



Decemeber 21, 2017

PG&E Letter DCL-17-113
PG&E Letter DIL-17-014

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 Implementing Procedure Update

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54 and the requirements of 10 CFR 72.32, Pacific Gas and Electric Company (PG&E) is providing a summary of the analysis of changes to Emergency Plan (E-Plan) Implementing Procedure OM10.ID1, "Maintaining Emergency Preparedness."

The associated enclosures are listed below:

- Enclosure 1 - Diablo Canyon Power Plant Emergency Plan Implementing Procedures, Revision Numbers for Emergency Plan Implementing Procedures
- Enclosure 2 - Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 17, "Maintaining Emergency Preparedness"

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 of 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 me at (805) 545-3446.

Sincerely,

 for Mike Ginn 12/21/17

Michael A. Gihn
Emergency Planning Manager

armb/4743/50952900

Enclosures

cc/enc: William C. Allen, 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-17-113
PG&E Letter DIL-17-014

**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

Revision Numbers for Emergency Plan Implementing Procedures

**DIABLO CANYON POWER PLANT EMERGENCY PLAN
 IMPLEMENTING PROCEDURES**

<u>Proc. No.</u>	<u>Rev.</u>	<u>Title</u>
OM10.ID1	17*	Maintaining Emergency Preparedness
OM10.DC1	8	Emergency Preparedness Drills and Exercises
EP G-1	44	Emergency Classification and Emergency Plan Activation
EP G-2	50	Interim Emergency Response Organization
EP G-3	59	Emergency Notification of Off-Site Agencies
EP G-4	30	Assembly and Accountability
EP G-5	14	Evacuation of Non-Essential Site Personnel
EP OR-3	10	Emergency Recovery
EP RB-1	8	Personnel Dosimetry
EP RB-2	8	Emergency Exposure Guides
EP RB-3	7	Stable Iodine Thyroid Blocking
EP RB-4	5	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	8	Alternate Personnel Decontamination Facilities
EP RB-8	28	Instructions for Field Monitoring Teams
EP RB-9	15	Calculation of Release Rate
EP RB-10	19	Protective Action Recommendations
EP RB-11	14	Emergency Offsite Dose Calculations
EP RB-12	11	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	9	Core Damage Assessment Procedure
EP RB-14A	2	Initial Detection of Fuel Cladding Damage
EP RB-15	15	Post Accident Sampling System
EP RB-16	14	Operating Instructions for the EARS Computer Program
EP R-2	34	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	9	Release of Radioactive Liquids
EP R-7	17	Off-Site Transportation Accidents
EP EF-1	53	Activation and Operation of the Technical Support Center
EP EF-2	40	Activation and Operation of the Operational Support Center
EP EF-3	44	Activation and Operation of the Emergency Operations Facility
EP EF-4	21	Activation of the Off-Site Emergency Laboratory
EP EF-9	12	Backup Emergency Response Facilities
EP EF-10	17	Activation and Operation of the Joint Information Center
EP EF-11	2	Alternate Emergency Response Facilities / Incident Command Post (ICP)

