



**Pacific Gas and
Electric Company®**

James R. Becker
Site Vice President

Diablo Canyon Power Plant
Mail Code 104/5/601
P. O. Box 56
Avila Beach, CA 93424

July 29, 2011

PG&E Letter DCL-11-088

805.545.3462
Internal: 691.3462
Fax: 805.545.6445

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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Power Plant Units 1 and 2
2010 Annual Commitment Change Summary Report

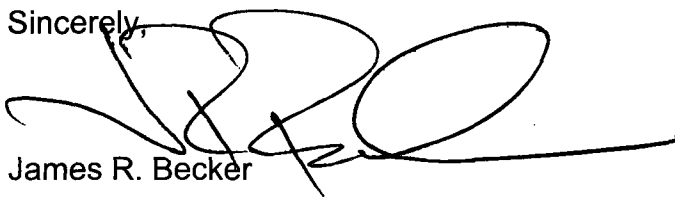
Dear Commissioners and Staff:

In accordance with NEI 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," endorsed by the NRC in SECY-00-0045, Pacific Gas and Electric Company (PG&E) is submitting the enclosed Commitment Change Summary Report for Diablo Canyon Power Plant, Units 1 and 2. The report provides a summary of the regulatory commitment changes that were considered by NEI 99-04 to require notification and occurred during the period January 1, 2010, through December 31, 2010. The summary for each change includes identification of the source document(s), a description of the original and revised commitments, and a justification for the change.

The regulatory commitment changes described in the report were processed in accordance with the NEI guideline, and were determined not to require prior NRC approval. The report does not include commitment changes that are contained in 10 CFR 50.59 evaluation summary reports, or in other submittals previously transmitted to the NRC.

PG&E makes no regulatory commitments (as defined by NEI 99-04) in this letter.

Sincerely,



James R. Becker

ssz/64018345

Enclosure

cc: Elmo E. Collins, Regional Administrator, NRC Region IV
Michael S. Peck, NRC Senior Resident Inspector
James T. Polickoski, NRR Project Manager
Alan B. Wang, NRC Project Manager

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • San Onofre • South Texas Project • Wolf Creek

A001
NRK

**SUMMARY OF REGULATORY COMMITMENT CHANGES
JANUARY 1, 2010, THROUGH DECEMBER 31, 2010**

CONTENTS

<u>Items</u>	<u>Commitment Subject</u>
1.0	Mid-Loop Operations – Loss of Residual Heat Removal
2.0	Load Transient Bypass Signal Guidance for Operators
3.0	Sump Screen Size
4.0	Sump Inspection Following Refueling
5.0	Sump Screen Inspections

1.0 Mid-Loop Operations – Loss of Residual Heat Removal

Source Document(s)

PG&E Letter DCL 89-005
PG&E Letter DCL 92-069
PG&E Letter DCL 93-166
NRC Generic Letter 88-17

Original Commitment T32860 (partial)

3. When the head is on the Reactor Vessel with the Thermocouple Conoseals Installed and the RVRLIS vent system routed to the plant vent, pressure differences may be created between the gas spaces in the pressurizer and the reactor vessel head area which could cause discrepancies between WR and NR RVRLIS indications. The RVRLIS vent system will normally be isolated from the plant vent and will only be placed in service by direction of the Shift Forman (SFM).

Revised Commitment

3. When the reactor head is on the reactor vessel with the Thermocouple conoseals installed and the reactor vessel refueling level indication system (RVRLIS) vent system routed to the plant vent, pressure differences may be created between the gas spaces in the pressurizer and the reactor vessel head area which could cause discrepancies between wide-range and narrow-range RVRLIS indications. The RVRLIS vent system will normally be isolated from the plant vent and will only be placed in service by direction of the Shift Foreman **in accordance with plant procedures.**

Justification for Change

Plant operators are expected to perform plant operations in accordance with plant procedures. Deviation from approved procedures is contrary to operations standards (reference Plant Procedure OP1.DC10). Diablo Canyon Power Plant (DCPP) expectation is that the SFM direct the procedure that will ensure reliable indication. By procedurally relying on place-in-service guidance, DCPP can ensure that two level indications are aligned and relied upon only after proper alignment has been established. By specifying which level indications are to be used based on plant configuration, the intent of the commitment is assured.

2.0 Load Transient Bypass Signal Guidance for Operators

Source Document(s)

Licensee Event Report 1-96-008-00
PG&E Letter DCL 96-144
Root Cause N0001988

Original Commitment T35511

Operating Procedures OP AP-2, AP-15, and AP-25 have been revised to provide additional guidance to operators to accommodate a "bumpless" reset of an LTB (Load Transient Bypass) signal.

Revised Commitment

Commitment deleted.

Justification for Change

The LTB signal has been eliminated from both Units 1 and 2 by a formal design change.

LTB elimination has improved plant response to a major load transient. Major LTB flow perturbations caused by automatically bypassing the polishers and the feedwater heaters no longer occur. Additionally, upgrades of the feedwater control system provide other improvements in management of major plant transients.

