

From: Lopez, Brandy
To: Samson, Lee
Cc: Soenen, Philippe
Subject: [External_Sender] RE: DCPD LA Nos. 242 and 243
Date: Monday, November 21, 2022 5:25:26 PM
Attachments: image001.png
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Classification: Internal

Hello Sam,

We have completed our review of License Amendment Numbers 242 and 243 and have the following four comments (includes comment previously provided via email below):

#	PG&E Submittals	NRC's SE	Comment																																
1	<p>PG&E's Mar 23, 2022 submittal shows the TSC changes, where grey boxes are current min staff:</p> <p>5.22 FIGURE 5-2. TSC ORGANIZATION</p>	<p>SE page 21 shows a table with TSC min staff changes:</p> <table><tr><th>Current Minimum TSC Staff Positions</th><th>Proposed Minimum TSC Staff Positions</th></tr><tr><td colspan="2">Note: response times are 90 minutes unless otherwise noted</td></tr><tr><td>Site Emergency Coordinator</td><td>Site Emergency Coordinator</td></tr><tr><td>Agency/ENS Communicator</td><td>ENS Communicator</td></tr><tr><td>Reactor Engineer</td><td>(Position Eliminated)</td></tr><tr><td>Communications Advisor</td><td>(Position Eliminated)</td></tr><tr><td>Radiological Data Processor</td><td>(Position Eliminated)</td></tr><tr><td>N/A</td><td>Radiological Advisor (Added as minimum staff)</td></tr><tr><td>N/A</td><td>Operations Advisor with a 60-minute response (Added as minimum staff)</td></tr><tr><td>N/A</td><td>Engineering Advisor with a 60-minute response (Added as minimum staff)</td></tr><tr><td>Security Coordinator</td><td>Security Advisor (Added as minimum staff)</td></tr></table>	Current Minimum TSC Staff Positions	Proposed Minimum TSC Staff Positions	Note: response times are 90 minutes unless otherwise noted		Site Emergency Coordinator	Site Emergency Coordinator	Agency/ENS Communicator	ENS Communicator	Reactor Engineer	(Position Eliminated)	Communications Advisor	(Position Eliminated)	Radiological Data Processor	(Position Eliminated)	N/A	Radiological Advisor (Added as minimum staff)	N/A	Operations Advisor with a 60-minute response (Added as minimum staff)	N/A	Engineering Advisor with a 60-minute response (Added as minimum staff)	Security Coordinator	Security Advisor (Added as minimum staff)	<p>PG&E's current DCP&E Plan does not include a Security Coordinator as min staff. However, all proposed min TSC staff (i.e., right column of SE table) align with PG&E's submittals.</p>										
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Note: response times are 90 minutes unless otherwise noted																																			
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2	<p>PG&E's Mar 23, 2022 submittal shows the OSC changes, where grey boxes are current min staff:</p> <p>5.23 FIGURE 5-3. OSC ORGANIZATION</p>	<p>SE page 22 shows a table with OSC min staff changes:</p> <table><tr><th>Current Minimum OSC Staff Positions</th><th>Proposed Minimum OSC Staff Positions</th></tr><tr><td colspan="2">Note: response times are 60 minutes unless otherwise noted</td></tr><tr><td>OSC Director</td><td>OSC Director</td></tr><tr><td>RP Personnel #1</td><td>RP Personnel #1</td></tr><tr><td>RP Personnel #2</td><td>RP Personnel #2</td></tr><tr><td>RP Personnel #3</td><td>(Position Eliminated)</td></tr><tr><td>RP Personnel #4 with a 90-minute response</td><td>(Position Eliminated)</td></tr><tr><td>RP Personnel #5 with a 90-minute response</td><td>(Position Eliminated)</td></tr><tr><td>RP Personnel #6 with a 90-minute response</td><td>(Position Eliminated)</td></tr><tr><td>Mechanical Maintenance Coordinator</td><td>Mechanical Maintenance Technician</td></tr><tr><td>Electrical Maintenance Coordinator</td><td>Electrical Maintenance Technician</td></tr><tr><td>I&C Maintenance Coordinator with a 90-minute response</td><td>(Position Eliminated)</td></tr><tr><td>Operations Coordinator with a 90-minute response</td><td>(Position Eliminated)</td></tr><tr><td>Site RP Coordinator</td><td>(Position Eliminated)</td></tr><tr><td>Onsite Field Team #1 Personnel (on-site surveys)</td><td>(Position Eliminated)</td></tr><tr><td>Onsite Field Team #1 Driver (on-site surveys)</td><td>(Position Eliminated)</td></tr></table>	Current Minimum OSC Staff Positions	Proposed Minimum OSC Staff Positions	Note: response times are 60 minutes unless otherwise noted		OSC Director	OSC Director	RP Personnel #1	RP Personnel #1	RP Personnel #2	RP Personnel #2	RP Personnel #3	(Position Eliminated)	RP Personnel #4 with a 90-minute response	(Position Eliminated)	RP Personnel #5 with a 90-minute response	(Position Eliminated)	RP Personnel #6 with a 90-minute response	(Position Eliminated)	Mechanical Maintenance Coordinator	Mechanical Maintenance Technician	Electrical Maintenance Coordinator	Electrical Maintenance Technician	I&C Maintenance Coordinator with a 90-minute response	(Position Eliminated)	Operations Coordinator with a 90-minute response	(Position Eliminated)	Site RP Coordinator	(Position Eliminated)	Onsite Field Team #1 Personnel (on-site surveys)	(Position Eliminated)	Onsite Field Team #1 Driver (on-site surveys)	(Position Eliminated)	<p>The SE table includes all current OSC staff in the left column, not just min staff as noted in the column titles. However, all proposed min OSC staff (i.e., right column of SE table) align with PG&E's submittals.</p>