***Revised Document**

Enclosure 2
PG&E Letter DCL-17-113
PG&E Letter DIL-17-014

**Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure OM10.ID1, Revision 17, "Maintaining
Emergency Preparedness"**

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 17

Change #	Original Content	Content Change	Justification/Impact of Change
1	<p>Step 3.5</p> <p>Qual Cards: Guidance documents used to ensure all initial qualification requirements are met. Qual cards are not quality related documents. Attendance records used for plant information management system (PIMS) entry are quality related.</p>	<p>Step 3.5</p> <p>Qualification Guides: Guidance documents used to ensure all initial qualification requirements are met. Qualification guides are not quality related documents. Attendance records used for SAP entry are quality related.</p>	<p>Change #1 – Modified existing content.</p> <p>Updated terminology from qual card to qualification guide to align with current nomenclature.</p> <p>Also updated PIMS to SAP to align with current Diablo Canyon Power Plant (DCPP) processes.</p> <p>This change does not affect how the current Emergency Plan (E-Plan) meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
2	<p>Step 4.2.1</p> <p>Assessing ERO team performance, including evaluation of missed drill and exercise (DEP) and performance indicator (PI) opportunities resulting from drills and approving remediation plans to remedy an unacceptable level of performance.</p>	<p>Step 4.2.1</p> <p>Assessing ERO team performance, including evaluation of missed drill and exercise (DEP) and performance indicator (PI) opportunities resulting from actual events or drills and approving remediation plans to remedy an unacceptable level of performance.</p>	<p>Change #2 – Modified existing content.</p> <p>Added in actual events to the scope of assessment for Emergency Response Organization (ERO) performance.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
3	<p>Step 4.2.2</p> <p>Raising issues to the ERO leadership team that have the potential to impact emergency preparedness.</p>	<p>Step 4.2.2</p> <p>Raising issues to the ERO leadership team having the potential to impact emergency preparedness.</p>	<p>Change #3 – Modified existing content.</p> <p>Editorial change. Removed "that" and changed "have" to "having".</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
4	<p>Step 4.2.3</p> <p>Providing the ERO leadership team with</p>	<p>Step 4.2.3</p> <p>Providing the ERO leadership team with</p>	<p>Change #4 – Modified existing content.</p> <p>Editorial change. Added in "indicator data" to make the</p>

Change #	Original Content	Content Change	Justification/Impact of Change
	team specific metrics for DEP performance and vacancies.	team specific metrics for DEP performance indicator data and ERO vacancies.	content more accurate. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
5	Step 5.1.1.k Communicate issues to the ERO leadership team that have the potential to impact emergency preparedness. ^{T36573}	Step 5.1.1.k Communicate issues to the ERO leadership team having the potential to impact emergency preparedness. ^{T36573}	Change #5 – Modified existing content. Editorial change. Removed "that" and changed "have" to "having". This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
6	Step 5.3.2 Failure of a drill and exercise program performance indicator (DEP PI) shall require an evaluation of individual and/or ERO team qualifications and the subsequent development of remediation plan(s). ^{T36233}	Step 5.3.2 Failure of a drill and exercise (DEP) performance indicator (PI) should require an evaluation of individual and/or ERO team qualifications and the subsequent development of remediation plan(s). ^{T36233}	Change #6 – Modified existing content. Changed "shall" to "should". This change aligns OM10.ID1 with AWP EP-001 for consistency. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
7	Step 5.4.1.a Every 24 months, at a minimum, a full assessment that reviews all elements of the emergency preparedness program shall be conducted by quality verification (QV), including verification of the state and local interface, while maintaining independence from the assessment itself.	Step 5.4.1.a Every 24 months, at a minimum, a full assessment reviewing all elements of the emergency preparedness program shall be conducted by quality verification (QV), including verification of the state and local interface, while maintaining independence from the assessment itself.	Change #7 – Modified existing content. Editorial change. Removed "that". This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
8	Step 5.4.3 The portion of the annual assessment	Step 5.4.3 The portion of the annual assessment	Change #8 – Modified existing content. Editorial change. Replaced "local" with "county" to

Change #	Original Content	Content Change	Justification/Impact of Change
	involving the state and local interface shall be made available to the state and local Office of Emergency Services (OES).	involving the state and local interface shall be made available to the state and county Office of Emergency Services (OES).	make the content more accurate. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
9	Step 5.5.1 A database containing the following information on ERO personnel shall be maintained: <ul style="list-style-type: none"> • Name of individual assigned to the position • Telephone number • Pager number (if applicable) 	Step 5.5.1 A database containing the following information on ERO personnel shall be maintained: <ul style="list-style-type: none"> • Name of individual assigned to the position • Telephone number • City of residence • Pager number (if applicable) 	Change #9 – Modified existing content. Added in "city of residence" to update the procedure to reflect all of the data Emergency Planning currently collects on ERO personnel. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
10	Step 5.6.1 Public education materials shall be provided to the public at least once per calendar year:	Step 5.6.1 Public education materials shall be provided to the public within the Emergency Planning Zone (EPZ) at least once per calendar year.	Change #10 – Modified existing content. Added "within the Emergency Planning Zone (EPZ)". This change provides for better alignment with E-Plan Section 8.2.3 content, "Educational information is distributed to the public within the Emergency Planning Zone." This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
11	Step 5.6.1 a. San Luis Obispo County Telephone Directory Emergency Information: Provided annually to be published with issuance of the telephone directory.	Step 5.6.1 a. Emergency information describing DCCP, radiation and its health effects, warning procedures and protective actions is revised and distributed annually to persons residing or doing business in the Emergency Planning Zone (e.g., telephone book,	Change #11 – Modified existing content. The Revision 17 content consistent with E-Plan Section 8.2.3.1. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional

