UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

March 17, 2022

Ms. Paula A. Gerfen, Senior Vice President
and Chief Nuclear Officer
Pacific Gas and Electric Company
P.O. Box 56
Mail Code 104/6
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF NUCLEAR REGULATORY COMMISSION DESIGN BASES ASSURANCE INSPECTION (TEAM) 05000275/2022011 AND 05000323/2022011) AND INITIAL REQUEST FOR INFORMATION

Dear Ms. Gerfen:

The purpose of this letter is to notify you that U.S. Nuclear Regulatory Commission (NRC) staff will conduct a triennial baseline design bases assurance inspection at your Diablo Canyon Power Plant Units 1 and 2 beginning on May 9, 2022. The inspection will be conducted in accordance with NRC Inspection Procedure (IP) 71111.21M, "Design Bases Assurance Inspection (Team), dated December 8, 2016, by a team lead, two electrical engineering-focused inspectors, two mechanical engineering -focused inspectors, and one operations-focused inspector.

The inspection will consist of an information gathering visit by the team lead, in-office preparation, and two weeks of onsite inspection. The current inspection schedule is as follows:

- Onsite Information Gathering Visit: May 9-13, 2022.
- In-office Preparation Weeks: June 6-10, 2022, and June 20-24, 2022.
- Onsite Inspection Weeks: June 13-17, 2022, and June 27-July 1, 2022.

The purpose of the information gathering visit is to identify potential risk significant samples and operator actions. Additionally, the team lead will request a tour of the plant and interviews with operations and probabilistic safety assessment staff. During the onsite weeks, several days and administration will be needed on the plant-referenced simulator to facilitate performance of operator action-based scenarios and job performance measures. It has not yet been determined if the inspection will be onsite or conducted remotely. If the inspection is performed remotely, we are requesting that, as a minimum, actual on-site time be made available for 1-2 days to perform component and modification walkdowns. Simulator activities would have to be performed on site. Additional information and documentation needed to support the inspection will be identified during the inspection, including interviews with engineering managers, engineers, and probabilistic safety assessment staff.

The objectives of this inspection are to gain reasonable assurance that, 1) risk significant structures, systems, and components can adequately perform their design basis function, 2) modifications affecting the design and licensing bases have been adequately implemented, and 3) risk significant issues resulting from generic communications (i.e., operating experience) have been adequately addressed. Completion of this inspection procedure consists of a minimum sample size of eight component and modification samples and one operating experience sample.

To minimize the impact the inspection has on the site and to ensure an efficient inspection, we have enclosed a request for information needed for the inspection. It is important that these requests are fulfilled as completely and accurately as possible to minimize any additional requests during the preparation or onsite inspection weeks. The requests have been divided into three groups.

- The first group lists information necessary for our initial inspection scoping activities and sample selections. This information should be available to the team lead no later than April 29, 2022. By the end of the information gathering visit, the team lead will communicate the initial list of component, modification, and operating experience samples.

- The second group of information requested includes those items needed to support our in-office preparation activities. This set of documents should be available no later than June 3, 2022. This information should be separated for each sample, especially if provided electronically. Note that the team may identify additional information needed to support the inspection during this week and will communicate those requests as soon as practicable.

- The third group of information requested includes the additional documentation identified during in-office preparation activities as well as other resource requests necessary to support our onsite inspection activities. The additional information or resources should be available throughout the week of onsite inspection activities beginning on June 13, 2022.

All information requested are to be for the time period from the onsite inspection period back to the last triennial design bases assurance inspection (team). If nothing addressing a request was done in that time period, then the request applies to the last applicable document. If a request does not apply for any sample, no response is necessary. Include all attachments to the requests, especially corrective action program documents.

We have discussed the schedule for this inspection with your staff and understand that our regulatory contact for this inspection will be Ms. Amanda Sorensen. If there are any questions about this inspection or the documents requested, please contact the lead inspector, Ronald Kopriva, by telephone at 817-200-1104 or by e-mail at Ron.Kopriva@nrc.gov.

