



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NO. DPR-80
AND AMENDMENT NO. 68 TO FACILITY OPERATING LICENSE NO. DPR-82
PACIFIC GAS AND ELECTRIC COMPANY
DIABLO CANYON NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-275 AND 50-323

1.0 INTRODUCTION

By letter dated March 18, 1991, as supplemented by letters dated May 3 and November 22, 1991, Pacific Gas and Electric Company (PG&E or the licensee) requested amendments to Facility Operating License Nos. DPR-80 and DPR-82 for Diablo Canyon Units 1 and 2, respectively. The amendment application is designated License Amendment Request LAR 91-01. The amendments change the combined Diablo Canyon technical specifications (TS) to delete the requirement to verify that the containment fan cooler unit (CFCU) dampers transfer from the normal to the accident position. Specifically, Surveillance Requirement 4.6.2.3.a.(3) of TS 3/4.6.2.3, "Containment Cooling System," will be modified to delete the requirement to verify that the containment fan cooler unit (CFCU) dampers transfer to the accident position. The requirement to verify damper position will not be necessary after a planned CFCU modification is made because the dampers will then be secured in the accident position. The CFCU modification will be made during the 5th refueling outage for each unit. Therefore, the revised TS 4.6.3.2.a.(3) is cycle dependent, and verification of CFCU damper position will not be required starting with Cycle 6.

2.0 EVALUATION

The containment fan cooler system at Diablo Canyon consists of five containment fan cooler units (CFCUs), each including moisture separators, high efficiency particulate air (HEPA) filters, cooling coils, direct drive fans, normal and accident air flow dampers, backdraft and pressure relief dampers, distribution ductwork and the associated controls. During normal operation, air is drawn through the CFCU cooling coils and is discharged through the ductwork to the containment atmosphere. During post-accident operation, the normally-open dampers are closed and the post-accident dampers are opened. These changes in damper position add the moisture separators and HEPA filters to the flow path. To assure operability of the system, TS 4.6.2.3 requires periodic verification that each CFCU starts in its low speed (accident) mode and that the dampers transfer to the accident position.

The licensee plans to simplify the system by permanently securing the CFCU normal-mode and accident-mode dampers in positions such that both the normal and accident-mode functions can be performed without changing the damper positions. After the change, the unit air flow rates will be in accordance with design air flow rates for both normal and accident modes of operation. This design change will make it unnecessary to verify that the dampers transfer to the accident position.

The design simplification is based on a safety analysis that did not take any credit for the containment air cleaning function of the accident flow path, i.e., no credit was taken for charcoal or HEPA filters. This analysis showed that with sprays alone and without particulate retention, the postulated post-accident conditions satisfy the dose requirements of 10 CFR Part 100.

The HEPA filters and moisture separators were originally installed as a radioiodine removal system during the postulated post-accident conditions to support the existing analysis. Subsequently, a revised analysis showed that the containment spray alone with no additional cleanup system was sufficient. The HEPA filters and moisture separators had already been installed when the revised analytical results became known, but the charcoal filters had not yet been installed. Based on the results of the revised analysis, the licensee decided not to install charcoal filters.

Although the revised analysis showed that the HEPA filters and moisture separators were not needed, they have been maintained in an operating condition since plant startup. The safety analysis upon which the above conclusion is based has been documented by the licensee in Chapter 15 of the Updated FSAR.

Based on this analysis, the licensee concludes that there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed CFCU simplification and TS changes. The staff concurs with this conclusion.

In summary, the Staff has reviewed the licensee's request and concludes that the proposed changes will maintain adequate safety margins and therefore will not significantly affect the public health and safety. On the basis of its review of this matter as described above, the NRC staff finds that the proposed changes to the Diablo Canyon TS are acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The staff has 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 (56 FR 24214) a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

5.0 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, (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 to the health and safety of the public.

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Dated: April 17, 1992