Change #	Original Content	Content Change	Justification/Impact of Change
		calendar).	evaluation required.
12	Step 5.6.1 N/A – new content added	Step 5.6.1 b. Additional information describing warning procedures and protective actions is distributed to all residents in the EPZ. c. The public is advised that information is available separately for those without phone books.	Change #12 – Added new content. The Revision 17 content is consistent with E-Plan Section 8.2.3.1. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
13	Step 5.6.1 c. Siren Information Stickers: Mailed to businesses, motels and hotels once per calendar year usually in the spring.	Step 5.6.1 e. Siren information stickers are provided to businesses and organizations (e.g., hotels, motels and places of public assembly) accommodating transient populations within the EPZ. 1. These stickers advise tuning into a local TV or radio station if a steady siren sounds for 3 to 5 minutes.	Change #13 – Modified existing content. The Revision 17 content is consistent with E-Plan Sections 8.2.3.1 and 8.2.3.4. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
14	Step 5.6.1 d. Siren Postcards: Mailed to residents and businesses within the EPZ (PAZs 1-12) once per calendar year.	Step 5.6.1 f. Siren postcards are mailed to residents and businesses within the EPZ (PAZs 1-12) once per calendar year.	Change #14 – Modified existing content. Editorial change. Removed the colon after "Postcards" and added in "are" before "mailed". This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.
15	Step 5.6.1 e. Montana de Oro Brochure: Published as needed to provide emergency information to people touring the park.	Step 5.6.1 g. Montana de Oro brochure is published as needed to provide emergency information to people touring the park.	Change #15 – Modified existing content. Editorial change. Removed the colon after "brochure" and added in "is" before "published".

Change #	Original Content	Content Change	Justification/Impact of Change
			<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
16	<p>Step 5.6.1</p> <p>N/A – new content added</p>	<p>Step 5.6.1</p> <p>h. Information on warning procedures and protective actions are provided to key groups within the EPZ.</p> <p>i. Signs are posted in parks and scenic locations within the EPZ with instructions of what to do if sirens sound.</p> <p>j. When requested, trained spokespersons present information on warning procedures and protective actions to civic and other groups throughout the EPZ.</p> <p>k. News media staff (editors, reporters, newsroom personnel, etc.) are offered special programs annually to acquaint them with the power plant and its characteristics, emergency plans, radiation and radioactive effects, and points of contact for public information releases in an emergency.</p>	<p>Change #16 – Added new content.</p> <p>The Revision 17 content is consistent with E-Plan Sections 8.2.3.3, 8.2.3.4, and 8.2.3.5.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
17	<p>Step 5.6.2</p> <p>b. Clearly state that those individuals who are not within the declared evacuation area should not evacuate.</p>	<p>Step 5.6.2</p> <p>b. Clearly state individuals who are not within the declared evacuation area should not evacuate.</p>	<p>Change #17 – Modified existing content.</p> <p>Editorial change. Removed "that those".</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
18	<p>Step 5.6.2</p>	<p>Step 5.6.2</p>	<p>Change #18 – Added new content.</p>

