

June 9, 2003

MEMORANDUM TO: Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Jack N. Donohew, Senior Project Manager, Section 2 /RA/
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 -
LICENSEE'S AGREEMENT TO REVISED WORDING IN PROPOSED
LICENSE AMENDMENT INVOLVING POSITIVE REACTIVITY
ADDITIONS (TAC NOS. MB4996 AND MB4997)

By letter dated April 10, 2002 (DCL-02-038), Pacific Gas and Electric Company (the licensee) submitted changes to incorporate TSTF-286, Revision 2, into the Technical Specifications (TSs) for Diablo Canyon Nuclear Power Plant (DCPP), Units 1 and 2. The changes would remove restrictions in the TSs on not adding positive reactivity to the core.

In the application, the licensee proposed changes to the Notes to Limiting Conditions for Operation (LCOs) 3.4.5, 3.4.6, 3.4.7, 3.4.8, and 3.9.5, and to Required Actions 3.4.5.D.2, 3.4.6.B.1, 3.4.7.B.1, 3.4.8.B.1, 3.9.3.A.2, 3.9.5.A.1, and 3.9.6.B.1. The licensee had proposed wording in accordance with TSTF-286, Revision 2. In reviewing the proposed changes, the staff has decided that the proposed wording could be made clearer. This is explained below. In each case, the difference is shown underlined in the application and in **bold** in the staff-requested wording.

The proposed Notes, except for LCO 3.9.5, state, "No operations are permitted that would cause introduction into the RCS [Reactor Coolant System], coolant with boron concentration less than required to meet the SDM [Shutdown Margin] of LCO 3.1.1." The staff concludes that the Notes should read, "No operations are permitted that would cause introduction **of coolant into the RCS** with boron concentration less than required to meet the SDM of LCO 3.1.1."

For LCO 3.9.5, the Note states, "...no operations are permitted that would cause introduction into the Reactor Coolant System, coolant with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1." The staff concludes that the Note should read, "...no operations are permitted that would cause introduction **of coolant into the Reactor Coolant System** with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1."

The proposed Required Actions (except 3.9.3.A.2, 3.9.5.A.1, and 3.9.6.B.1 below) state, "Suspend operations that would cause introduction into the RCS, coolant with boron

concentration less than required to meet SDM of LCO 3.1.1." The staff concludes that the Required Actions should read, "Suspend operations that would cause introduction **of coolant into the RCS** with boron concentrations less than required to meet **the** SDM of LCO 3.1.1." Proposed Required Actions 3.9.3.A.2, 3.9.5.A.1, and 3.9.6.B.1 state, "Suspend operations that would cause introduction into the RCS, coolant with boron concentrations less than required to meet the boron concentration of LCO 3.9.1." The staff concludes that the Required Actions should read, "Suspend operations that would cause introduction **of coolant into the RCS** with boron concentrations less than required to meet the boron concentration of LCO 3.9.1."

The staff believes that the above changes make the statements in the Notes and Required Actions clearer than the words in DCL-02-038, which uses wording in accordance with TSTF-286, Revision 2, that the Notes and Required Actions are preventing "introduction of coolant into the RCS" of boron concentration greater than the LCO 3.1.1 required SDM and LCO 3.9.1 required boron concentration. This prevents the core from having an unacceptable reactivity.

The staff requested by e-mail that the licensee agree to having the revised wording added to the TSs as part of its proposed license amendment request. As stated in the attached e-mail, the licensee agrees to the revised wording.

Docket Nos. 50-275 and 50-323

Attachment: E-mail dated May 28, 2003

Required Actions should read, "Suspend operations that would cause introduction **of coolant into the RCS** with boron concentrations less than required to meet **the** SDM of LCO 3.1.1." Proposed Required Actions 3.9.3.A.2, 3.9.5.A.1, and 3.9.6.B.1 state, "Suspend operations that would cause introduction into the RCS, coolant with boron concentrations less than required to meet the boron concentration of LCO 3.9.1." The staff concludes that the Required Actions should read, "Suspend operations that would cause introduction **of coolant into the RCS** with boron concentrations less than required to meet the boron concentration of LCO 3.9.1."

