



**Pacific Gas and
Electric Company**

David H. Oatley
Vice President and
General Manager

Diablo Canyon Power Plant
P.O. Box 56
Avila Beach, CA 93424

805.545.4350
Fax: 805.545.4234

June 5, 2003

PG&E Letter DCL-03-067

**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
License Amendment Request 03-08
Revision to Technical Specification 3.5.1. "Emergency Core Cooling
Systems/Accumulator"**

Dear Commissioners and Staff:

In accordance with 10 CFR 50.90, enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant (DCPP), respectively. The enclosed license amendment request (LAR) proposes to revise the Technical Specifications (TS) to extend the completion time (one accumulator inoperable for reasons other than boron concentration not within limits) from 1 hour to 24 hours for Condition B of TS 3.5.1, "Accumulators."

The change is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-370, "Risk Informed Evaluation of an Extension to Accumulator Completion Times for Westinghouse Plants." The availability of this TS improvement was announced in the Federal Register on March 12, 2003, as part of the consolidated line item improvement process.

Enclosure 1 contains a description of the proposed change and confirmation of applicability. Enclosures 2 and 3 contain marked-up and revised (clean) TS pages, respectively. Enclosure 4 provides the existing TS Bases pages marked-up to reflect the proposed change (for information only). TS Bases changes will be implemented pursuant to TS 5.5.14, "Technical Specifications Bases Control Program."

AOO1

PG&E requests approval of the proposed license amendment by June 2004, to be implemented within 60 days of its issuance. The approval date was administratively selected to allow for NRC review. The plant does not require this amendment to allow continued operations.

PG&E is submitting this LAR as a result of a mutual agreement by an industry consortium of six plants known as Strategic Teaming and Resources Sharing (STARS). The STARS group consists of six plants operated by TXU Energy, AmerenUE, Wolf Creek Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, and Arizona Public Service Company. Comanche Peak is the lead plant for this license amendment; however, only DCPD will be submitting a parallel submittal because the remaining STARS plants already have this change approved.

If you have any questions or require additional information, please contact Stan Ketelsen at (805) 545-4720.

Sincerely,



David H. Oatley
Vice President and General Manager – Diablo Canyon

WHY/4279

Enclosures

cc: Edgar Bailey, DHS
Thomas P. Gwynn
David L. Proulx
Diablo Distribution
cc/enc: David H. Jaffe

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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


AFFIDAVIT

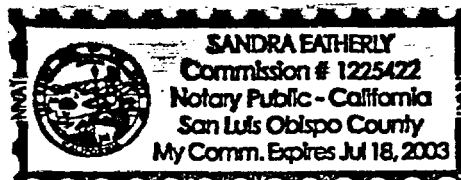
David H. Oatley, of lawful age, first being duly sworn upon oath says that he is Vice President and General Manager – Diablo Canyon of Pacific Gas and Electric Company; that he has executed license amendment request LAR 03-08 on behalf of said company with full power and authority to do so; that he is familiar with the content thereof; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.



David H. Oatley
Vice President and General Manager – Diablo Canyon

Subscribed and sworn to before me this 5th day of June 2003.


Notary Public
County of San Luis Obispo
State of California



DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

This letter is a request to amend Operating Licenses DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant (DCPP), respectively.

The proposed license amendment extends the completion time from 1 hour to 24 hours for Condition B of Technical Specification (TS) 3.5.1, "Accumulators."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-370, "Risk Informed Evaluation of an Extension to Accumulator Completion Times for Westinghouse Plants." The availability of this TS improvement was announced in the Federal Register on March 12, 2003, as part of the consolidated line item improvement process (CLIIP).

No changes to the DCPP Final Safety Analysis Report are anticipated at this time as a result of this License Amendment Request.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

PG&E has reviewed the safety evaluation published on July 15, 2002, (67 FR 46542) as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-370 (i.e., WCAP-15049-A, "Risk-Informed Evaluation of an Extension to Accumulator Completion Times," dated April 1999). PG&E has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to DCPP Unit 1 and Unit 2 and justify this amendment for the incorporation of the changes to the DCPP TS.