Change #	Original Content	Content Change	Justification/Impact of Change
	N/A – new content added	c. Include the need for the public to monitor information channels for updated direction.	<p>This content was added from NUREG-0654 Supplement 3 (Revision 1), Section 3.1.</p> <p>This change does not result in a reduction in effectiveness of the E-Plan, therefore, prior NRC approval is not required. Refer to 50.54(q) 2017-43 for additional evaluation on this change.</p>
19	<p>Step 5.6.2</p> <p>c. Define the term "shadow evacuation" and note that this type of evacuation has the potential to impede the outbound traffic flow, slowing the evacuation from the affected area.</p>	<p>Step 5.6.2</p> <p>d. If offsite response organizations (OROs) use this strategy, explain the purpose of staged evacuation as allowing those closest to the plant to evacuate unimpeded.</p> <p>1. Materials should define the term "shadow evacuation" and note this type of evacuation has the potential to impede the outbound traffic flow, slowing evacuation from the affected area.</p>	<p>Change #19 – Modified existing content.</p> <p>This content was modified to provide for better alignment with NUREG-0654 Supplement 3 (Revision 1), Section 3.1.</p> <p>This change does not result in a reduction in effectiveness of the E-Plan, therefore, prior NRC approval is not required. Refer to 50.54(q) 2017-43 for additional evaluation on this change.</p>
20	<p>Step 5.6.2</p> <p>g. If the offsite response organization (ORO) program includes potassium iodide (KI), include what to do if KI is not available (e.g., residents cannot find KI, or they do not have it with them).</p>	<p>Step 5.6.2</p> <p>h. If the ORO program includes potassium iodide (KI), explain what to do if KI is not available (e.g., residents cannot find KI, or they do not have it with them).</p> <p>1. Residents should understand KI is an additional precaution, and they still should be safe if KI has been recommended but is inaccessible.</p>	<p>Change #20 – Modified existing content.</p> <p>This content was modified to provide for better alignment with NUREG-0654 Supplement 3 (Revision 1), Section 3.1.</p> <p>This change does not result in a reduction in effectiveness of the E-Plan, therefore, prior NRC approval is not required. Refer to 50.54(q) 2017-43 for additional evaluation on this change.</p>
21	<p>Step 6.2.2</p> <p>Qual cards are non-quality good business records.</p>	<p>Step 6.2.2</p> <p>Qualification guides are non-quality good business records.</p>	<p>Change #21 – Modified existing content.</p> <p>Updated terminology from qual card to qualification guide to align with current nomenclature.</p> <p>This change does not affect how the current E-Plan</p>

Change #	Original Content	Content Change	Justification/Impact of Change
			<p>meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
22	N/A – New Content Added	Attachment 1 - Emergency Planning Program Weekly Requirements	<p>Change #22 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities. This attachment does not add any new programmatic requirements.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
23	N/A – New Content Added	Attachment 2 - Emergency Planning Program Bi-Weekly Requirements	<p>Change #23 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities. This attachment does not add any new programmatic requirements.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
24	N/A – New Content Added	Attachment 3 - Emergency Planning Program Monthly Requirements	<p>Change #24 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities. This attachment does not add any new programmatic requirements.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>

Change #	Original Content	Content Change	Justification/Impact of Change
25	N/A – New Content Added	Attachment 4 - Emergency Planning Program Quarterly Requirements	<p>Change #25 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities.</p> <p>This attachment adds one new programmatic requirement; Emergency Response Organization Augmentation Program. This new program is not required by the E-Plan.</p> <p>The new program establishes testing requirements and measurement standards as a means of evaluating DCP's ability to perform ERO augmentation under a variety of conditions.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
26	N/A – New Content Added	Attachment 5 - Emergency Planning Program Semi-Annual Requirements	<p>Change #26 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities. This attachment does not add any new programmatic requirements.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
27	N/A – New Content Added	Attachment 6 - Emergency Planning Program Annual Requirements	<p>Change #27 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities. This attachment does not add any new programmatic requirements.</p>

Change #	Original Content	Content Change	Justification/Impact of Change
			<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
28	N/A – New Content Added	Attachment 7 - Emergency Planning Program Biennial Requirements	<p>Change #28 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities.</p> <p>This attachment adds one new programmatic requirement; Emergency Response Organization Augmentation Program. This new program is not required by the E-Plan.</p> <p>The new program establishes testing requirements and measurement standards as a means of evaluating DCP's ability to perform ERO augmentation under a variety of conditions.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
29	N/A – New Content Added	Attachment 8 - Emergency Planning Program Periodic Requirements	<p>Change #29 – Added new content.</p> <p>This attachment was added to provide a tool for tracking all E-Plan core business activities. This attachment does not add any new programmatic requirements.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>

Change #	Original Content	Content Change	Justification/Impact of Change
30	N/A – New Content Added	Attachment 9 - ERO Augmentation Response Time Program	<p>Change #30 – Added new content.</p> <p>This attachment was added to provide a tool for measuring the effectiveness of the new Emergency Response Organization Augmentation Program. This new program is not required by the E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>