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PG&E Letter DCL-18-044
PG&E Letter DIL-18-008

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

10 CFR 50.54
10 CFR 72.32
10 CFR 72.44(f)

Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

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

Dear Commissioners and Staff:

In accordance with the requirements of 10 CFR 50.54, 10 CFR 72.32, and 10 CFR 72.44(f), Pacific Gas and Electric Company (PG&E) is providing a summary of the analysis of changes to the Emergency Plan in the associated enclosures listed below:

- Enclosure 1 - Diablo Canyon Power Plant Emergency Plan Table of Contents
- Enclosure 2 - Summary of the Analysis of Changes in Emergency Plan Section 1, Revision 4.08, "Definitions & Abbreviations"
- Enclosure 3 - Summary of the Analysis of Changes in Emergency Plan Appendix A, Revision 4.08, "Procedures"

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 Part 50 and the planning standards of 10 CFR 50.47(b). Therefore, PG&E concluded that prior NRC approval of the associated changes was not required.

This update does not contain any privacy or 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 Ginn at (805) 545-3446.

Sincerely,

Paula Gerfen for Jim Welsch

James M. Welsch
Vice President Nuclear Generation and Chief Nuclear Officer

jy1e/4609/50980213/50980214
Enclosures
cc/enc: William C. Allen, 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)

DIABLO CANYON POWER PLANT EMERGENCY PLAN

Emergency Plan Table of Contents

Diablo Canyon Power Plant Emergency Plan
Table of Contents

- **Section 1* - Definitions & Abbreviations**
- Section 2 - Scope and Applicability
- Section 3 - Summary of Emergency Plan
- Section 4 - Emergency Conditions
- Section 5 - Organizational Control of Emergencies
- Section 6 - Emergency Measures
- Section 7 - Emergency Facilities and Equipment
- Section 8 - Maintaining Emergency Preparedness
- Section 9 - Recovery
- Section 10 - References
- **Appendix A* - Procedures**
- Appendix B - Offsite Agency Support Documentation
- Appendix C - Non-Applicable NUREG-0654 Standards
- Appendix D - Emergency Action Level Technical Basis Manual
- Appendix E - Evacuation Time Estimates
- Appendix F - ERO On-Shift Staffing Analysis Report
- Appendix G - Protective Action Recommendation (PAR) Strategy Bases

***Revised Document**

Summary of the Analysis of Changes in

Emergency Plan Section 1, Revision 4.08

"Definitions & Abbreviations"

Summary of the Analysis of Changes in Emergency Plan Section 1, Revision 4.08

Change	Original Content (Rev 4.07)	Revised Content (Rev 4.08)	Reason for Change
1	The area immediately surrounding the exclusion area which contains residents, the total number and density of which are such that there is a reasonable probability appropriate protective measures could be taken in their behalf in the event of a serious accident (10 CFR 100.3). For Diablo Canyon Power Plant this is an area encompassed by a radius of 10,000 meters (6.2 statute miles); this includes PAZs one and two, and the ocean out to five nautical miles.	The area immediately surrounding the exclusion area which contains residents, the total number and density of which are such that there is a reasonable probability appropriate protective measures could be taken in their behalf in the event of a serious accident (10 CFR 100.3). For Diablo Canyon Power Plant, the LPZ is an area encompassed by a radius of 6 statute miles on land (PAZs one and two) and the ocean out to five nautical miles.	Modified exiting content Updated the definition of the Low Population Zone (LPZ) to align with recent changes to the DCPP FSAR. The proposed activity under this evaluation corrects a latent error in Section 1 of the E-Plan and establishes consistency between all sections of the current E-Plan by realigning the E-Plan definition of the LPZ with the source licensing basis (FSAR). The proposed activity does not result in any changes to emergency response planning area boundaries. The proposed activity continues to meet the intent of the regulatory definition of the LPZ. There will be no differences in how the E-Plan is implemented. The proposed activity does not remove or alter any PARs or alter the ETE analysis in any way. The proposed activity aligns Section 1 of the E-Plan with every other section of the E-Plan as the LPZ will be consistently described as PAZs 1 and 2 with the outer boundary being 6 miles. **The change to update the LPZ distance in section 1 of the E-Plan was evaluated under 50.54(q) effectiveness evaluation 2018-02, which concluded that prior NRC approval was not required.**

Summary of the Analysis of Changes in

Emergency Plan Appendix A, Revision 4.08

"Procedures"

Summary of the Analysis of Changes in Emergency Plan Appendix A, Revision 4.08

Change	Original Content (Rev 4.07)	Revised Content (Rev 4.08)	Reason for Change
1	Radiation Protection & Assessment (Immediate Operator Response) EP RB-8 Instructions for Field Monitoring Teams EP RB-9 Calculation of Release Rate EP RB-10 Protective Action Recommendations EP RB-11 Emergency Offsite Dose Calculations EP RB-12 Plant Vent Iodine and Particulate Sampling During Accident Conditions EP RB-14 Core Damage Assessment Procedure EP RB-14A Initial Detection of Fuel Cladding Damage EP RB-15 Post Accident Sampling System EP RB-16 Operating Instructions for the EARS Computer Program	Radiation Protection & Assessment (Immediate Operator Response) EP RB-8 Instructions for Field Monitoring Teams EP RB-10 Protective Action Recommendations EP RB-12 Plant Vent Iodine and Particulate Sampling During Accident Conditions EP RB-14 Core Damage Assessment Procedure EP RB-14A Initial Detection of Fuel Cladding Damage EP RB-15 Post Accident Sampling System EP RB-16 Operating Instructions for the EARS Computer Program EP RB-17 Operation Instructions for QuickDose	Modified existing content. Removed EP RB-9 and EP RB-11. Added EP RB-17. QuickDose replaced manual hand calculations as a backup method of dose assessment. A new procedure for QuickDose (EP RB-17) was developed. This change updates Appendix A to reflect changes made in Section 6 of the E-Plan. **The change to replace manual hand calculations with QuickDose was evaluated under 50.54(q) effectiveness evaluation 2018-10, which concluded prior NRC approval was not required.**
2	Cross Reference of Procedures To NUREG-0654 Table H.8 RB-9, RB-11 I.2 R-2, RB-9, RB-11, RB-14, RB-14A, RB-	Cross Reference of Procedures To NUREG-0654 Table H.8 RB-17 I.2 R-2, RB-14, RB 14A, RB-15, RB-16,	Modified existing content. Replaced procedure references for EP RB-9 and EP RB-11 with EP RB-16 and EP RB-17 as applicable.

Change	Original Content (Rev 4.07)	Revised Content (Rev 4.08)	Reason for Change
	15, RB-16 I.3.a R-2, R-3, RB-9, RB-11, RB-16 I.3.b R-2, RB-9, RB-11, RB-16 I.4 RB-9, RB-11 I.5 R-2, RB-9, RB-11, RB-16 I.6 R-2, RB-9, RB-11, RB-16 I.10 RB-8, RB-9, RB-10, RB-11 M.4 RB-9, RB-11, OR-3	RB-17 I.3.a R-2, R-3, RB-16, RB-17 I.3.b R-2, RB-16, RB-17 I.4 RB-17 I.5 R-2, RB-16, RB-17 I.6 R-2, RB-16, RB-17 I.10 RB-8, RB-10, RB-16, RB-17 M.4 RB-16, RB-17, OR-3	QuickDose replaced manual hand calculations as a backup method of dose assessment. A new procedure for QuickDose (EP RB-17) was developed. This change updates Appendix A to reflect changes made in Section 6 of the E-Plan. **The change to replace manual hand calculations with QuickDose was evaluated under 50.54(q) effectiveness evaluation 2018-10, which concluded prior NRC approval was not required.**
3	Cross Reference of Procedures To NUREG-0654 Table N.3.a to f OM10.DC1, AWP EP-006	Cross Reference of Procedures To NUREG-0654 Table N.3.a to f OM10.DC1	Modified existing content. Removed AWP EP-006 from listing based on revision 9 to OM10.DC1 which relocated all drill program requirements from AWP EP-006 into OM10.DC1. **This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments.**