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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 70 TO FACILITY OPERATING LICENSE NO. DPR-80

AND AMENDMENT NO. 69 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 June 5, 1991, Pacific Gas and Electric Company (PG&E or the licensee) requested amendments to Facility Operating Licenses DPR-80 and DPR-82 for Diablo Canyon Units 1 and 2, respectively. The amendment application is designated License Amendment Request LAR 91-06. The amendments chang the combined Diablo Canyon technical specifications (TS) to support completion of planned upgrades to the Radiation Monitoring System (RMS) at these units. The specific technical specifications to be changed are:

1. TS 3/4.3.2, "Engineered Safety Features Activation System Instrumentation" and the referenced Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2.

2. TS 3/4.3.3.1, "Radiation Monitoring for Plant Operations" and the referenced Tables 3.3-6 and 4.3-3.

3. TS 3/4.3.3.10, "Radioactive Gaseous Effluent Monitoring Instrumentation" and the referenced Tables 3.3-13 and 4.3-9.

4. TS 3/4.9.9, "Containment Ventilation Isolation System."

5. Bases 3/4.9.12, "Fuel Handling Building Ventilation System."

In the June 5, 1991, submittal, the licensee noted that the RMS upgrade and the associated TS changes were not intended to address an immediate safety concern. Rather, the changes are being made to reduce spurious containment ventilation isolation events, fuel handling building ventilation shifts, and the associated Licensee Event Reports (LERs).

## 2.0 EVALUATION

Pacific Gas and Electric Company has proposed changes to the technical specifications for Diablo Canyon Units 1 and 2. The changes proposed by the licensee are discussed below according to the sections of the technical specification affected by the requested modifications.

(1) Plant Vent and Containment Ventilation System Monitors

The licensee has proposed changes to TS 3/4.3.2 "Engineered Safety Features Actuation System Instrumentation." Changes to TS Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2 will add operability, response time, and surveillance requirements for the radiation monitors RM-44A and RM-44B. Outputs from RM-14A and RM-14B will be removed as inputs to the Solid State Protection Systems (SSPS) Containment Ventilation Isolation (CVI) actuation logic and will be replaced with outputs from RM-44A and RM-44B. TS Table 3.3-6, "Radiation Monitoring Instrumentation for Plant Operations," and Table 4.3-3, "Radiation Monitoring Instrumentation for Plant Operations Surveillance Requirements," will provide appropriate operability and surveillance requirements for RM-44A and RM-44B. The addition of RM-44A and RM-44B will enhance radiation monitoring system response to radioactivity located in the containment ventilation exhaust since the RM-44A and RM-44B detectors will be located closer to the containment ventilation exhaust penetration and, therefore, closer to any release originating within the containment. In addition, RM-44A and RM-44B will be placed directly in the effluent stream and will monitor undiluted containment exhaust.

In addition, plant vent monitors RM-14A and RM-14B will be replaced with new noble gas activity monitors RM-14 and RM-14R. These monitors will incorporate improvements in sensitivity, range, and dependability compared to RM-14A and RM-14B. In its June 5, 1991, amendment request, the licensee proposed to add operability and surveillance requirements for the new noble gas monitors in TS Table 3.3-13, "Radioactive Gaseous Effluent Monitoring Instrumentation," and Table 4.3-9, "Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements." However, these tables were removed from the TS by Amendments 67 and 66 to the Diablo Canyon operating licenses, issued on January 22, 1992. At that time the tables were relocated to the Radiological Monitoring Control Procedure (RMCP) or the Process Control Program (PCP), as appropriate. Therefore, this amendment does not revise these tables. Rather, the licensee has indicated that appropriate changes will be made to the RMCP and/or the PCP. A new plant vent flow rate monitor will increase the capability to analyze the radiochemical contents of the vent effluent.

Applicable design features of monitors RM-44A and RM-44B as well as RM-14 and RM-14R are in accordance with applicable criteria of Standard Review Plan (SRP) Section 11.5 "Process and Effluent Monitoring Instrumentation and Sampling System."

The NRC staff has reviewed the TS changes proposed by the licensee related to the plant vent and containment ventilation system monitors and finds that the changes proposed by the licensee for these monitors provide an adequate level on accountability and control of effluents discharged via these pathways. Consequently, we find these proposed changes acceptable.

(2) Fuel Handling Building (FHB) Monitors

Radiation monitoring in the fuel storage areas and instrumentation to provide input to the FHB ventilation mode-shift actuation logic will be provided by the additions of RM-45A and RM-45B to the FHB ventilation exhaust line. These inputs will replace the existing RM-58 and RM-59 inputs to the FHB ventilation mode shift actuation logic. These monitors will directly monitor the Spent Fuel Pool (SFP) exhaust streams, a capability which has not previously existed at Diablo Canyon. Appropriate technical specification operability and surveillance requirements for these monitors will be included in TS Table 3.3-6 and Table 4.3-3.

The NRC staff has reviewed the technical specification changes proposed by the licensee related to the radiation monitors associated with the FHB ventilation mode shift actuation logic and finds that the changes proposed provide for improved monitoring of the Spent Fuel Pool exhaust streams since direct monitoring of this flow stream will be provided by the modified system. Consequently, we find the changes proposed by the licensee acceptable.

In summary, the staff finds that the changes to the Diablo Canyon radiation monitoring systems proposed by Pacific Gas and Electric Company in its June 5, 1991, application will provide an improved level of accountability of effluents discharged to the environment. In addition, the changes to the technical specifications proposed by the licensee are suitable for use with the modified system. On the basis of its review of this matter, 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 a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 37588). 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 Commission 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 20, 1992