



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 45 TO FACILITY OPERATING LICENSE NO. DPR-80
AND AMENDMENT NO. 44 TO FACILITY OPERATING LICENSE NO. DPR-82
PACIFIC GAS AND ELECTRIC COMPANY
DIABLO CANYON NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NO. 50-275 AND 50-323

1.0 INTRODUCTION

By letter dated August 15, 1989 (Reference LAR 89-10), Pacific Gas and Electric Company (PG&E or the licensee) requested amendments to the combined Technical Specifications (TS) appended to Facility Operating License Nos. DPR-80 and DPR-82 for the Diablo Canyon Power Plant (DCPP), Unit Nos. 1 and 2, respectively. The amendments change the TS specifying certain cycle-specific parameter limits by replacing the values of those limits with a reference to the Core Operating Limits Report (COLR) for the values of those limits. The amendments also include the addition of the COLR to the Definitions section of the TS, and to the reporting requirements of the Administrative Controls section of the TS. Guidance on the proposed changes was developed by NRC on the basis of the review of a lead-plant proposal submitted for the Oconee plant (Docket numbers 50-269, 50-270, and 50-287) by Duke Power Company. This guidance was provided to all power reactor licensees and applicants by Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications," dated October 4, 1988.

2.0 EVALUATION

The licensee's proposed changes to the TS are in accordance with the guidance provided by Generic Letter 88-16 and are addressed below.

- (1) The Definition section of the TS was modified to include a definition of the Core Operating Limits Report that requires cycle/reload-specific parameter limits to be established on a unit-specific basis in accordance with an NRC approved methodology that maintains the limits of the safety analysis. The definition notes that plant operation within these limits is addressed by individual specifications.
- (2) The following specifications were revised to replace the values of cycle-specific parameter limits with a reference to the COLR that provides these limits.

- (a) Specification 3.1.3.5 and 4.1.3.5
The Shutdown Rod Insertion Limit for these Specifications is specified in the COLR.
 - (b) Specification 3.1.3.6
The Control Rod Insertion Limits for this Specification are specified in the COLR. Figures 3.1-1a and 3.1-1b are deleted from the TS.
 - (c) Specification 3.2.1
The Axial Flux Difference Limits for this Specification are specified in the COLR. Figures 3.2-1a and 3.2-1b are deleted from the TS.
 - (d) Surveillance Requirements 4.2.2.1.2.c, 4.2.2.1.2.f, and 4.2.2.2.2.e
These Surveillance Requirements now reference the COLR rather than a Peaking Factor Limit Report. This is acceptable because it meets the intent of Generic Letter 88-16.
 - (e) The bases of affected specifications have been modified by the licensee to include appropriate reference to the COLR. Based on our review, we conclude that the changes to these bases are acceptable.
- (3) Specification 6.9.1.8 was added to the reporting requirements of the Administrative Controls section of the TS. This specification requires that the COLR be submitted, upon issuance, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector. The report provides the values of cycle-specific parameter limits that are applicable for the current fuel cycle. Furthermore, these specifications require that the values of these limits be established using NRC approved methodologies and be consistent with all applicable limits of the safety analysis. The approved methodologies are the following:
- (a) WCAP-10216-P-A, "Relaxation of Constant Axial Offset Control - F_Q Surveillance Technical Specification," June 1983 (Westinghouse proprietary).
 - (b) WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse proprietary).

- (c) WCAP-8385, "Power Distribution Control and Load Following Procedures," September 1974 (Westinghouse proprietary).

Finally, TS 6.9.1.8 requires that all changes in cycle-specific parameter limits be documented in the COLR before each reload cycle or remaining part of a reload cycle and submitted upon issuance to NRC, prior to operation with the new parameter limits.

On the basis of the review of the above items, the NRC staff concludes that the licensee provided an acceptable response to those items as addressed in the NRC guidance in Generic Letter 88-16 for modifying cycle-specific parameter limits in technical specifications. Because plant operation continues to be limited in accordance with the values of cycle-specific parameter limits that are established using NRC approved methodologies, the NRC staff concludes that this change is administrative in nature and there is no impact on plant safety as a consequence. Accordingly, the staff finds that the proposed changes are acceptable.

As part of the implementation of Generic Letter 88-16, the staff has also reviewed a sample COLR that was provided by the licensee. On the basis of this review, the staff concludes that the format and content of the sample COLR are acceptable. The licensee will use this format and scope of contents in the final COLRs for both units, which will be submitted to the staff prior to startup of Unit 1 from the third refueling outage.

In summary, the NRC staff has reviewed the request by the Pacific Gas and Electric Company to modify the combined Technical Specifications for Diablo Canyon Units 1 and 2 that would remove the specific values of three cycle-dependent parameters from the specifications and place the values in a Core Operating Limits Report that would be referenced by the specification. Based on this review, we conclude that these Technical Specification modifications are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. At Diablo Canyon, the restricted area is coincident with the site boundary. We have determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. In addition, these amendments involve changes in administrative requirements.

Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and (3) the issuance of these amendments will not be inimical to the common defense and security or the health and safety of the public.

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Dated: October 20, 1989