PAPERWORK REDUCTION ACT STATEMENT

This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: T6 A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) Office of Management and Budget, Washington, DC 20503.

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Sincerely,

Vincent G. Gaddy

Digitally signed by Vincent G. Gaddy
Date: 2022.03.17 15:11:26 -05'00'

Vincent G. Gaddy, Chief
Engineering Branch 1
Division of Operating Reactor Safety

Docket Nos. 05000275 and 05000323
License Nos. DPR-80 and DPR-82

Enclosure:
Design Bases Assurance Inspection
(Team) Request for Information

cc w/ encl: Distribution via LISTSERV®

DIABLO CANYON POWER PLANT, UNITS 1 AND 2 - NOTIFICATION OF NRC DESIGN BASES ASSURANCE INSPECTION (TEAM) (05000275/2022011 AND 05000323/2022011) AND INITIAL REQUEST FOR INFORMATION – DATED MARCH 17, 2022

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| ☒ SUNSI Review: By: RAK | ADAMS: ☒ Yes ☐ No | ☐ Non-Publicly Available ☒ Publicly Available | ☒ Non-Sensitive ☐ Sensitive | Keyword: NRC-002 |

| OFFICE | DORS:EB1 | DORS:EB1 | | | | |
|---|---|---|---|---|---|---|
| NAME | RAKopriva | VGGaddy | | | | |
| SIGNATURE | */RA/* | */RA/* | | | | |
| DATE | 3/16/2022 | 3/17/2022 | | | | |

**OFFICIAL RECORD COPY**

**Initial Request for Information**
**Design Bases Assurance Inspection (Team)**
**DIABLO CANYON POWER PLANT UNITS 1 & 2**

| | |
|---|---|
| Inspection Report: | 05000275/2022011 and 05000323/2022011 |
| EPID ID: | I-2022-011-0009 |
| Information Gathering Date: | May 9 - 13, 2022 |
| Inspection Dates: | June 13-17, 2022, and June 27-July 1, 2022 |
| Inspection Procedure: | IP 71111, Attachment 21M, "Design Bases Assurance Inspection Team" |
| Lead Inspector: | Ronald A. Kopriva, Senior Reactor Inspector |

## *I. Information Requested Prior to Information Gathering Visit (April 29, 2022)*

The following information (Section I of this enclosure) should be sent to the Region IV office in hard copy or electronic format (electronic database preferred), to the attention of Ronald A. Kopriva, Senior Reactor Inspector, by April 29, 2022, to facilitate the reduction in the items to be selected for a final list. The inspection team will finalize the selected list during the prep week using the additional documents requested in Section II of this enclosure. The specific items selected from the lists shall be available and ready for review on the day indicated in this request. *Please provide requested documentation electronically in "pdf" files, Excel, or other searchable formats, if possible. The information should contain descriptive names and be indexed and hyperlinked to facilitate ease of use. Information in lists should contain enough information to be easily understood by someone who has knowledge of boiling water reactor technology. If requested documents are large and only hard copy formats are available, please inform the inspector and provide subject documentation during the first day of the onsite inspection.

1. A sortable list of equipment basic events (with definitions), including importance measures sorted by risk achievement worth and Fussell-Vesely from your internal events probabilistic risk assessment. Include basic events with risk achievement worth value of 1.3 or greater.

2. A sortable list of the top 50 cut-sets from your PRA.

3. A copy of any probabilistic risk assessment "system notebooks" and the latest probabilistic risk assessment summary document.

4. A sortable list of probabilistic risk assessment human action basic events or risk ranking of operator actions from your site-specific PRA sorted by risk achievement worth and Fussell-Vesely. Provide copies of your human reliability worksheets for these items.

5. If you have an external events or fire PRA model, provide the information requested in items 1-4 for external events and fire.

6. A copy of the Individual Plant Examination of External Events (IPEEE).

7. A sortable list of high large early release frequency (LERF) impact events and associated components.

8. A sortable list of structures, systems, and components in the Maintenance Rule (a)(1) category.

9. A sortable list of high-risk maintenance rule systems/components and functions based on engineering or expert panel judgment.

