 – Table 1 U1 Turbine Building Operator Role  2 / 10.A 2 / 10.B	Modified existing content.  Updated the U1 Turbine Building Operator Role to account for a new task 2/10.A that was added to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the fire protection program that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
12	7.2.11 – Table 1 U2 Turbine Building Operator Role  2 / 12	7.2.11 – Table 1 U2 Turbine Building Operator Role  2 / 12.A 2 / 12.B	Modified existing content.  Updated the U2 Turbine Building Operator Role to account for a new task 2/12.A that was added to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>
13	7.2.11 – Table 2 STA (WCSFM) Task Description  Perform STA Tasks from TSC	7.2.11 – Table 2 STA (WCSFM) Task Description  A. Dispatch Operators (sect 6) B. Perform STA Tasks from TSC	Modified existing content.  Updated the WCSFM STA task description to account for a new task 2/4.A that was added to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
14	<p>7.2.11 – Table 2 Reactor Operator #1 (U1 Control Operator) Task Description</p> <p>A. U1 CR panel operations            B. U1 SDP operations</p>	<p>7.2.11 – Table 2 Reactor Operator #1 (U1 Control Operator) Task Description</p> <p>A. U1 CR panel operations            B. U1 SDP operations (sect 7)</p>	<p>Modified existing content.</p> <p>Updated the Reactor Operator #1 task description to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>
15	<p>7.2.11 – Table 2 Reactor Operator #2 (U2 Control Operator) Task Description</p> <p>A. U2 CR panel operations            B. U2 SDP operations</p>	<p>7.2.11 – Table 2 Reactor Operator #2 (U2 Control Operator) Task Description</p> <p>A. U2 CR panel operations            B. U2 SDP operations (sect 7)</p>	<p>Modified existing content.</p> <p>Updated the Reactor Operator #2 task description to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
16	<p>7.2.11 – Table 2 Reactor Operator #3 (Work Control Lead) Task Description</p> <p>A. Perform U1 / U2 CR panel operations            B. Direct U1 / U2 in-plant operations</p>	<p>7.2.11 – Table 2 Reactor Operator #3 (Work Control Lead) Task Description</p> <p>A. Electrical System Actions (sect 10)            B. 480 VAC Bus Alignment (sect 11)</p>	<p>Modified existing content.</p> <p>Updated the Reactor Operator #3 task description to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>
17	<p>7.2.11 – Table 2 Auxiliary Operator #1 (U1 Turbine Building Operator) Task Description</p> <p>In-plant / Local operations</p>	<p>7.2.11 – Table 2 Auxiliary Operator #1 (U1 Turbine Building Operator) Task Description</p> <p>A. Turbine Building Operator Actions (sect 9)            B. Locally Closing Main Steam Isolation Valves (sect 12)</p>	<p>Modified existing content.</p> <p>Updated the Auxiliary Operator #1 task description to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
18	<p>7.2.11 – Table 2 Auxiliary Operator #2 (U1 Aux Building Operator) Task Description</p> <p>Local actions at U1 DSDP</p>	<p>7.2.11 – Table 2 Auxiliary Operator #2 (U1 Aux Building Operator) Task Description</p> <p>Auxiliary Building Operator Actions (sect 8)</p>	<p>Modified existing content.</p> <p>Updated the Auxiliary Operator #2 task description to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>
19	<p>7.2.11 – Table 2 Auxiliary Operator #3 (U2 Turbine Building Operator) Task Description</p> <p>In-plant / Local operations</p>	<p>7.2.11 – Table 2 Auxiliary Operator #3 (U2 Turbine Building Operator) Task Description</p> <p>A. Turbine Building Operator Actions (sect 9)          B. Locally Closing Main Steam Isolation Valves (sect 12)</p>	<p>Modified existing content.</p> <p>Updated the Auxiliary Operator #3 task description to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>