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Note: response times are 60 minutes unless otherwise noted																																			
OSC Director	OSC Director																																		
RP Personnel #1	RP Personnel #1																																		
RP Personnel #2	RP Personnel #2																																		
RP Personnel #3	(Position Eliminated)																																		
RP Personnel #4 with a 90-minute response	(Position Eliminated)																																		
RP Personnel #5 with a 90-minute response	(Position Eliminated)																																		
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3	<p>PG&E's Oct 8, 2021 submittal, Enclosure 1, Section 5.2.4, shows the DCP&E Plan relies, in part, on 2 offsite FMTs as 90-minute responders with no proposed changes to those positions or response time:</p> <p>b. Off-site Surveys</p> <p>ON-SHIFT</p> <p>There are no requirements for staffing this position for the on-shift staffing.</p> <p>AUGMENTED ERO</p> <p>Current Requirements</p> <p>The following positions are Full Augmentation 90-minute responder staffing in the EOF:</p> <ul style="list-style-type: none">Two (2) off-site FMTs, each team consisting of a Leader (RP Technician) and Driver <p>Page 26</p> <p>Enclosure 1 PG&E Letter DCL-21-062 PG&E Letter DIL-21-007</p> <ul style="list-style-type: none">FMT CoordinatorFMT CommunicatorOffsite Emergency Lab Analyst <p>Proposed Change</p> <p>The FMT Coordinator position will be transferred from Full Augmentation to a Minimum Staff position. The FMT Communicator position will be eliminated. The Offsite Emergency Lab Analyst position will be removed from the DCP&E Plan and be controlled in EIPs.</p>	<p>SE page 23 shows a table with EOF min staff changes:</p> <table><tr><th>Current Minimum EOF Staff Positions</th><th>Proposed Minimum EOF Staff Positions</th></tr><tr><td colspan="2">Note: response times are 90 minutes unless otherwise noted</td></tr><tr><td>Emergency Director</td><td>Emergency Director</td></tr><tr><td>Communications Coordinator</td><td>Communications Coordinator</td></tr><tr><td>Offsite Communicator</td><td>(Position Eliminated)</td></tr><tr><td>Radiological Manager</td><td>Radiological Manager</td></tr><tr><td>Dose Assessor</td><td>Dose Assessor</td></tr><tr><td>N/A</td><td>Offsite Field Team #1 Personnel with a 60-minute response (Added as minimum staff)</td></tr><tr><td>N/A</td><td>Offsite Field Team #1 Driver with a 60-minute response (Added as minimum staff)</td></tr><tr><td>N/A</td><td>Offsite Field Team #2 Personnel (Added as minimum staff)</td></tr><tr><td>N/A</td><td>Offsite Field Team #2 Driver (Added as minimum staff)</td></tr></table>	Current Minimum EOF Staff Positions	Proposed Minimum EOF Staff Positions	Note: response times are 90 minutes unless otherwise noted		Emergency Director	Emergency Director	Communications Coordinator	Communications Coordinator	Offsite Communicator	(Position Eliminated)	Radiological Manager	Radiological Manager	Dose Assessor	Dose Assessor	N/A	Offsite Field Team #1 Personnel with a 60-minute response (Added as minimum staff)	N/A	Offsite Field Team #1 Driver with a 60-minute response (Added as minimum staff)	N/A	Offsite Field Team #2 Personnel (Added as minimum staff)	N/A	Offsite Field Team #2 Driver (Added as minimum staff)	<p>The two offsite FMTs currently have a 90-minute response. SE Section 3.2.4b (SE page 11) correctly shows that the two offsite FMTs have a 90-minute response. PG&E did not propose changing this response time for the PSEP.</p>										
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Emergency Director	Emergency Director																																		
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4	<p>PG&E's Oct 8, 2021 submittal, Enclosure 1, Section 5.2.4, proposes eliminating the onsite FMT:</p>	<p>SE page 24 discusses changes to EOF positions that will be controlled by the EIPs:</p> <p>The following full augmentation positions are proposed to be removed from the Diablo Canyon E-Plan, and managed and controlled by EIPs: Onsite FMT Leaders and Drivers, Offsite Emergency Lab Analyst, UDAC Meteorologist, and General Office Technical Liaison positions. The Offsite Emergency Lab Analyst, UDAC Meteorologist, and General Office Technical Liaison positions are proposed to still be assigned to ERO teams, be expected to maintain fitness-for-duty during assigned duty weeks, and be required to respond to the EOF at an Alert or higher emergency classification level.</p>	<p>SE Section 3.2.4c (SE page 12) correctly shows that the onsite FMT will be eliminated.</p>																																