2.2 Optional Changes and Variations

PG&E is not proposing any variations or deviations from the TS changes described in TSTF-370 or the NRC staff's model safety evaluation published on July 15, 2002.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

PG&E has reviewed the proposed no significant hazards consideration determination published on July 15, 2002, (67 FR 46542) as part of the

consolidated line item improvement process (CLIIP). PG&E has concluded that the proposed determination presented in the notice is applicable to Diablo Canyon Power Plant (DCPP), Unit 1 and Unit 2, and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

There are no new regulatory commitments associated with this proposed change.

4.0 ENVIRONMENTAL EVALUATION

PG&E has reviewed the environmental evaluation included in the model safety evaluation published on July 15, 2002, (67 FR 46542) as part of the CLIIP. PG&E has concluded that the NRC staff's findings presented in that evaluation are applicable to DCPP Unit 1 and Unit 2 and the evaluation is hereby incorporated by reference for this application.

Proposed Technical Specification Changes (mark-up)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.1 Accumulators

LCO 3.5.1 Four ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2, MODE 3 with RCS pressure > 1000 psig.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One accumulator inoperable due to boron concentration not within limits.	A.1 Restore boron concentration to within limits.	72 hours
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	4 24 hours
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Reduce RCS pressure to ≤ 1000 psig.	12 hours
D. Two or more accumulators inoperable.	D.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.1.1	Verify each accumulator isolation valve is fully open.	12 hours
SR 3.5.1.2	Verify borated water volume in each accumulator is ≥ 814 ft ³ and ≤ 886 ft ³ .	12 hours
SR 3.5.1.3	Verify nitrogen cover pressure in each accumulator is ≥ 579 psig and ≤ 664 psig.	12 hours

(continued)

Proposed Technical Specification Changes (retyped)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.1 Accumulators

LCO 3.5.1 Four ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2, MODE 3 with RCS pressure > 1000 psig.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One accumulator inoperable due to boron concentration not within limits.	A.1 Restore boron concentration to within limits.	72 hours
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Reduce RCS pressure to ≤ 1000 psig.	12 hours
D. Two or more accumulators inoperable.	D.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.1.1	Verify each accumulator isolation valve is fully open.	12 hours
SR 3.5.1.2	Verify borated water volume in each accumulator is ≥ 814 ft ³ and ≤ 886 ft ³ .	12 hours
SR 3.5.1.3	Verify nitrogen cover pressure in each accumulator is ≥ 579 psig and ≤ 664 psig.	12 hours

(continued)

Technical Specification Bases Pages (for information only)

BASES (continued)

APPLICABILITY

In MODES 1 and 2, and in MODE 3 with RCS pressure > 1000 psig, the accumulator OPERABILITY requirements are based on full power operation. Although cooling requirements decrease as power decreases, the accumulators are still required to provide core cooling as long as elevated RCS pressures and temperatures exist.

This LCO is only applicable at RCS pressures > 1000 psig. At pressures \leq 1000 psig, the rate of RCS blowdown is such that the ECCS pumps can provide adequate injection to ensure that peak clad temperature remains below the 10 CFR 50.46 (Ref. 2) limit of 2200°F.

In MODE 3, with RCS pressure \leq 1000 psig, and in MODES 4, 5, and 6, the accumulator motor operated isolation valves are normally closed to isolate the accumulators from the RCS. This allows RCS cooldown and depressurization without discharging the accumulators into the RCS or requiring depressurization of the accumulators.

Accumulator may be unisolated when accumulator pressure is less than the maximum RCS pressure for the existing RCS cold leg temperature allowed by the P/T limit curves provided in the PTLR. This condition is in agreement with the TS 3.4.12 LCO requirement.