#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
20	<p>7.2.11 – Table 2 Other (U2 Aux Building Operator) Task Description</p> <p>Local actions at U2 DSDP</p>	<p>7.2.11 – Table 2 Other (U2 Aux Building Operator) Task Description</p> <p>Auxiliary Building Operator Actions (sect 8)</p>	<p>Modified existing content.</p> <p>Updated the U2 Auxiliary Building Operator task description to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
21	<p>7.2.3 Appendix D Table Functions</p> <ol style="list-style-type: none"> <li>1. Plant Operations (status monitoring and EOP actions)</li> <li>2. NRC Emergency Telecommunications System</li> <li>3. NRC Event Notification</li> <li>4. NRC Event Notification</li> </ol>	<p>7.2.3 Appendix D Table Functions</p> <ol style="list-style-type: none"> <li>1. Plant Operations (status monitoring and EOP actions)</li> <li>2. CR Evacuation Actions</li> <li>3. NRC Emergency Telecommunications System</li> <li>4. NRC Event Notification</li> </ol>	<p>Modified existing content.</p> <p>Updated the WCSFM functions to account for the process changes made for Control Room (CR) fire response to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p>The inclusion of function #2 (CR Evacuation Actions) in this revision corrects an error of omission that was made during the original issuance of this Appendix. A copy and paste error was made in the original table that duplicated a function (NRC Event Notification). One of the duplicates should have been CR Evacuation Actions as these actions were applicable to this scenario. This change corrects that error and provides for an accurate listing of functions for this specific scenario.</p> <p><b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b></p>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
22	7.2.3 Appendix D Table Responsibility (Task)  1.1 STA tasks (2/4) 2.1 Activate ERDS (5/11) 3.1 Perform NRC notifications (5/13) 4.2 Perform NRC notifications (5/13)	7.2.3 Appendix D Table Responsibility (Task)  1.1 STA tasks (2/4.B) 2.1 Dispatch Operators (2/4.A) 3.1 Activate ERDS (5/11) 4.2 Perform NRC notifications (5/13)	Modified existing content.  Updated the WCSFM tasks to account for the process changes made for CR fire response to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>
23	7.2.3 Appendix D Table Action Step  1.1.1 OP1.DC10 2.1.1 EP G-2, Att 2, Step 2.a. 3.1.1 EP G-2, Att 6.3 (Comm #1 Checklist) 4.2.1 EP G-2, Att 6.3 (Comm #1 Checklist)	7.2.3 Appendix D Table Action Step  1.1.1 OP1.DC10 2.1.1 OP AP-8A 3.1.1 EP G-2, Att 2, Step 2.a. 4.2.1 EP G-2, Att 6.3 (Comm #1 Checklist)	Modified existing content.  Updated the WCSFM action steps to account for the process changes made for CR fire response to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>

#	Revision 4.04 Content	Revision 4.05 Content	Reason for Change
24	7.2.3 Appendix D Table Duration  Thru Event 1 90 Thru Event	7.2.3 Appendix D Table Duration  Thru Event 10 1 Thru Event	Modified existing content.  Updated the WCSFM action durations to account for the process changes made for CR fire response to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>
25	7.2.3 Appendix E Table  N/A new content added	7.2.3 Appendix E Table  Time: 08:39  Plant/equipment/environmental events and conditions applicable to the functions and tasks: Actions completed in the Control Room (CR). Refer to section 3.4.2.11 for event and conditions description.  Task / Action Step description (start & stop): Dispatch operators per OP AP-8A Section 6 (08:39 – 08:49)	Modified existing content.  Updated the WCSFM timeline to account for the process changes made for CR fire response to align with the change from Appendix R to NFPA 805. This change supports implementation of the NFPA 805 FPP, as per License Amendments 225 and 227, which supersedes the FPP that was based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.  <b>10 CFR 50.54(q) Effectiveness Evaluation 2017-12 documents the detailed analysis of this change.</b>

**Summary of the Analysis of Changes to  
Emergency Plan, Section 5  
Organizational Control of Emergencies**

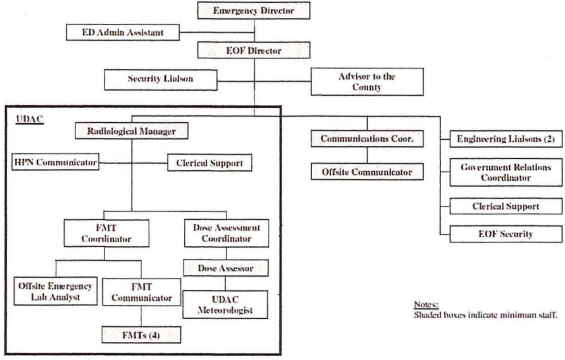
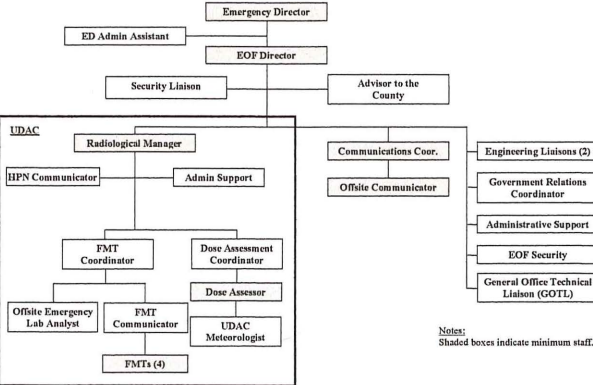
**Summary of the Analysis of Changes to Emergency Plan, Section 5**