While some steps remain in the procedures to stabilize secondary systems following a major load transient, the actions are considered routine and are not likely to result in feedwater flow swings resulting in total loss of feedwater. The change did not warrant maintaining the commitment.

3.0 Sump Screen Size

Source Document(s)

PG&E Letter DCL 89-321
LER 89-014-00
PG&E Letter DCL 90-018
LER 89-014-01
Root Cause N0001253
PG&E Letter DCL 90-070

Original Commitment T32670 (partial)

Surveillance Test Procedure STP M-45 for containment inspections was revised to assure additional attention is given to the recirculation sump cleanliness. The procedure also includes a detailed inspection of the screens to look for gaps **>3/16** inch. Also, the revised STP M-45 for containment inspections includes inspections of the sump screens for gaps. (DCL 90-018)

Revised Commitment

Surveillance Test Procedure STP M-45 for containment inspections was revised to assure additional attention is given to the recirculation sump cleanliness. The procedure also includes a detail inspection of the screens to look for gaps **greater than 1/8** inch. Also, the revised STP M-45 for containment inspections includes inspections of the sump screens for gaps. (DCL 90-018)

Justification for Change

The DCP containment sump was redesigned per Design Change Package (DCP) C-49857. The 1/8-inch minimum opening in the emergency core cooling system flowpath was determined to be in the Charging and Safety Injection throttle/runout valves. This change conservatively identifies this minimum as a requirement for the containment sump inspection.

4.0 Sump Inspection Following Refueling

Source Document(s)

PG&E DCL 81-302
License Amendment 118/116
Root Cause N0002152

Original Commitment T04781 (partial)

Containment inspection-following refueling...

The inspection of the containment recirculation sump and RHR pump suction piping to valves 8982A and 8982B {shall be} conducted by representatives of the engineering department and verified by personnel with knowledge equal to that of the performer. **The containment recirculation sump, the sump trash racks, screens, and RHR pump suction lines {shall be} inspected for debris.** Any debris {shall be} removed from containment and recorded on the inspection sheet. This inspection {shall be} conducted at least once per 24 months, normally in conjunction with the inspection following refueling outages.

Revised Commitment

Containment inspection-following refueling...

The inspection of the containment recirculation sump and RHR pump suction piping to Valves 8982A and 8982B {shall be} conducted by representatives of the engineering department and verified by personnel with knowledge equal to that of the performer. **Sump plenum internals and RHR pump suction lines to Valves 8982A and 8982B will only be inspected if a plenum hatch seal is broken or if an initiating event as defined in Surveillance Test Procedure STP M-45A has occurred.** Any debris {shall be} removed from containment and recorded on the inspection sheet. This inspection {shall be} conducted at least once per 24 months, normally in conjunction with the inspection following refueling outages.

Justification for Change

The containment sump was redesigned per DCP C-49857. The sump plenum is now a closed system; therefore, there is no need to inspect the sump plenum internals or the RHR suction lines for debris unless specific conditions warrant it. These conditions are (1) a plenum hatch seal is broken, and (2) an initiating event has occurred.

5.0 Sump Screen Inspections

Source Document(s)

PG&E Letter DCL 89-321
LER 89-014-00
PG&E Letter DCL 90-018
LER 89-014-01
Root Cause N0001253
PG&E Letter DCL 90-070

Original Commitment T32670 (partial)

Sump cleanliness & screen inspection for gaps...

3. Surveillance Test Procedure (STP) M-45A, "Containment Inspection Prior to Establishing Containment Integrity," was revised to assure special attention to be given to sump cleanliness. The revised procedure includes inspection of the sump screens for gaps, structural distress, and corrosion, **as well as inspections of the sump and RHR suction lines for Debris (DCL 90-070).**

Revised Commitment

Sump cleanliness & screen inspection for gaps...

3. Surveillance Test Procedure (STP) M-45A, "Containment Inspection Prior to Establishing Containment Integrity," was revised to assure special attention to be given to sump cleanliness. The revised procedure includes inspection of the sump screens for gaps, structural distress, and corrosion. **Sump plenum internals and RHR pump suction lines will only be inspected if a plenum hatch seal is broken or if an initiating event as defined in STP M-45A has occurred.**

Justification for Change

The containment sump was redesigned per DCP C-49857. The sump plenum is now a closed system; therefore, there is no need to inspect the sump plenum internals or the RHR suction lines for debris unless specific conditions warrant it. These conditions are (1) a plenum hatch seal is broken, and (2) an initiating event has occurred.

COMMITMENT TRACKING MEMO

(Remove prior to NRC submittal)

Document: PG&E Letter DCL-11-088
Subject: Commitment Change Summary Report
File Location: S:\RS\CLERICAL\DCLs - Draft\DCL-11-088.doc

FSAR Update Review	
Utilizing the guidance in XI3.ID2, does the FSAR Update need to be revised?	Yes
<input type="checkbox"/> No <input checked="" type="checkbox"/>	
<i>If "Yes", submit an FSAR Update Change Request in accordance with XI3.ID2 (or if this is an LAR, process in accordance with WG-9)</i>	

Commitment # 1

There are no new or changed commitments in this letter.

Clarification: None