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

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'84 JAN -5 P4:08

January 5, 1984

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SUBJECT: PACIFIC GAS AND ELECTRIC COMPANY (DIABLO CANYON NUCLEAR POWER
PLANT, UNIT 1), DOCKET NO. 50-275, OL-DPR-76

Counsel:

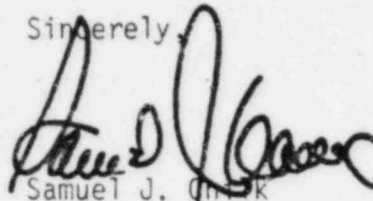
By letter dated January 4, 1984, Pacific Gas and Electric Company (PG&E) requests authority to proceed to operational modes 3 and 4, precriticality hot system testing, at Diablo Canyon Nuclear Power Plant, Unit 1. By memorandum of the same date, the NRC staff recommends that the Commission grant the request and reinstate PG&E's authority to operate at modes 3 and 4. The staff notes, in particular, that no fission product inventory will be produced during modes 3 and 4.

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You are hereby invited to submit in writing your comments, if any, regarding PG&E's request for further reinstatement of precriticality testing authority. To ensure consideration, your comments must be received by Monday, January 16, 1984.

Sincerely,



Samuel J. Chiswick
Secretary of the Commission

Enclosures:

1. SECY-84-1 (January 4, 1984)
2. Letter, PG&E (Maneatis) to Commission dated January 4, 1984

cc: Lawrence J. Chandler
David S. Fleischaker
Arthur C. Gehr
Joseph B. Knotts, Jr.
Bruce Norton
Richard F. Locke
Maurice Axelrad



POLICY ISSUE **(Notation Vote)**

January 4, 1984

SECY-84-1

For: The Commissioners

From: William J. Dircks
Executive Director for Operations

Subject: MODIFICATION OF COMMISSION MEMORANDUM AND ORDER REGARDING
OPERATION OF DIABLO CANYON NUCLEAR POWER PLANT (CLI-83-27)

Purpose: To provide the Commissioners with the staff's recommendation to reinstate the authority to engage in activities in Modes 4 and 3 under Facility Operating License No. DPR-76 prior to consideration of criticality and low power testing, pursuant to licensee's request of January 4, 1984.

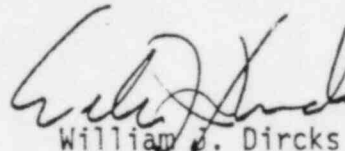
Discussion: At the October 28 Commission meeting, both the staff and PG&E recommended reinstatement of the authority to load fuel and conduct precriticality testing in terms of operation in Modes 6 and 5. This authority had been requested by PG&E in December 1982 as part of its proposed 3-step process for reinstatement of the Unit 1 operating license and authorization of full power operation, which was approved by the Commission. The limitation on the modes of operation was placed on PG&E's request because of their modification completion schedule. Collectively, however, Modes 6, 5, 4, and 3 encompass operation within what was contemplated by Step 1 in the 3-step licensing process, i.e. precritical activities. On November 8, 1983, the Commission issued a Memorandum and Order, CLI-83-27, in which, among other things, it reinstated the authority to load fuel and conduct pre-criticality activities included within Modes 6 and 5 as described in the Diablo Canyon Technical Specifications.

Consistent with the Commission's Memorandum and Order, the licensee has loaded fuel and has been conducting activities permitted under Modes 6 and 5 which limit system heatup to 140°F. We have been advised by the licensee, by letter dated January 4, 1984, that all steps necessary to undertake activities under Modes 4 and 3 will be completed so as to permit entry into Mode 4 by January 15, 1984. From an operational standpoint, the licensee has estimated that Mode 4 and 3 operation will take about two weeks to complete. Operation in Modes 4 and 3 would allow additional precriticality

activities to be conducted at full system temperatures and pressures. As noted by the Staff in SSER 21, December 1983, such operation will provide additional confidence in the evaluation of piping and pipe support design which will be helpful in the staff's assessment of a number of allegations still under review.

The staff continues to be satisfied overall that the public health and safety is protected during operation in these modes given the low risk attributable to precriticality activities and the fact that no fission product inventory will be created. In addition, the staff, in SSER 20, December 1983, has completed its review of those matters which require resolution prior to step 2 (criticality and low power testing) and, subject to the reservation noted in SSER 21) has favorably reported on them. We further believe that authorization to proceed to Modes 4 and 3 would be consistent with the Commission's intentions as evidenced in its November 8, 1983 Memorandum and Order which, but for a single reference to Modes 6 and 5, reinstated the authority to load fuel and conduct precriticality activities.

Recommendation: The staff recommends that the Commission grant the licensee's request of January 4, 1984 and modify its Memorandum and Order to permit operation in Mode 4 and 3.



William J. Dircks
Executive Director for Operations

Enclosure:
Proposed Commission Order (to follow)

Commissioners' comments or consent should be provided directly to the Office of the Secretary by c.o.b. Friday, January 13, 1984.

Commission Staff Office comments, if any, should be submitted to the Commissioners NLT Tuesday, January 10, 1984, with an information copy to the Office of the Secretary. If the paper is of such a nature that it requires additional time for analytical review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

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GEORGE A. MANEATIS
EXECUTIVE VICE PRESIDENT

'84 JAN -5 AIO:27

January 4, 1984

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PGandE Letter No.: DCL-84-002

Chairman Nunzio J. Palladino
U. S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Commissioner James K. Asselstine
Commissioner Frederick M. Bernthal
Commissioner Victor Gilinsky
Commissioner Thomas M. Roberts

Re: Docket No. 50-275, DL-DPR-76
Diablo Canyon Unit 1
Request to Perform Precriticality Hot System Testing,
Achieve Criticality and Conduct Low Power Testing

Dear Mr. Chairman and Commissioners:

On November 8, 1983, the NRC issued Commission Order CLI-83-27 which authorized PGandE to conduct fuel loading and precriticality testing activities (Step 1) at Diablo Canyon Power Plant (DCPP). The Order specifically authorized activities to be performed in accordance with the Technical Specification (Appendix A to Operating License DPR-76) requirements for Modes 6 (fuel loading) and 5 (cold system testing). At this time, PGandE has completed fuel loading and cold system testing activities. PGandE anticipates readiness to conduct activities related to Modes 4 and 3 (precriticality hot system testing) by January 15, 1984.

In order to prevent unnecessary delays in the schedule for commercial operation, PGandE requests authorization to conduct precriticality testing activities involving reactor coolant system heatup and hot systems testing at DCPP. Operations and precriticality testing would be conducted in accordance with the Technical Specification requirements for Modes 4 and 3.

Operation in Modes 4 and 3 will permit a detailed inspection of the plant to be conducted at elevated temperatures prior to criticality. This will include the checking of thermal expansion of the piping and equipment and reviewing the various supports, anchors, snubbers, and whip restraints associated with the piping at elevated temperatures.

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Chairman Nunzio J. Palladino
January 4, 1984
Page Two

PGandE will also be able to complete the planned setting of thermal gaps, restraint clearances and other work that must be finally adjusted for the thermal conditions of the plant. Operation in Modes 4 and 3 will also permit proceeding with additional testing before generating any radioactivity.

If reactor coolant system heatup begins on January 15, PGandE expects the completion of tests in Modes 4 and 3 by January 31. In accordance with this schedule, PGandE will be ready for initial criticality and low power testing on February 1, 1984. PGandE, therefore, also requests authorization to achieve criticality and low power testing on or before February 1, 1984, pursuant to Step 2 of the three-step licensing process.

If initial criticality and low power testing commence on February 1, 1984, PGandE expects to be ready for power ascension on March 3, 1984.

A timely decision in this matter would be greatly appreciated.

Sincerely,

George A. Manetti

cc: D. G. Eisenhower
G. W. Knighton
H. E. Schierling
Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
PACIFIC GAS AND ELECTRIC COMPANY)
)
Diablo Canyon Nuclear Power Plant,)
Units 1 and 2)
_____)

Docket No. 50-275
Docket No. 50-323 A10 :27

OFFICE OF THE
DOCKET CLERK
BRANCH

CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company has (have) been served today on the following by deposit in the United States mail, properly stamped and addressed:

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Washington DC 20555

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Washington DC 20555

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US Nuclear Regulatory Commission
Washington DC 20555

Chairman
Atomic Safety and Licensing
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US Nuclear Regulatory Commission
Washington, D.C. 20555

Secretary
US Nuclear Regulatory Commission
Washington, D.C. 20555

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Washington, D.C. 20555

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Judge John H. Buck
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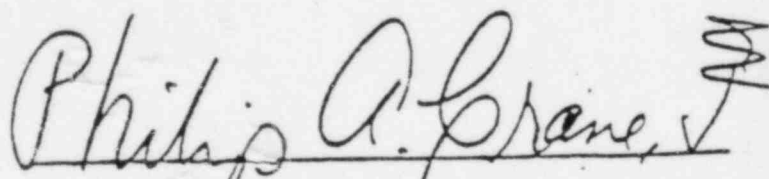
Commissioner James K. Asselstine*
US Nuclear Regulatory Commission
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Washington, D.C. 20555

* Has received copy by courier

Note: Courier copy also to

DG Eisenhut
GW Knighton
HE Schierling

Date: May 31, 1983


Philip A. Grane
Pacific Gas and Electric Company