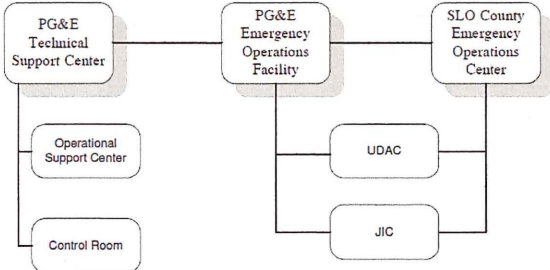
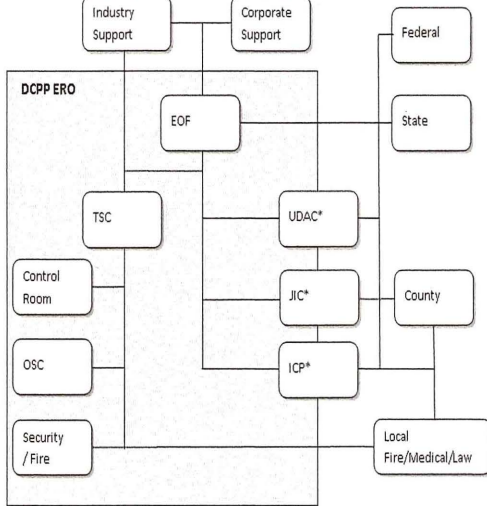
#	Original Content	Proposed Content	Reason for Change
1	Clerical (throughout the document)	Administrative (throughout the document)	<p>Modified existing content. Title change only. No change in responsibilities or tasks.</p> <p>Clerical was replaced with administrative throughout for consistency.</p> <p><b>No additional evaluation necessary.</b></p>
2	<p>Section 5.1</p> <p>The Site Vice President reports to the Chief Nuclear Officer and has overall responsibility for in-plant functions, ISFSI functions, and plant-corporate interfaces.</p> <p>Section 5.1.1</p> <p>The Site Vice President has responsibility for overall emergency preparedness at DCPD and Diablo Canyon ISFSI.</p>	<p>Section 5.1</p> <p>The vice president nuclear generation reports to the Chief Nuclear Officer and has overall responsibility for in-plant functions, ISFSI functions, and plant-corporate interfaces.</p> <p>Section 5.1.1</p> <p>The vice president nuclear generation has responsibility for overall emergency preparedness at DCPD and Diablo Canyon ISFSI.</p>	<p>Modified existing content. Title change only. No change in responsibilities or tasks.</p> <p>Site Vice President was replaced with vice president nuclear generation. This editorial correction aligns with the new generation organizational titles and ensures the E-Plan remains technically accurate.</p> <p><b>No additional evaluation necessary.</b></p>
3	<p>Section 5.3.7</p> <p><b>Security Watch Commander</b></p> <p>This is a normal plant organization position located in the Security Building and which is responsible for onsite emergency assembly and accountability, the results of which are reported to the Site Emergency Coordinator.</p>	<p>Section 5.3.7</p> <p><b>Security Watch Commander</b></p> <p>The Security Watch Commander is a normal plant organization position that is generally located in the main Protected Area, but may be located elsewhere depending on security strategy. The Security Watch Commander is responsible for onsite emergency assembly and accountability, the results of which are reported to the Site Emergency Coordinator.</p>	<p>Modified existing content.</p> <p>It was determined that the Diablo Canyon Watch Commander may be in a variety of places based on security strategy and lessons learned from Force on Force drills. This change aligns the E-Plan with the physical security plan and current security strategy. There are no changes to responsibilities.</p> <p><b>No additional evaluation necessary.</b></p>

