



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 43 TO FACILITY OPERATING LICENSE NO. DPR-80
AND AMENDMENT NO. 42 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 March 20, 1989 (Reference LAR 89-02), as supplemented by letter dated June 29, 1989, 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 as proposed would have changed TS Section 6.0, "Administrative Controls," regarding the General Office Nuclear Plant Review and Audit Committee (GONPRAC) membership, operating personnel working hours and limits, the plant staff qualifications and training program, and routine and special reports.

The NRC staff has reviewed the proposed changes and finds acceptable the changes that are applicable to the GONPRAC, and to routine and special reports. The other proposed changes are unacceptable and are hereby denied. The bases for the staff's findings for each proposed change are given below.

The submittal dated June 29, 1989 withdrew the previously proposed change in the title of one of the GONPRAC members. This change does not significantly alter the action noticed or affect the initial determination.

2.0 EVALUATION

The NRC staff has reviewed the TS changes proposed by the licensee and finds some of them acceptable, and some of them unacceptable, based on the following evaluation:

A. Section 6.2.2 - Organization

PG&E proposed two changes to TS Section 6.2.2.f regarding the administrative procedures that limit working hours. The licensee

proposed to revise the statement that "The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating." This would be changed to "The objective shall be to have operating personnel work a nominal 40-hour week while the unit is operating." The licensee also proposed to change the statement that "An individual should not be permitted to work... more than 24 hours in any 48-hour period..." This would be changed to "an individual should not be permitted to work...more than 28 hours in any 48-hours period..."

These changes were proposed to allow the use of a 12 hour shift rotation. We find the change to a nominal 40-hour week acceptable because it is consistent with past approvals on this subject, and will, by itself, allow the licensee to use a 12 hour shift rotation. We find the requested change to allow working 28 hours in a 48 hour period not acceptable, on the basis that the Commission Policy Statement on Nuclear Power Plant Staff Working Hours (46 FR 23836) states that an individual should not be permitted to work more than 24 hours in any 48 hour period. Accordingly, the latter change is hereby denied.

E. Section 6.3 - Plant Staff Qualifications

In this section, three changes were proposed. (1) PG&E proposed that the requirement in TS Section 6.3 that each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 be changed to ANSI/ANS 3.1-1978. (2) PG&E proposed that the requirement that the Radiation Protection Manager meet or exceed the qualifications recommended by Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," September 1975 be changed to reference Regulatory Guide 1.8, Revision 2, April 1987. (3) PG&E proposed to delete the statement that "The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980, NRC letter to all licensees." PG&E proposed to replace this with the statement that "The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of 10 CFR Part 55."

We find the first two changes acceptable on the basis that they meet current staff requirements. We find the last change partially unacceptable, because 10 CFR Part 55 does not specify the qualifications for eligibility for taking an Operator or Senior Operator examination, which the existing TS covers by referencing Section A of Enclosure 1 of the March 28, 1980 letter. On the other hand, Part 55 does address operator requalification, thereby superseding Section C of Enclosure 1 to the March 28, 1980 letter. On this basis, we find acceptable the substitution of 10 CFR Part 55 for Section C of Enclosure 1 to the March 28, 1980 NRC letter. On the same basis, we find unacceptable and hereby deny the proposed deletion from the TS of the requirement to meet Section A of Enclosure 1 to the March 28, 1980 NRC letter.

C. Section 6.4 - Training

PG&E proposed to change the statement in TS Section 6.4 that "A retraining and replacement training program for the plant staff ...shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980, NRC letter to all licensees, and include familiarization with relevant industry operational experience." The licensee proposed to replace this with the statement that "A retraining and replacement training program for the plant staff...shall meet or exceed the requirements of 10 CFR Part 55.

We find this proposed change acceptable except for the deletion of Section 5.5 of ANSI N18.1-1971. The reference to 10 CFR Part 55 is acceptable to the extent it covers the training of licensed operators. The deletion of the reference to Section 5.5 of ANSI N18.1-1971, is unacceptable, because that section applies to the entire plant staff, while 10 CFR Part 55 applies only to the retraining of licensed operators. On this basis, the deletion of reference to Section 5.5 of ANSI N18.1-1971 is hereby denied.

D. Section 6.5.3.2 - General Office Nuclear Plant Review and Audit Committee (GONPRAC) - Composition

PG&E requested that the Plant Manager, Diablo Canyon Power Plant be added as a member of the GONPRAC committee. In its March 20, 1989 submittal, PG&E requested that the title of committee member Manger, Station Construction be changed to Manager, Station and Hydro Construction. By letter dated June 29, 1989, PG&E withdrew the request for the change in committee member title. Therefore, the committee member title change is not included in these amendments.

We find the addition of the Plant Manager to the GONPRAC to be acceptable on the basis that it conforms to the Standard Technical Specifications.

E. Section 6.9 - Reporting Requirements

PG&E proposed that references to the NRC Office to which reports shall be submitted in TS Sections 6.9.1, 6.9.1.7, 6.9.1.8, and 6.9.2 be revised to state that reports will be submitted in accordance with 10 CFR 50.4.

We find these proposed changes acceptable because they they meet the Commission's regulations, specifically, 10 CFR 50.4.

Based on the above, the NRC staff finds acceptable the proposed revisions to TS Section 6.0, "Administrative Controls," that involve changes in the General Office Nuclear Plant Review and Audit Committee (GONPRAC) membership, and in routine and special reports. The other proposed changes, relating to operating personnel working hours and limits, and the plant staff qualifications and training program, are unacceptable and are hereby denied.

3.0 ENVIRONMENTAL CONSIDERATION

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)(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

The NRC staff has 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: July 19, 1969