ACTIONS

A.1

If the boron concentration of one accumulator is not within limits, it must be returned to within the limits within 72 hours. In this Condition, the ability to maintain subcriticality or minimum boron precipitation time may be reduced. The boron in the accumulators contributes to the assumption that the combined ECCS water in the partially recovered core during the early reflooding phase of a large break LOCA is sufficient to keep that portion of the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current analyses demonstrate that the accumulators will discharge following a large main steam line break. The impact of their discharge is minor and not a design limiting event. Thus, 72 hours is allowed to return the boron concentration to within limits.

B.1

If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 4-24 hours. In this Condition, the required contents of three accumulators cannot be assumed to reach the core during a LOCA. Due to the severity of the consequences should a LOCA occur in these conditions, the 4-24 hours Completion Time to open the valve, remove

(continued)

BASES

ACTIONS

B.1 (continued)

power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The Completion Time minimizes the potential for exposure of the plant to a LOCA under these conditions. The 24 hours allowed to restore an inoperable accumulator to OPERABLE status is justified in WCAP-15049-A, Rev 1. (Ref. 7)

C.1 and C.2

If the accumulator cannot be returned to OPERABLE status within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and RCS pressure reduced to ≤ 1000 psig within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

D.1

If more than one accumulator is inoperable, the plant is in a condition outside the accident analyses; therefore, LCO 3.0.3 must be entered immediately.

SURVEILLANCE REQUIREMENTS

SR 3.5.1.1

Each accumulator motor operated isolation valve (8808A, B, C, and D) should be verified to be fully open every 12 hours. This verification ensures that the accumulators are available for injection and ensures timely discovery if a valve should be less than fully open. If an isolation valve is not fully open, the rate of injection to the RCS would be reduced. Although a motor operated valve position should not change with power removed, a closed valve could result in not meeting accident analyses assumptions. This Frequency is considered reasonable in view of other administrative controls that ensure a mispositioned isolation valve is unlikely.

SR 3.5.1.2 and SR 3.5.1.3

Every 12 hours, borated water volume and nitrogen cover pressure are verified for each accumulator. This Frequency is sufficient to ensure adequate injection during a LOCA. Because of the static design of the accumulator, a 12 hour Frequency usually allows the operator to identify changes before limits are reached. Operating experience has shown this Frequency to be appropriate for early detection and correction of off normal trends.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.1.4

The boron concentration should be verified to be within required limits for each accumulator every 31 days since the static design of the accumulators limits the ways in which the concentration can be changed. The 31 day Frequency is adequate to identify changes that could occur from mechanisms such as in-leakage. Sampling the affected accumulator within 6 hours after a solution volume increase of 5.6% (101 gallon) narrow range indicated level will identify whether in-leakage has caused a reduction in boron concentration to below the required limit. It is not necessary to verify boron concentration if the added water inventory is from the refueling water storage tank (RWST), and the RWST has not been diluted since verifying that its boron concentration satisfies SR 3.5.4.3, because the water contained in the RWST is nominally within the accumulator boron concentration requirements as verified by SR 3.5.4.3. This is consistent with the recommendation of GL 93-05 (Ref. 4).

SR 3.5.1.5

Verification every 31 days that power is removed from each accumulator isolation valve operator (8808A, B, C, and D) when the RCS pressure is greater than 1000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor operated isolation valve. If this were to occur, only two accumulators would be available for injection given a single failure coincident with a LOCA. Since power is removed under administrative control, the 31 day Frequency will provide adequate assurance that power is removed.

This SR allows power to be supplied to the motor operated isolation valves when RCS pressure is less than or equal to 1000 psig, thus allowing the valves to be closed to enable plant shutdown without discharging the accumulators into the RCS.

REFERENCES

1. FSAR, Chapter 6.
2. 10CFR 50.46.
3. FSAR, Chapter 15.
4. GL 93-05, Item 7.1.
5. DCM S-38A.
6. License Amendment 147/147, May 3, 2001.
7. WCAP-15049-A, Rev 1, April, 1999.