#	Original Content	Proposed Content	Reason for Change
4	<p>Section 5.6.3.5</p> <p>Prior to UDAC activation, assisting with PAR development based on Control Room dose assessment.</p>	<p>Section 5.6.3.5</p> <p>Prior to UDAC activation, assisting with PAR development based on Control Room or TSC dose assessment.</p>	<p>Modified existing content.</p> <p>Section 5.6.3.5 is updated to include TSC dose assessment. The TSC has the capability to perform dose assessment, and adding it to the E-Plan is an enhancement to more fully describe this capability.</p> <p>The TSC already has the ability to perform dose assessments and may do so per existing guidance in EP EF-1. This change documents that TSC dose assessment may be used as a resource to assist with Protective Action Recommendation (PAR) development if necessary. Emergency Response Organization (ERO) positions responsible for dose assessment and PARs in the TSC are trained and qualified to perform these tasks. As such, this change does not result in any new responsibilities or tasks for ERO positions that did not already have them.</p> <p><b>No additional evaluation necessary.</b></p>
5	<p>N/A – New content (additions to sections 5.8(5) &amp; 5.8.21).</p>	<p>This change impacts multiple sections. They are listed below:</p> <p><u>Section 5.8(5)</u></p> <p>The General Office Technical Liaison (GOTL) coordinates with the Government Relations Coordinator to ensure alignment between DCPD and corporate response.</p> <p><u>Section 5.8.21</u></p> <p><b>General Office Technical Liaison</b></p> <p>The General Office Technical Liaison is responsible for the following activities:</p> <p>Providing a single point of contact between the EOF and the company emergency operations center.</p> <p>Responding to the company emergency operations</p>	<p>Added new content.</p> <p>The General Office Technical Liaison (GOTL) is being added to the E-Plan. This is reflected in sections 5.8(5), 5.8.21, 5.18, and 5.22.</p> <p>In recent years the position has evolved into its own unique position separate from the Government Relations Coordinator with its own qualification guide (EP-83) and a procedure checklist in EP EF-3.</p> <p>The position participates in drills and is now assigned to on-call rotations. The personnel that fill the position are also in the ERO call out system.</p> <p>This change formally adds the position to the E-Plan based on changes noted above. The GOTL is a</p>

#	Original Content	Proposed Content	Reason for Change																				
	<p>center when requested or directed to do so.</p> <p>Coordinating with the Government Relations Coordinator to ensure alignment between DCPD and corporate response.</p> <p><u>Section 5.18, Table 5-1B</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Functional Area</th> <th style="width: 15%;">Major Tasks</th> <th style="width: 20%;">Emergency Positions</th> <th style="width: 10%;">*60 Minute</th> <th style="width: 10%;">Full Augmentation</th> </tr> </thead> <tbody> <tr> <td>3. Notification &amp; Communication</td> <td>Governmental</td> <td>Offsite Communicator Advisor to the County Government Relations Coordinator</td> <td style="text-align: center;">1</td> <td style="text-align: center;">1 1</td> </tr> </tbody> </table>	Functional Area	Major Tasks	Emergency Positions	*60 Minute	Full Augmentation	3. Notification & Communication	Governmental	Offsite Communicator Advisor to the County Government Relations Coordinator	1	1 1	<p>center when requested or directed to do so.</p> <p>Coordinating with the Government Relations Coordinator to ensure alignment between DCPD and corporate response.</p> <p><u>Section 5.18, Table 5-1B</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Functional Area</th> <th style="width: 15%;">Major Tasks</th> <th style="width: 20%;">Emergency Positions</th> <th style="width: 10%;">*60 Minute</th> <th style="width: 10%;">Full Augmentation</th> </tr> </thead> <tbody> <tr> <td>3. Notification &amp; Communication</td> <td>Governmental</td> <td>Offsite Communicator Advisor to the County Government Relations Coordinator General Office Technical Liaison</td> <td style="text-align: center;">1</td> <td style="text-align: center;">1 1 1</td> </tr> </tbody> </table> <p>Note that this increases the total staff for full augmentation from 39 to 40 (page 45)</p>	Functional Area	Major Tasks	Emergency Positions	*60 Minute	Full Augmentation	3. Notification & Communication	Governmental	Offsite Communicator Advisor to the County Government Relations Coordinator General Office Technical Liaison	1	1 1 1	<p>support staff position and as such is not required to activate the Emergency Operations Facility (EOF).</p> <p>This change is being made to align the E-Plan with the current operating philosophy with respect to how the GOTL position is staffed, trained, and qualified.</p> <p><b>No additional evaluation necessary.</b></p>
Functional Area	Major Tasks	Emergency Positions	*60 Minute	Full Augmentation																			
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	<p><b>Section 5.22, Figure 5-4, EOF Organization</b></p>  <p><i>Notes:</i> Shaded boxes indicate minimum staff.</p>	<p><b>Section 5.22, Figure 5-4, EOF Organization</b></p>  <p><i>Notes:</i> Shaded boxes indicate minimum staff.</p>	
6	<p><b>Section 5.9.7.1</b></p> <p>Operating the computer and projector system used to display graphics and other information during media briefings.</p>	<p><b>Section 5.9.7.1</b></p> <p>Operating the computer and display system used to project graphics and other information during media briefings.</p>	<p>Modified existing content.</p> <p>Section 5.9.7 is updated to reflect that the Joint Information Center (JIC) uses a display system, not a projector, to project graphics during media briefings.</p> <p>The JIC was recently updated with new equipment to enhance media briefing capabilities. Part of the update included replacing the projector with smart TVs that display graphics via a HDMI cable. These changes were made based on ERO feedback from multiple drills. Replacing “projector” with “display” aligns the E-Plan with EP EF-10, and the current process. This change was initially evaluated under 50.54(q) screening evaluation 2016-28. The projection/display functionality will still be provided and no ERO responsibilities are being assigned or removed. This change ensures that the E-Plan remains technically accurate.</p> <p><b>No additional evaluation necessary.</b></p>