<p>c. On-site (out-of-plant) Surveys</p> <p><u>ON-SHIFT</u></p> <p>There are no requirements for staffing this position for the on-shift staffing.</p> <p><u>AUGMENTED ERO</u></p> <p>Page 27</p> <hr/> <p style="text-align: right;">Enclosure 1 PG&E Letter DCL-21-062 PG&E Letter DIL-21-007</p> <p><u>Current Requirements</u></p> <p>One (1) on-site FMT, consisting of a Leader (RP Technician) and Driver in the OSC, are Full Augmentation Staff 60-minute responder positions.</p> <p><u>Proposed Change</u></p> <p>DCPP proposes to eliminate the one (1) on-site FMT.</p> <p><u>Analysis</u></p> <p>The scope of RP surveys is greatly reduced with the permanent cessation of operation of the reactors and the source term confined to the SFFs. One (1) RP Technician will be adequate to perform both the on-site (out-of-plant) and in-plant surveys. However, if conditions warrant, additional personnel are available to be called in by the OSC Director.</p>	<p>PG&E does not plan to control the onsite FMT in EPIPs in the PSEP. See also PG&E's Oct 8, 2021 submittal, Enclosure 1, Attachment 4, ERO Task Analysis, line 115, that also shows elimination.</p>
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Please let me know if you have any questions.

Thanks
 Brandy Lopez | Decommissioning Licensing Supervisor
 Pacific Gas and Electric Company
 805.540.4589 | Brandy.Lopez@pge.com

From: Samson Lee <Samson.Lee@nrc.gov>
Sent: Friday, November 18, 2022 3:57 AM
To: Lopez, Brandy <BNSM@pge.com>
Cc: Soenen, Philippe <PNS3@pge.com>
Subject: RE: DCPD LA Nos. 242 and 243

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Brandy,

Good morning. Thanks for the heads up. We'll wait for you to complete your review.

Have a nice weekend,
 Sam

From: Lopez, Brandy <BNSM@pge.com>
Sent: Thursday, November 17, 2022 8:18 PM
To: Samson Lee <Samson.Lee@nrc.gov>
Cc: Soenen, Philippe <PNS3@pge.com>
Subject: [External_Sender] DCPD LA Nos. 242 and 243

Hello Sam,

We received the attached NRC letter, Diablo Canyon Nuclear Power Plant, Units 1 And 2 Issuance Of Amendment Nos. 242 and 243 Re: Revision To Emergency Plan For Post-Shutdown And Permanently Defueled Condition (EPID L-2021-LLA-0190), through the advanced listserv. We started our review today and have identified one correction described below:

SE Section 3.2.4b (page 11 of the SE or pg 17 of the pdf) correctly shows that the two offsite field monitoring teams (FMTs) have a 90-minute response. PG&E did not propose changing this response time for the PSEP. However, SE Section 4.1.3 (page 23 of the SE or pg 29 of the pdf) shows the response time for one of the offsite FMTs as 60 minutes.

I wanted to let you know that we found one correction needed and will complete our review of the license amendment next week. I will let you know by COB, Monday 11/21 if any additional items are identified.

Thanks
 Brandy Lopez | Decommissioning Licensing Supervisor
 Pacific Gas and Electric Company
 805.540.4589 | Brandy.Lopez@pge.com