



**Pacific Gas and
Electric Company**

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PG&E Letter DCL-18-029
PG&E Letter DIL-18-006

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 Implementing Procedure Update

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54(q)(5) 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 EP RB-8, "Instructions for Field Monitoring Teams."

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 EP RB-8, Revision 29, "Instructions for Field Monitoring Teams"

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."

A member of the STARS Alliance

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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,

A handwritten signature in black ink, appearing to read 'm e A G' followed by a horizontal line.

Michael A. Ginn
Emergency Planning Manager

armb/4743/50970254

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-18-029
PG&E Letter DIL-18-006

**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	9	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	29*	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**

**Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP RB-8, Revision 29, “Instructions for
Field Monitoring Teams”**

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-8, Revision 29

Original Content	Description of Content Change	Type of Change and Reason for Change
N/A – Added new content	<p>Step 2.9</p> <p>The intent of Attachment 9, “FMT Checklist” is that it be used in lieu of the Section 6 step-by-step detailed guidance. The procedure Section 6 detailed instructions are designed for field monitoring team (FMT) members who are not ANSI qualified radiation protection (RP) technicians; trained and qualified to perform these functions, but with less proficiency because their daily jobs do not provide them with opportunity to develop these skills to a high level. ANSI RP technicians and FMT members with a long history of participating as FMTs are able to complete all of the field monitoring RP functions of this procedure by following the more direct, simplified checklist. The checklist references the Section 6 step(s) to obtain additional guidance, not provided in the checklist, if needed by the user.</p>	<p>Change #1 – Added new content.</p> <p>Add a checklist as an aid to the FMT members to be used in lieu of Section 6 step-by-step instructions, streamlining the completion of FMT tasks, while reducing the chance of human error.</p> <p>No additional evaluation is required.</p>
<p>Step 3.2</p> <p>The FMT Communicator at the EOF is responsible for providing the on-site FMT tailboard, assignment of the FMT leader, and dispatch command and control. In the absence of the FMT Communicator, the Radiological Manager at the EOF may assign the FMT leader and provide the on-site</p>	<p>Step 3.2</p> <p>The FMT Communicator at the Emergency Operations Facility (EOF) is responsible for providing the on-site FMT tailboard, assignment of the FMT leader, and dispatch command and control. In the absence of the FMT Communicator, the Radiological Manager at the EOF may assign the FMT leader and provide the on-site FMT tailboard.</p>	<p>Change #2 – Modified existing content.</p> <p>Corrected a typographical error.</p> <p>No additional evaluation is required.</p>

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-8, Revision 29

Original Content	Description of Content Change	Type of Change and Reason for Change
FMT tailboard.		
<p>Step 3.3</p> <p>The EOF FMT Coordinator at the EOF is responsible for providing the off-site FMT tailboard and dispatch command and control. In the absence of the FMT Coordinator, the Radiological Manager may provide the off-site FMT tailboard.</p>	<p>Step 3.3</p> <p>The FMT Coordinator at the EOF is responsible for providing the off-site FMT tailboard and dispatch command and control. In the absence of the FMT Coordinator, the Radiological Manager may provide the off-site FMT tailboard.</p>	<p>Change #3 – Modified existing content.</p> <p>Removed repetitive information.</p> <p>No additional evaluation is required.</p>
<p>N/A – Added new content</p>	<p>Note 1 after step 6.2.2:</p> <p>Steps 6.2.3 through 6.2.13 are written in a logical order based on the current/standard FMT pre-deployment process; however, these steps can be performed out of order as needed to accommodate rapid deployment of a team to intercept a plume from a release in progress.</p>	<p>Change #4 – Added new content.</p> <p>Provide direction on which activities in these steps of the procedure are allowed to be performed in any order during the normal process of pre-deployment and infield surveying and sampling so that the mission time in the radioactive plume can be minimized.</p> <p>No additional evaluation is required.</p>
<p>N/A – Added new content</p>	<p>Note 2 after step 6.2.2:</p> <p>Attachment 9, “FMT Checklist” is a user aid that includes all actions directed by Section 6 of this procedure. The checklist references Section 6 step(s) for additional</p>	<p>Change #5 – Added new content.</p> <p>Add a checklist as an aid to the FMT members to be used in lieu of Section 6 step-by-step instructions, streamlining the completion of FMT tasks, while</p>

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-8, Revision 29

Original Content	Description of Content Change	Type of Change and Reason for Change
	guidance if needed by the user.	reducing the chance of human error. No additional evaluation is required.
N/A – Added new content	Step 6.2.10 Obtain an air sample stand.	Change #6 – Added new content. Directs the FMT members to obtain an air sample stand prior to deployment. No additional evaluation is required.
Note 1 after step 6.3.1 The steps in this section are written in a logical order based on the current/standard FMT pre-deployment process; however, these steps can be performed out of order as needed to accommodate rapid deployment of a team to intercept a plume from a release in progress.	Note 1 after step 6.3.1 Steps 6.3.2 through 6.3.8 are written in a logical order based on the current/standard FMT pre-deployment process; however, these steps can be performed out of order as needed to accommodate rapid deployment of a team to intercept a plume from a release in progress.	Change #7 – Modified existing content. Clarified steps that can be performed in any order. No additional evaluation is required.
N/A – Added new content	Step 6.3.4 Obtain an air sample stand.	Change #8 – Added new content. Reference Change #6. No additional evaluation is required.

