



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 1, 2022

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

SUBJECT: DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 –  
CORRECTION TO ISSUANCE OF AMENDMENT NOS. 242 AND 243 RE:  
REVISION TO EMERGENCY PLAN FOR POST-SHUTDOWN AND  
PERMANENTLY DEFUELED CONDITION (EPID L-2021-LLA-0190)

Dear Ms. Gerfen:

By letter dated November 16, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22187A025), the U.S. Nuclear Regulatory Commission (NRC, the Commission) issued Amendment No. 242 to Facility Operating License No. DPR-80 and Amendment No. 243 to Facility Operating License No. DPR-82 for Diablo Canyon Nuclear Power Plant (Diablo Canyon), Units 1 and 2, respectively. The amendments revised the Diablo Canyon, Units 1 and 2, emergency plan for the post-shutdown and permanently defueled condition.

After the issuance of the amendments, Pacific Gas and Electric Company (the licensee) provided comments identifying errors in the amendments by an email dated November 21, 2022 (ML22326A163). The NRC staff determined that the errors are administrative in nature. The corrections do not change any of the conclusions in the safety evaluation associated with the amendments and do not affect the associated notice to the public.

The enclosure to this letter contains corrected safety evaluation pages 21, 22, 23, and 24. The revised pages contain marginal lines indicating the areas of change. Please replace the corresponding safety evaluation pages issued by Amendment Nos. 242 and 243 for Diablo Canyon, Units 1 and 2.

P. Gerfen

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If you have any questions, please contact me at 301-415-3168 or [Samson.Lee@nrc.gov](mailto:Samson.Lee@nrc.gov).

Sincerely,

**/RA/**

Samson S. Lee, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:  
Corrected safety evaluation  
pages 21, 22, 23, and 24

cc: Listserv

**ENCLOSURE**

CORRECTED SAFETY EVALUATION PAGES 21, 22, 23, and 24

RELATED TO AMENDMENT NO. 242 TO FACILITY OPERATING LICENSE NO. DPR-80

AND AMENDMENT NO. 243 TO FACILITY OPERATING LICENSE NO. DPR-82

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-275 AND 50-323

The following table illustrates the NRC staff's summary of the licensee's proposed changes to the TSC minimum staffing positions:

<b>Current Minimum TSC Staff Positions</b>	<b>Proposed Minimum TSC Staff Positions</b>
<b>Note: response times are 90 minutes unless otherwise noted</b>	
Site Emergency Coordinator	Site Emergency Coordinator
Agency/ENS Communicator	ENS Communicator
Reactor Engineer	<b><i>(Position Eliminated)</i></b>
Communications Advisor	<b><i>(Position Eliminated)</i></b>
Radiological Data Processor	<b><i>(Position Eliminated)</i></b>
N/A	Radiological Advisor <b><i>(Added as minimum staff)</i></b>
N/A	Operations Advisor with a 60-minute response <b><i>(Added as minimum staff)</i></b>
N/A	Engineering Advisor with a 60-minute response <b><i>(Added as minimum staff)</i></b>
N/A	Security Advisor <b><i>(Added as minimum staff)</i></b>

The NRC staff's discussion and evaluation of the Engineering Advisor position and the elimination of the Reactor Engineer is provided in section 3.2.5 of this SE. The licensee stated that the Communications Advisor position can be eliminated in the TSC because the performance of State/local notifications and protective action recommendations are no longer supported in the TSC. This function is directly transferred from on-shift to the EOF. The performance of NRC notification is assigned to the ENS Communicator. The licensee further stated that the Radiological Data Processor can be eliminated due to the reduced scope and consequences of accidents associated with defueled reactors, this task is adequately performed by the EOF Dose Assessor.

#### NRC Staff Conclusion

Based on the NRC staff's review of the information provided in the licensee's application, as supplemented, the NRC staff finds that the proposed level of augmented staffing continues to meet the planning standard of 10 CFR 50.47(b)(2) for augmentation of response capabilities, and the requirements of Section IV.A of Appendix E to 10 CFR Part 50 to describe the organization for coping with radiological emergencies, commensurate with the reduced spectrum of credible accidents in the permanently shutdown and defueled condition of the Diablo Canyon facility. As such, the NRC staff finds that the proposed changes to ERO staffing for this facility are acceptable and do not impact the licensee's ability to perform the required facility functions.

#### 4.1.2 Operations Support Center

The current Diablo Canyon E-Plan states that the OSC is the onsite location to where station support personnel report during an emergency and from which they will be dispatched for assignments or duties in support of emergency operations. The OSC will be activated whenever the TSC is activated but need not remain activated at the Alert level if its use is judged

unnecessary by the Station Emergency Director. The OSC is equipped with communication links to the control room, the TSC and the EOF.

Restoration of equipment supporting SFP cooling, and inventory will be the primary focus of emergency mitigation actions for the TSC/OSC in the permanently shutdown and defueled condition. However, the applicant states that OSC staff is not relied upon to implement SFP inventory makeup. In the permanently shutdown and defueled condition, the primary functions of the OSC will be the dispatching of and accounting for, repair and corrective action teams. The OSC Director is responsible for ensuring adequate staffing of the OSC supporting the emergency, working with the TSC staff to set priorities for the OSC, and directing the activities of the OSC to support the emergency response. The OSC is equipped with communication links to the control room, the TSC and the EOF.

The following table illustrates the NRC staff's summary of the licensee's proposed changes to the OSC minimum staffing positions:

<b>Current OSC Staff Positions</b>	<b>Proposed Minimum OSC Staff Positions</b>
<b>Note: response times are 60 minutes unless otherwise noted</b>	
OSC Director	OSC Director
RP Personnel #1	RP Personnel #1
RP Personnel #2	RP Personnel #2
RP Personnel #3	<b><i>(Position Eliminated)</i></b>
RP Personnel #4 with a 90-minute response	<b><i>(Position Eliminated)</i></b>
RP Personnel #5 with a 90-minute response	<b><i>(Position Eliminated)</i></b>
RP Personnel #6 with a 90-minute response	<b><i>(Position Eliminated)</i></b>
Mechanical Maintenance Coordinator	Mechanical Maintenance Technician
Electrical Maintenance Coordinator	Electrical Maintenance Technician
I&C Maintenance Coordinator with a 90-minute response	<b><i>(Position Eliminated)</i></b>
Operations Coordinator with a 90-minute response	<b><i>(Position Eliminated)</i></b>
Site RP Coordinator	<b><i>(Position Eliminated)</i></b>
Onsite Field Team #1 Personnel (on-site surveys)	<b><i>(Position Eliminated)</i></b>
Onsite Field Team #1 Driver (on-site surveys)	<b><i>(Position Eliminated)</i></b>

The NRC staff's evaluation of the post-shutdown Diablo Canyon E-Plan minimum staffing positions and staffing position eliminations is provided in sections 3.2.4.c, 3.2.4.d, 3.2.5.b, and 3.2.6 of this SE.

The NRC staff reviewed the licensee's analysis of the OSC augmented staffing and determined that the proposed elimination of the augmented staffing is acceptable because it does not impact the licensee's ability to perform the required E-Plan functions and tasks during the Diablo Canyon post-shutdown permanently defueled condition.

**NRC Staff Conclusion**

Based on the NRC staff's review of the information provided in the licensee's application, as supplemented, the NRC staff finds that the proposed level of augmented staffing continues to meet the planning standard of 10 CFR 50.47(b)(2) for augmentation of response capabilities,

and the requirements of Section IV.A of Appendix E to 10 CFR Part 50 to describe the organization for coping with radiological emergencies, commensurate with the reduced spectrum of credible accidents in the permanently shutdown and defueled condition of the Diablo Canyon facility. As such, the NRC staff finds that the proposed changes to ERO staffing for this facility are acceptable and do not impact the licensee's ability to perform the required facility functions.