#	Original Content	Proposed Content	Reason for Change
7	<p>Section 5.10, Figure 1</p> 	<p>Section 5.10, Figure 1</p>  <p><small>* UDAC, JIC and ICP may be staffed by DCPPE, Federal, State and/or County personnel</small></p>	<p>Modified existing content.</p> <p>This change was identified during the EP licensing basis verification project and conformance review. This change updates a figure to better display the facility functional relationships between DCPPE ERO and offsite organizations. This revised figure more closely aligns with the SSER E-Plan Rev 3.03 and NUREG-0654 element B.6.</p> <p>NUREG-0654 element B.6 requires illustration of interface, and this change continues to meet this requirement. These relationships are defined in detail in other parts of section 5 of the E-Plan. Updating this figure does not alter the described interfaces.</p> <p><b>No additional evaluation necessary.</b></p>
8	<p>N/A – New content.</p>	<p>Section 5.12.1</p> <p>Emergency notifications and communications with these support organizations are via the San Luis Obispo County Dispatch Center.</p>	<p>Added new content.</p> <p>This change was identified during the EP licensing basis verification project and conformance review. It adds a sentence to clarify that offsite notifications use the San Luis Obispo County Dispatch Center. This new language aligns the E-Plan with NUREG-0654 element F.2.</p> <p>The added statement does not alter the method of communications with medical support facilities. This addition will provide a robust barrier against loss of the planning standard commitment with future E-Plan or EPIP changes.</p> <p><b>No additional evaluation necessary.</b></p>

#	Original Content	Proposed Content	Reason for Change
9	Section 5.12.2.7) Marian Medical Center	Section 5.12.2.7) Marian Regional Medical Center	Modified existing content. Editorial correction to update title of Marian Medical Center to Marian Regional Medical Center. <b>No additional evaluation necessary.</b>
10	Section 5.12.2 Rogers Helicopters, Inc.	Section 5.12.2.8) PG&E Company Helicopter Operations Department	Modified existing content. Rogers Helicopters was replaced with PG&E Company Helicopter Operations Department because sourcing terminated PG&E's contract with Rogers Helicopters. <b>Refer to 50.54(q) effectiveness evaluation 2017-07 for further evaluation on this change.</b>

**Summary of the Analysis of Changes to  
Emergency Plan  
Coversheet**

**Summary of the Analysis of Changes to Emergency Plan, Coversheet**

#	Revision 4.00 Content	Revision 4.01 Content	Reason for Change
1	D.H. Oatley Vice President, Diablo Canyon Operations	James Welsch Vice President, Nuclear Generation	Editorial change to reflect current Vice President.