



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

October 7, 2019

Mr. James M. Welsch
Senior Vice President, 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 –
CORRECTION TO ISSUANCE OF AMENDMENT NOS. 233 AND 235 TO
REVISE THE EMERGENCY PLAN TO CHANGE STAFFING AND EXTEND
STAFF AUGMENTATION TIMES FOR EMERGENCY RESPONSE
ORGANIZATION POSITIONS (EPID L-2018-LLA-0248)**

Dear Mr. Welsch:

By letter dated August 21, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19196A309), the U.S. Nuclear Regulatory Commission (NRC, the Commission) issued Amendment No. 233 to Facility Operating License No. DPR-80 and Amendment No. 235 to Facility Operating License No. DPR-82 for Diablo Canyon Nuclear Power Plant (Diablo Canyon), Units 1 and 2. The amendments revised the Diablo Canyon Emergency Plan (EP) to change the emergency response organization staffing composition and extend staff augmentation times from 60 to 90 minutes for certain emergency response organization positions from the time of declaration of an alert or higher emergency classification level.

After the issuance of the amendment, the NRC staff was notified by Pacific Gas and Electric Company (the licensee) that the definition of "Facility Activation" in Section 3.3.1 of the safety evaluation is in error. The licensee revised the definition provided in application dated September 12, 2018 (ADAMS Accession No. ML18255A368), by letter dated May 2, 2019 (ADAMS Accession No. ML19122A494). However, the safety evaluation issued by letter dated August 21, 2019, refers to the definition provided by letter dated September 12, 2018. Upon further review, the NRC staff determined that the staff's safety evaluation should have referenced the definition stated in the letter dated May 2, 2019.

The revised definition for "Facility Activation," in the letter dated May 2, 2019, states:

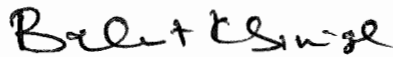
An Emergency Response Facility is activated when the minimum staff per [Diablo Canyon EP] Figures 5-2, 5-3 and 5-4 are available and the facility is ready to assume assigned functions. Although the facility may be ready, the on-shift staff may prioritize completion of critical tasks prior to turnover.

The NRC staff also determined that the error is administrative in nature. The corrections do not change any of the conclusions in the safety evaluation associated with the amendments and do not affect the associated notice to the public.

The enclosure to this letter contains corrected Safety Evaluation page 13. The revised page contains a marginal line indicating the area of change. Please replace the corresponding page issued by Amendment Nos. 233 and 235 for Diablo Canyon, Units 1 and 2, respectively.

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

Sincerely,



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

Enclosures:
Corrected Safety Evaluation Page 13

cc: Listserv

ENCLOSURE

CORRECTED SAFETY EVALUATION PAGES FOR

AMENDMENT NO. 233
PACIFIC GAS AND ELECTRIC COMPANY
DIABLO CANYON NUCLEAR POWER PLANT, UNIT 1
DOCKET NO. 50-275

AND

AMENDMENT NO. 235
PACIFIC GAS AND ELECTRIC COMPANY
DIABLO CANYON NUCLEAR POWER PLANT, UNIT 2
DOCKET NO. 50-323

Table 5-1A in the current Diablo Canyon EP provides that a Fire Department, consisting of five on-shift personnel, will perform the duties of the Firefighting Functional Area. This group also provides medical and rescue functions. The licensee provides that augmentation is provided by local fire support resources, which is clearly identified on the proposed Table 5-1.

The licensee is not proposing a change to the Firefighting Functional Area. Therefore, the proposed Diablo Canyon EP continues to meet the planning standard of 10 CFR 50.47(b)(2) and the requirements in Section IV.A of Appendix E to 10 CFR Part 50.

3.2.8 Major Functional Area: Rescue Operations and First-Aid

The guidance in NUREG-0654 specifies the Rescue Operations and First-Aid Major Functional Area to be fulfilled by two personnel on-shift that may be assigned other functions. Additionally, the guidance in NUREG-0654 identifies augmentation by local support within 30 minutes.

Table 5-1A in the current Diablo Canyon EP provides a note stating that the First Aid and Rescue Operations Major Tasks “[m]ay be performed by someone filling another position having functional qualifications.” The licensee provides that the Fire Department, consisting of five on shift personnel, will provide medical and rescue functions as an ancillary duty.

The number of personnel to perform the Rescue Operations and First-Aid Major Functional Area remains unchanged from the current Diablo Canyon EP and continues to meet the guidance provided in NUREG-0654. Therefore, the proposed Diablo Canyon EP continues to meet the planning standard of 10 CFR 50.47(b)(2) and the requirements in Section IV.A of Appendix E to 10 CFR Part 50.

3.2.9 Major Functional Area: Site Access Control and Personnel Accountability

The licensee proposed to remove the Diablo Canyon Watch Commander from Table 5-1A of the current Diablo Canyon EP. The licensee states that responsibility to perform onsite emergency assembly and accountability as described in the Diablo Canyon EP will continue to be performed by Security personnel under the site’s Security Plan. The proposed change does not alter the ability or timing to perform site access control and personnel accountability from that outlined in the current Diablo Canyon EP and continues to meet the guidance provided in NUREG-0654. Therefore, the proposed Diablo Canyon EP continues to meet the planning standards of 10 CFR 50.47(b)(2) and the requirements in Section IV.A of Appendix E to 10 CFR Part 50.

3.3 Changes Not Directly Related to NUREG-0654 Major Functional Areas

3.3.1 Defining Facility Activation

The licensee proposes to define “facility activation” as follows:

An Emergency Response Facility is activated when the minimum staff per [Diablo Canyon EP] Figures 5-2, 5-3 and 5-4 are available and the facility is ready to assume assigned functions. Although the facility may be ready, the on-shift staff may prioritize completion of critical tasks prior to turnover.

By using the Major Functional Areas as identified in NUREG-0654, the proposed change defines activation criteria to clearly identify the positions which must be filled so that transfer of the command and control functions can be completed and on-shift personnel can be relieved of

SUBJECT: DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 –
CORRECTION TO ISSUANCE OF AMENDMENT NOS. 233 AND 235 TO
REVISE THE EMERGENCY PLAN TO CHANGE STAFFING AND EXTEND
STAFF AUGMENTATION TIMES FOR EMERGENCY RESPONSE
ORGANIZATION POSITIONS (EPID L-2018-LLA-0248)
DATED OCTOBER 7, 2019

DISTRIBUTION:

PUBLIC
PM File Copy
RidsACRS_MailCTR Resource
RidsNrrDorlLpl4 Resource
RidsNrrLAPBlechman Resource
RidsNrrPMDiabloCanyon Resource
RidsRgn4MailCenter Resource
RidsNsrDpr Resource
RHoffman, NSIR

ADAMS Accession No. ML19274B082

*Via E-mail

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA	NSIR/DPR/RLB/BC*
NAME	BSingal	PBlechman	JAnderson (AMarshall for)
DATE	10/03/19	10/03/19	10/04/19
OFFICE	NRR/DORL/LPL4/BC	NRR/DORL/LPL4/PM	
NAME	RPascarelli	BSingal	
DATE	10/07/19	10/07/19	

OFFICIAL RECORD COPY