#### 4.1.3 Emergency Operations Facility

The licensee stated that the proposed changes to the EOF minimum staff do not impact the capability to assess and monitor actual or potential offsite consequences of a radiological emergency. The licensee concluded that appropriate assessment and mitigation are well within the capabilities of the proposed EOF minimum staff.

The following table illustrates the NRC staff's summary of the licensee's proposed changes to the EOF minimum staffing positions:

<b>Current Minimum EOF Staff Positions</b>	<b>Proposed Minimum EOF Staff Positions</b>
<b>Note: response times are 90 minutes unless otherwise noted</b>	
Emergency Director	Emergency Director
Communications Coordinator	Communications Coordinator
Offsite Communicator	<b><i>(Position Eliminated)</i></b>
Radiological Manager	Radiological Manager
Dose Assessor	Dose Assessor
N/A	Offsite Field Team #1 Personnel <b><i>(Added as minimum staff)</i></b>
N/A	Offsite Field Team #1 Driver <b><i>(Added as minimum staff)</i></b>
N/A	Offsite Field Team #2 Personnel <b><i>(Added as minimum staff)</i></b>
N/A	Offsite Field Team #2 Driver <b><i>(Added as minimum staff)</i></b>
N/A	EOF Director <b><i>(Added as minimum staff)</i></b>
N/A	Advisor to the County <b><i>(Added as minimum staff)</i></b>
N/A	FMT Coordinator <b><i>(Added as minimum staff)</i></b>
N/A	Engineering Liaison <b><i>(Added as minimum staff)</i></b>
N/A	Government Relations Coordinator <b><i>(Added as minimum staff)</i></b>

The licensee stated that the EOF currently has the following ERO non-minimum augmented staff:

- EOF Director
- HPN Communicator

- Engineering Liaisons
- Advisor to the County Emergency Operations Center
- Government Relations Coordinator
- General Office Technical Liaison
- Dose Assessment Coordinator
- UDAC Meteorologist
- FMT Coordinator
- Two Offsite FMTs, each consisting of one Leader (RP Technician) and one Driver
- Onsite FMT, consisting of one Leader (RP Technician) and one Driver
- FMT Communicator
- Offsite Emergency Lab Analyst
- Security Liaison
- EOF Security

The licensee proposes to remove all the EOF non-minimum augmented staff except for one EOF Director, one Advisor to the County, one FMT Coordinator, one Engineering Liaison, four offsite FMT Leaders and Drivers, and one Government Relations Coordinator following permanent shutdown. These positions are proposed to be designated as minimum staff positions.

The following full augmentation positions are proposed to be removed from the Diablo Canyon E-Plan, and managed and controlled by EIPs: 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.

The licensee proposes to change the non-minimum augmented staff for the offsite survey task for the post-shutdown permanently defueled condition as follows:

- FMT Coordinator position will be transferred from full augmentation to a minimum staff position;
- Eliminate FMT Communicator position, and
- Offsite Emergency Lab Analyst position will be removed from the Diablo Canyon E-Plan and controlled in EIPs.

The licensee stated that with the source term maintained in the SFPs, there are fewer release paths, reducing the scope of information related to a Diablo Canyon event. The licensee concluded that due to the reduced scope of information, the combination of dedicated staffing of the above listed positions is not required. The licensee stated that the task of the FMT Communicator is to establish and maintain communications with the FMTs and to record and report field monitoring survey, sample, and exposure information. Those tasks are proposed to be assigned to the FMT Coordinator position that would be minimum staff. As such, the licensee concluded that the FMT Communicator can be removed from the Diablo Canyon E-Plan without impacting Diablo Canyon's ability to respond to the spectrum of credible accidents and operational events for a permanently shutdown and defueled reactor.

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 DATED DECEMBER 1, 2022

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**ADAMS Accession No. ML22334A082**

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DATE	11/22/2022	12/1/2022	11/23/2022
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DATE	12/1/2022	12/1/2022	

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