The staff believes that the above changes make the statements in the Notes and Required Actions clearer than the words in DCL-02-038, which uses wording in accordance with TSTF-286, Revision 2, that the Notes and Required Actions are preventing "introduction of coolant into the RCS" of boron concentration greater than the LCO 3.1.1 required SDM and LCO 3.9.1 required boron concentration. This prevents the core from having an unacceptable reactivity.

The staff requested by e-mail that the licensee agree to having the revised wording added to the TSs as part of its proposed license amendment request. As stated in the attached e-mail, the licensee agrees to the revised wording.

Docket Nos. 50-275 and 50-323

Attachment: E-mail dated May 28, 2003

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E-MAIL DATED MAY 28, 2003

From: Ketelsen, Stan C
Sent: Wednesday, May 28, 2003 3:53 PM
To: 'jnd@nrc.gov'; 'dhj@nrc.gov'
Cc: Radford, James; Schrader, Kenneth
Subject: FW: Requested agreement to change in wording for certain proposed Notes

Dave/Jack -

We concur with the editorial changes suggested in the below e-mail. We have had the TS pages revised. Per discussions with Dave this morning, we are converting the pages to pdf format and will e-mail the files to you. You should have them by tomorrow morning. Thanks.

Stan

-----Original Message-----

From: Grozan, Thomas C
Sent: Friday, May 16, 2003 12:18 PM
To: Ketelsen, Stan C; Cossette, Larry
Subject: FW: Requested agreement to change in wording for certain proposed Notes

fyi

-----Original Message-----

From: Jack Donohew [<mailto:JND@nrc.gov>]
Sent: Friday, May 16, 2003 11:04 AM
To: Grozan, Thomas C
Subject: Requested agreement to change in wording for certain proposed Notes

In your application dated December 4, 2002, you proposed changes to certain Notes for LCOs and certain Required Actions to allow controlled introduction of positivity reactivity changes to the core. The proposed changes are to the Notes for LCOs 3.4.5, 3.4.6, 3.4.7, 3.4.8, and 3.9.5, and to Required Actions 3.4.5.D.2, 3.4.6.B.1, 3.4.7.B.1, 3.4.8.B.1, 3.9.3.A.2, 3.9.5.A.1, and 3.9.6.B.1.

The proposed Notes except LCO 3.9.5 state no "operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1". The staff requests that the Notes read that no "operations are permitted that would cause introduction **of coolant into the RCS** with boron concentration less than required

to meet the SDM of LCO 3.1.1". The difference is shown underlined in the application wording and in bold in the staff-requested wording.

The proposed Note to LCO 3.9.5 states no "operations are permitted that would cause introduction into the Reactor Coolant System (RCS), coolant with boron concentration less than that required to meet the boron concentration of LCO 3.9.1". The staff requests that the Notes read that no "operations are permitted that would cause introduction **of coolant into the Reactor Coolant System (RCS)** with boron concentration less than that required to meet the boron concentration of LCO 3.9.1". The difference is shown underlined in the application wording and in bold in the staff-requested wording.

The proposed Required Actions except Actions 3.9.3.A.2, 3.9.5.A.1, and 3.9.6.B.1 state "Suspend operations that would cause introduction into the RCS, coolant with boron concentrations less than required to meet SDM of LCO 3.1.1." The staff requests that the required Actions read "Suspend operations that would cause introduction **of coolant into the RCS** with boron concentrations less than required to meet **the** SDM of LCO 3.1.1." Again the difference is shown underlined and in bold.

For proposed Required Actions 3.9.3.A.2, 3.9.5.A.1, and 3.9.6.B.1 states ""Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1." The staff requests that the Required Action reads "Suspend operations that would cause introduction **of coolant into the RCS** with boron concentration less than required to meet the boron concentration of LCO 3.9.1." The difference is again underlined and in bold.

The staff believes that the staff requested changes make the statements in the Notes and Required Actions clearer, than the words in the application from TSTF 286, Revision 2, that the Notes and Required Actions are preventing "introduction of coolant unto the RCS" of boron concentration greater than the LCO 3.1.1 required SDM and LCO 3.9.1 required boron concentration.

Do you agree to the changes requested by the staff to have clearer TS wording.

Please delete any statement that might be boilerplate in your response that the information provided (your response to my question) should be considered confidential because our intent is to docket your statement about whether our proposed wording for the above notes and required actions is acceptable.

<JND>