



**Pacific Gas and
Electric Company**

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November 24, 1999

PG&E Letter DCL-99-146

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2

**Request for NRC Approval of Diablo Canyon Methodology for Establishing Pressure/
Temperature and Low Temperature Overpressure Protection Limits Using WCAP
14040-NP-A in Accordance with Generic Letter 96-03**

Dear Commissioners and Staff:

On May 28, 1999, the NRC issued License Amendment (LA) Nos. 135 and 135 for Diablo Canyon Power Plants (DCPP) Units 1 and 2, respectively. These LAs issued a new set of Improved Technical Specifications (ITS) based on NUREG-1431. As part of these LAs, the reactor coolant system pressure and temperature limits were relocated from the Technical Specifications (TS) and replaced by an administrative TS to establish a pressure and temperature limits report (PTLR). However, the safety evaluation associated with the LAs states that although the limits may be included in the PTLR, they cannot be changed without prior NRC approval until a PTLR is reviewed and approved by the NRC in accordance with the requirements of Generic Letter (GL) 96-03.

GL 96-03 allows the relocation of the pressure and temperature limits from the TS upon obtaining NRC approval of the PTLR. GL 96-03 specifically requires that to relocate the pressure and temperature limits, the licensee must (1) use a methodology to develop the pressure and temperature limits that is approved by the NRC; (2) develop a report that contains the pressure and temperature figures, values, and parameters, and any explanations necessary to understand them; and (3) modify the TS accordingly.

On May 3, 1999, the NRC issued LAs 133 and 131 for DCPP Units 1 and 2, respectively. These LAs issued new pressure and temperature curves. The supporting license amendment request included detailed descriptions of the methodology used to develop the curves. PG&E believes that it has provided adequate information to the NRC to allow the methodology used to develop the pressure and temperature limits in

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LAs 133 and 131 issued for DCPD Units 1 and 2 to be generically approved as required by GL 96-03. The information on the methodology used was provided in PG&E letters DCL-98-121, "License Amendment Request 98-06," dated September 3, 1998; DCL-99-005, "Supplement to LAR 98-06," dated January 22, 1999; and DCL-99-017, "Supplement to LAR 98-06," dated February 5, 1999. The methodology is that specified in WCAP 14040-NP-A, Revision 2, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RSC Heatup and Cooldown Limit Curves," dated January 1996.

To satisfy the other requirements of GL 96-03, enclosed are a draft PTLR and marked up ITS page. The no significant hazards consideration and environmental impact determination provided in DCL-98-121 are still applicable.

Sincerely,



David H. Oatley

cc: Edgar Bailey, DHS
Steven D. Bloom
Ellis W. Merschoff
David L. Proulx
Diablo Distribution

Enclosures

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of PACIFIC GAS AND ELECTRIC COMPANY)	Docket No. 50-275
)	Facility Operating License
)	No. DPR-80
Diablo Canyon Power Plant Units 1 and 2)	Docket No. 50-323
)	Facility Operating License
)	No. DPR-82

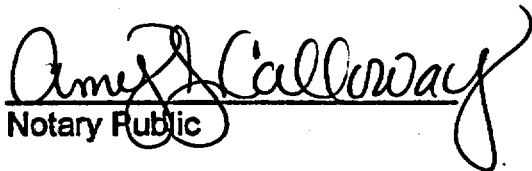
AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath says that he is Vice President - Diablo Canyon Operations and Plant Manager of Pacific Gas and Electric Company; that he is familiar with the content thereof; that he has executed Request for NRC approval of Diablo Canyon Methodology for Establishing Pressure/Temperature and Low Temperature Overpressure Protection Limits on behalf of said company with full power and authority to do so; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.



David H. Oatley
Vice President - Diablo Canyon Operations
and Plant Manager

Subscribed and sworn to before me this 24th day of November, 1999
County of San Luis Obispo
State of California


Notary Public

PROPOSED PRESSURE TEMPERATURE LIMITS REPORT