10. A list of the stations “top 10 issues” if available.

11. A list of structures, systems, and components with associated calculations having low design margins if available.

12. A list of any common-cause failures of components.

13. A list of root cause evaluations associated with component failures of design issues initiated/completed in the last 5 years.

14. A copy of any time-critical and time-sensitive program procedures and a list of all time-critical and/or time-sensitive operator actions in procedures if not included.

15. A copy of any procedures used to accomplish operator actions associated with the basic events credited in your PRA.”

16. A sortable list of current “operator work arounds/burdens” and any program procedures related to operator work arounds/burdens.

17. A list, with brief descriptions, of permanent and temporary modifications implemented in the past 5 years to structures, systems, and components. Implemented means accepted or placed into service and declared functional or operable, as applicable. Modifications include, for example, permanent or temporary plant changes, design changes, set point changes, procedure changes, equivalency evaluations, suitability analyses, calculations, and commercial grade dedications.

18. A sortable list with brief descriptions of operating experience evaluations opened and/or closed. Include whether it was applicable and if the evaluation and any associated actions, such as modifications, procedure updates, etc., are complete.

19. A copy of any internal/external self-assessments or audits and associated corrective action documents generated in preparation for this inspection or related to engineering or operations.

20. A copy of the technical specifications, surveillance frequency control program, inservice testing program, preventive maintenance program, technical requirements manual, and the final safety analysis report (as updated). Include bases documents as applicable.

21. A copy of condition reports associated with inspection findings from the previous NRC design bases inspection.

22. A list of licensee contacts for the inspection team with phone numbers.

23. A copy of the current management and engineering organizational charts.

***II. Information Requested to be provided throughout the inspection****. (To be provided no later than June 3, 2022)*

1. Components

   a. A copy of the design bases document, system description, etc.

   b. A copy of any vendor manuals (e.g., operation and maintenance)

   c. A copy of any relevant, active calculations and drawings. If the number of calculations and/or drawings is extensive, provide a list instead.

   d. A list of the preventive maintenance schedule, including any inservice, surveillance, etc. testing, and a copy of the most recent performance of each

   e. A copy of the system health notebook

   f. A copy of any corrective action documents covering the past 3 years

   g. A copy of any relevant normal, abnormal, or emergency procedures

2. Modifications

   a. A copy of the complete change package

   b. A copy of the implementing work order, job, etc.

   c. A copy of post-modification testing work orders, jobs, etc.

   d. A copy of any associated corrective action documents

   e. A copy of any vendor manuals (e.g., operation and maintenance)

f. A copy of any updated procedures, licensing basis documents, calculations, drawings, etc.

3. Operating Experiences

   a. A copy of the complete operating experience evaluation

   b. A copy of any associated corrective action documents

   c. A copy of any associated change packages

   d. A copy of any updated procedures, licensing basis documents, calculations, drawings, etc.

### *III. Additional Requests During Onsite Inspection Activities:*

1. A copy of any corrective action documents generated because of the team's requests or questions during this inspection.

2. A copy of a list of questions submitted by the team and the status/resolution of the information requested (provide daily during the inspection to each team member).

Inspector Contact Information:


| | | |
|---|---|---|
| Ronald Kopriva, Lead<br>Senior Reactor Inspector<br>817-200-1104<br>Ron.Kopriva@nrc.gov | Jonathan Braisted<br>Reactor Inspector<br>817-200-1469<br>Jonathan.Braisted@nrc.gov | Dustin Reinert<br>Reactor Inspector<br>817-200-1534<br>Dustin.Reinert@nrc.gov |
| Shiattin Makor<br>Reactor Inspector<br>817-200-1507<br>Shiattin.Makor@nrc.gov | Nnaerika Okonkwo<br>Reactor Inspector<br>817-200-1114<br>Nnaerika.Okonkwo@nrc.gov | TBD<br>Operations Engineer |


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