



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 23, 2019

Mr. James M. Welsch
Vice President, Nuclear Generation
and Chief Nuclear Officer
Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant
P.O. Box 56, Mail Code 104/6
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 - REGULATORY
AUDIT PLAN FOR AUDIT IN SUPPORT OF THE LICENSE AMENDMENT
REQUEST TO REVISE TECHNICAL SPECIFICATION FOR USE OF FULL
SPECTRUM LOSS-OF-COOLANT ACCIDENT METHODOLOGY
(EPID L-2018-LLA-0730)

Dear Mr. Welsch:

By letter dated December 26, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19003A196), Pacific Gas and Electric Company submitted a license amendment request for Diablo Canyon Nuclear Power Plant, Units 1 and 2 (DCPP) regarding revisions to Technical Specification 5.6.5b, "Core Operating Limits Report (COLR)." The requested change would replace the existing U.S. Nuclear Regulatory Commission (NRC)-approved loss-of-coolant accident (LOCA) methodologies with the NRC-approved LOCA methodology contained in Westinghouse Electric Company LLC's topical report WCAP-16996-P-A, Revision 1, "Realistic LOCA Evaluation Methodology Applied to the Full Spectrum of Break Sizes (FULL SPECTRUM LOCA Methodology)," dated November 2016 (ADAMS Accession Package No. ML17277A130), that was used for LOCA reanalysis for DCPP.

The NRC staff has identified the need for a regulatory audit to examine the licensee's non-docketed information with the intent to gain understanding, to verify information, or to identify information that will require docketing to support the basis of the licensing or regulatory decision. The enclosure to this letter provides an audit plan in support of this audit.

J. Welsch

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If you have any questions, please contact me at 301-415-3016 or via e-mail at Balwant.Singal@nrc.gov.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:
Regulatory Audit Plan

cc: Listserv

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MHamm, NRR/DSS/STSB

SMarshall, RES/DSA/CRAB

ADAMS Accession No.: ML19106A390

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL2-1/LAiT	NRR/DORL/LPL4/LA
NAME	BSingal	KZeleznock	PBlechman (JBurkhardt for)
DATE	4/17/19	4/17/19	4/17/19
OFFICE	NRR/DSS/SRXB/BC	NRR/DORL/LPL4/BC	NRR/DORL/LPL4/PM
NAME	JWhitman	RPascarelli	BSingal
DATE	4/18/19	4/23/19	4/23/19

OFFICIAL RECORD COPY

REGULATORY AUDIT PLAN
TO SUPPORT REVIEW OF THE LICENSE AMENDMENT REQUEST
TO REVISE TECHNICAL SPECIFICATION 5.6.5b
FOR USE OF FULL SPECTRUM LOSS-OF-COOLANT ACCIDENT METHODOLOGY
DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2
DOCKET NOS. 50-275 AND 50-323

1.0 BACKGROUND

By letter dated December 26, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession Package No. ML19003A196), Pacific Gas and Electric Company (the licensee) submitted a license amendment request for Diablo Canyon Nuclear Power Plant, Units 1 and 2 (DCPP) regarding revisions to Technical Specification 5.6.5b, "Core Operating Limits Report (COLR)." The requested change would replace the existing U.S. Nuclear Regulatory Commission (NRC)-approved loss-of-coolant accident (LOCA) methodologies with the NRC-approved LOCA methodology contained in Westinghouse Electric Company LLC's topical report WCAP-16996-P-A, Revision 1, "Realistic LOCA Evaluation Methodology Applied to the Full Spectrum of Break Sizes (FULL SPECTRUM LOCA Methodology)," dated November 2016 (ADAMS Accession Package No. ML17277A130), that was used for LOCA reanalysis for DCPP.

The NRC staff has determined the need for a regulatory audit to be conducted in accordance with the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195), for the NRC staff to examine the licensee's non-docketed information with the intent to gain understanding, to verify information, or to identify information that will require docketing to support the basis of the licensing or regulatory decision.

2.0 REGULATORY AUDIT BASIS

The NRC staff will perform the audit to support its evaluation of whether the licensee's request meets the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.90.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The NRC staff will review the licensee's calculations related to its FULL SPECTRUM LOCA (FSLOCA) Methodology to determine if the licensee needs to submit any additional information contained in the analyses performed in support of the requested change to support or develop conclusions for the staff's safety evaluation.

4.0 INFORMATION NECESSARY FOR THE REGULATORY AUDIT

The NRC staff requests the licensee to have the following information readily available and accessible for the staff's review via an internet-based portal:

- All calculations associated with the FSLOCA analysis used in support of this amendment request.

Based on the review of the documents provided, the NRC staff will determine whether it needs to request any additional documents to be made available on the portal or additional information needs to be submitted on docket for the staff to complete the review of the requested change.

5.0 TEAM ASSIGNMENTS AND LOGISTICS

The audit team will consist of the following NRR and Office of Nuclear Regulatory Research (RES) staff:

- Mr. Robert Beaton, Reactor Systems Branch, NRR (Technical Team Lead)
- Mr. Reed Anzalone, Reactor Systems Branch, NRR
- Mr. Ben Parks, Nuclear Performance and Code Review Branch, NRR
- Mr. Matthew Hamm, Technical Specifications Branch, NRR
- Mr. Shawn Marshall, Code and Reactor Analysis Branch, RES
- Mr. Balwant Singal, NRR (Project Manager)

If necessary, the NRC staff will conduct a teleconference with the licensee for the purposes of introducing the review team, discussing the scope of the audit, and describing the information to be made available on internet portal. The NRC staff will also confirm with the licensee if the information made available on the internet portal contains and sensitive or proprietary information.

The audit will occur intermittently via an internet-based portal at NRC Headquarters Office in Rockville, Maryland, from April 29, 2019, through July 12, 2019. The NRC staff requests the licensee to have the information discussed in Section 4.0 readily available and accessible for the staff's review via an internet-based portal by April 26, 2019. The NRC staff requests the licensee to have its staff available at mutually agreeable day and time by telephone to answer the NRC staff questions during the audit related to information provided on the portal. The NRC staff will not conduct formal entrance or exit meetings; however, the NRC's Project Manager will inform the licensee via routine communications when the staff no longer needs access to the portal information. The NRC staff does not foresee the need for an on-site visit or in-person discussions between the NRC and licensee staff to discuss information to be provided on portal at this time. However, if the need for a such a meeting is identified in the future, the audit plan will be revised and the schedule for the audit will be adjusted accordingly.

6.0 DELIVERABLES

After the audit, the NRC staff may develop a request for additional information, as needed. Any such request will be officially documented. The staff intends to issue an audit summary report by August 30, 2019.