

From: Lee, Samson
Sent: Wednesday, July 7, 2021 5:07 PM
To: Richardson, Michael
Subject: Additional DRAFT request for additional information - Diablo Canyon emergency amendment request to revise Technical Specification 3.7.8, "Auxiliary Saltwater (ASW) System" (EPID L-2021-LLA-0123)

Michael,

Below is an additional DRAFT request for additional information (RAI) for the Diablo Canyon emergency license amendment request for the Auxiliary Saltwater (ASW) System. Please let me know if you need a clarification call. We expect an RAI response soon today.

Thanks,
Sam

Background:

By letter dated July 7, 2021, Pacific Gas and Electric Company (PG&E or the licensee) submitted an emergency license amendment request (LAR) to revise the Technical Specification (TS) for the Diablo Canyon Nuclear Power Plant, Units 1 (Diablo Canyon or DCCP) (ADAMS Accession No. ML21188A214). The proposed amendments would provide a new TS 3.7.8 Condition A note to allow a one-time Completion Time (CT) of 144 hours to replace the ASW pump 1-1 motor during Cycle 23. The July 7, 2021, letter contains the same information as in the advance draft copy provided to the staff earlier the same day, except for administrative corrections in the proposed TS pages.

Risk Insights:

RAI APLA-2

In the LAR, Section 3 under "Risk Insights", it was stated that, "The results demonstrate that ICCDP [incremental conditional core damage probability] and ICLERF [incremental conditional large early release frequency] are below the risk significance criteria of Regulatory Guide 1.174, 1.0E-06 and 1.0E-07, respectively. Therefore, the proposed separate one-time extension of TS 3.7.8 Condition A Required Action to 6-days for emergent maintenance for ASW Pump 1-1 Motor is considered to not be risk significant." It was not clear to the staff which measure of risk was used since Regulatory Guide (RG) 1.174 refers to CDF/LERF and Δ CDF/ Δ LERF.

- a. Clarify if ICLERP was intended in lieu of ICLERF and if so, should Regulatory Guide 1.177 guidance on iCCDP/iCLERP be cited for this one-time TS change?
- b. If not, justify how RG 1.174 metrics were used to conclude that maintenance on ASW Pump 1-1 Motor is not risk significant.

Hearing Identifier: NRR_DRMA
Email Number: 1261

Mail Envelope Properties (SA1PR09MB8653565788953DC54EB27B629A1A9)

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Sent Date: 7/7/2021 5:06:52 PM

Received Date: 7/7/2021 5:06:00 PM

From: Lee, Samson

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Tracking Status: None

Post Office: SA1PR09MB8653.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	1940	7/7/2021 5:06:00 PM

Options

Priority: Normal

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date: