

# N CLEAR REGULATORY COMMISSION

WASHINGTON D.C. 20555-0001

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. DPR-80 AND AMENDMENT NO. 90 TO FACILITY OPERATING LICENSE NO. DPR-82 PACIFIC GAS AND ELECTRIC COMPANY DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-275 AND 50-323

## 1.0 INTRODUCTION

By latter of September 8, 1993, Pacific Gas and Electric Company (or the licensee) submitted a request for changes to the Technical Specifications (TS). The proposed amendments would revise TS 1.44, "Radiological Monitoring and Controls Program," 3/4.11, "Radioactive Effluents," and 6.14, "Radiological Monitoring and Controls Program (RMCP), Offsite Dose Calculation Procedure (ODCP) and Environmental Radiological Monitoring Procedure (ERMP)," to change the Semiannual Radioactive Effluent Release Report to Annual Radioactive Effluent Release Report.

The proposed amendments would also revise TS 6.2.3, "Onsite Safety Review Group (OSRG)," 6.5.2, "Plant Staff Review Committee," and 6.5.3.7, "Nuclear Safety Oversight Committee Review," to implement organizational and functional changes.

### 2.0 EVALUATION

Following is a brief description and our evaluation of the requested changes.

a. TS Section 6.2.3 - Onsite Safety Review Group (OSRG) - PG&E proposes to delete this group and transfer the OSRG function to the new Nuclear Quality Services (NQS) department. The change will delete the requirement to maintain an onsite, five-person OSRG organization that is dedicated to performing independent technical reviews. The NQS department also includes the PG&E Quality Assurance (QA), Quality Control (QC), and other nuclear safety engineering functions. The Manager, NQS, reports to the Senior Vice President and General Manager, Nuclear Power Generation. The revised requirements will be incorporated into a new Section 6.5.4. See item d. below.

The staff finds these changes acceptable as the function of the OSRG is maintained and it is consistent with the Improved Standard Technical Specifications (ISTS).

b. TS Section 6.5.2.2 - Plant Staff Review Committee (PSRC) Composition - PG&E proposes to delete the word "plant" from the phrase "senior management individuals" since a member of the committee, the Director QC, will report offsite to the Manager, NQS.

The staff finds this change acceptable as it does not reduce the qualification requirements for PSRC members.

c. TS Section 6.5.3.7 - Nuclear Safety Oversight Committee (NSOC) Review -PG&E proposes to delete the review of OSRG reports and meeting minutes and add the review of reports of the Independent Technical Review Program.

The staff finds this change acceptable as it reflects the revised organizational provisions for the review of the Independent Technical Review Program activities.

d. TS Section 6.5.4 - Independent Technical Review Responsibilities - PG&E proposes to add this new section to the TS. This section describes the Independent Technical Review Responsibilities (see item a. above). The description includes the review responsibilities, record keeping, and qualifications requirements for individuals performing these reviews.

The staff finds this requirement acceptable as it retains the functions of the OSRG and conforms to the general characteristic description of this function in the ISTS. The staff finds the commitment to utilizing "sufficient" onsite personnel unacceptable. PG&E has agreed to change this wording to "several" onsite personnel to meet the requirement of NUREG 0737, Item 1.B.1.2 and to be consistent with the ISTS. The staff finds this acceptable.

Also, PG&E inadvertently failed to change references to the Semiannual Radioactive Effluent Release Report contained in TS 1.44, 3.11.1.4, 3.11.2.6 and 6.14.2 when LAR 92-10 (PG&E Letter No. DCL-92-283, dated December 22, 1992) was submitted to the NRC. License Amendments 77 and 78 changed the frequency of the Radioactive Effluent Release Report from semiannual to annual. This change is administrative in nature, but serves to clarify the TS to avoid any confusion.

Based on the above discussion, the staff finds the proposed TS amendment acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendments. The State official had no commerts.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets 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 the amendment.

### 5.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: F. Allenspach

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