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-8, Revision 29

Original Content	Description of Content Change	Type of Change and Reason for Change
<p>Step 6.4.1.g</p> <p>Wrap the dose rate probe with plastic wrap to protect it from contamination.</p>	<p>Step 6.4.1.g</p> <p>Sleeve the dose rate instrument, cable, and probe with plastic to protect them from contamination.</p>	<p>Change #9 – Modified existing content.</p> <p>Added direction to provide contamination control for the dose rate instrument.</p> <p>Reworded to allow the use of both plastic sleeving material and plastic wrap as necessary.</p> <p>No additional evaluation is required.</p>
<p>N/A – Added new content</p>	<p>Step 6.4.2.h</p> <p>Sleeve the count rate instrument and cable with plastic to protect them from contamination.</p>	<p>Change #10 – Added new content.</p> <p>Added direction to provide contamination control for the count rate instrument.</p> <p>Reworded to allow the use of both plastic sleeving material and plastic wrap as necessary.</p> <p>No additional evaluation is required.</p>

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-8, Revision 29

Original Content	Description of Content Change	Type of Change and Reason for Change
N/A – Added new content	<p>Step 6.4.7</p> <p>Set up the FMT vehicle for contamination control.</p>	<p>Change #11 – Added new content.</p> <p>Enhanced contamination control instructions regarding field monitoring vehicles for consistent performance and decreased redeployment preparation time for the next in-plume monitoring mission.</p> <p>No additional evaluation is required.</p>
<p>Note before section 6.6</p> <p>The following sections correspond to the order of radiological data entry on the Field Data Sheet (Attachment 7); however, the various samples and surveys can be done in any order or concurrently as the situation dictates or as prioritized by the FMT Communicator.</p>	<p>Note moved to before step 6.6.2</p> <p>Steps 6.6.2 through 6.6.5 correspond to the order of radiological data entry on the Field Data Sheet (Attachment 7); however, the various samples and surveys can be done in any order, or concurrently as the situation dictates, or as prioritized by the FMT Communicator.</p>	<p>Change #12 – Modified existing content.</p> <p>Moved to precede the applicable steps and clarified that the steps can be performed in any order.</p> <p>No additional evaluation is required.</p>

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-8, Revision 29

Original Content	Description of Content Change	Type of Change and Reason for Change
N/A – Added new content	<p>Step 6.10.1</p> <p>Provided additional detail for accessing PIC#3 in the PG&E switchyard near the Morro Bay Power Plant during normal working hours and after hours.</p>	<p>Change #13 – Added new content.</p> <p>Added direction to access PIC #3 if directed to read PIC #3 locally.</p> <p>No additional evaluation is required.</p>
<p>Attachment 5:</p> <p>PIC #2 SSW Corner of Target Range (near on-site field monitoring location, (SE,B).</p>	<p>Attachment 5:</p> <p>PIC #2 SSW Corner of Target Range (near on-site field monitoring location, SE,B).</p>	<p>Change #14 – Modified existing content.</p> <p>Corrected a typographical error.</p> <p>No additional evaluation is required.</p>
<p>Attachment 5:</p> <p>PIC #3 Morro Bay Power Plant, near front.</p>	<p>Attachment 5:</p> <p>PIC #3 Morro Bay Power Plant (in the switchyard at the base of the microwave tower).</p>	<p>Change #15 – Modified existing content.</p> <p>Changed to reflect the new location of PIC #3.</p> <p>See 50.54(q) 2017-40 for further information on this change.</p>
<p>Attachment 5:</p> <p>PIC #4 Montana de Oro State Park. At the Park Ranger's residence, adjacent to the siren.</p>	<p>Attachment 5:</p> <p>PIC #4 Montana de Oro State Park (at the Park Ranger's residence, adjacent to the siren).</p>	<p>Change #16 – Modified existing content.</p> <p>Changed format for consistency.</p> <p>No additional evaluation is required.</p>

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-8, Revision 29

Original Content	Description of Content Change	Type of Change and Reason for Change
Attachment 7 #5 Skyline	Attachment 7 #5 Skyshine	Change #17 – Modified existing content. Corrected a typographical error. No additional evaluation is required.
N/A – Added new content	Attachment 9 FMT Checklist Added a checklist for FMT actions, categorized by major actions, such as “Prepare to be dispatched” and “At FMT monitoring location” to be used in lieu of step by step instructions in Section 6.	Change #18 - Added new content. Add a checklist as an aid to the FMT members. This streamlines the completion of FMT tasks, while reducing the chance of human error. No additional evaluation is required.