



**Pacific Gas and
Electric Company®**

Barry S. Allen
Site Vice President

Diablo Canyon Power Plant
Mail Code 104/6
P. O. Box 56
Avila Beach, CA 93424

805.545.4888
Internal: 691.4888
Fax: 805.545.6445

January 29, 2014

PG&E Letter DCL-14-007

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

10 CFR 50.54(f)

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

Response to December 23, 2013, Request for Additional Information Associated
with Near-Term Task Force Recommendation 2.3 Flooding Walkdowns

References:

1. NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012
2. PG&E Letter DCL-12-059, "Pacific Gas and Electric Company's Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendations 2.1 and 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated June 7, 2012
3. PG&E Letter DCL-12-114, "Final Response to Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.3 Flooding," dated November 27, 2012

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) staff issued Reference 1 to Pacific Gas and Electric Company (PG&E) requesting information per Title 10 of the Code of Federal Regulations, Section 50.54(f). Reference 1 requested that licensees conduct flooding hazard walkdowns to verify the plant configuration is within their current licensing basis. Reference 2 confirmed that PG&E would use Nuclear Energy Institute Guidance 12-06, as endorsed by NRC Letter, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," dated May 31, 2012.



Reference 3 provided PG&E's response to Recommendation 2.3 flooding for Diablo Canyon Power Plant Units 1 and 2.

On December 23, 2013, the NRC staff issued a request for additional information (RAI) associated with Near-Term Task Force Recommendation 2.3 flooding.

Enclosed is PG&E's response to the December 23, 2013, RAIs.

PG&E is making no new regulatory commitments. This letter includes no revisions to existing regulatory commitments.

If you have any questions, or require additional information, please contact Mr. Patrick Nugent at (805) 781-9786.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 29, 2014.

Sincerely,

Barry S. Allen
Site Vice President

dmfn/SAPN 50601134

Enclosure

cc: Diablo Distribution
cc:/enc: Brian J. Benney, NRR Project Manager
Marc L. Dapas, NRC Region IV Administrator
Thomas R. Hipschman, NRC, Senior Resident Inspector
Eric J. Leeds, NRC/NRR Director

**Pacific Gas and Electric Company's Response to Request for Additional
Information Associated with Near-Term Task Force Recommendation 2.3:
Flooding**

RAI-1

Confirmation that the process for evaluating APM was reviewed

PG&E Response to RAI-1

PG&E confirms that the process for evaluating available physical margin (APM) was reviewed as requested by this request for additional information (RAI).

RAI-2

Confirmation that the APM process is now or was always consistent with the guidance in NEI 12-07 and discussed in this RAI

PG&E Response to RAI-2

PG&E confirms that the APM process was always consistent with the guidance in NEI 12-07. Documentation from the initial Recommendation 2.3 flooding walkdowns was enhanced to provide clarification to show conformance with the APM process discussed in this RAI.

RAI-3

If changes are necessary, a general description of any process changes to establish this consistency

PG&E Response to RAI-3

PG&E determined that there are no process changes necessary to establish consistency between NEI 12-07 and this RAI with previously submitted information.

RAI-4

As a result of the audits and subsequent interactions with industry during public meetings, NRC staff recognized that evaluation of APM for seals (e.g. flood doors, penetrations, flood gates, etc.) was challenging for some licensees. Generally, licensees were expected to use either Approach A or Approach B (described below) to determine the APM for seals:

- a) If seal pressure ratings were known, the seal ratings were used to determine APM (similar to example 2 in Section 3.13 of NEI 12-07). A numerical value for*

APM was documented. No further action was performed if the APM value was greater than the pre-established small margin threshold value. If the APM value was small, an assessment of "significant consequences" was performed and the guidance in NEI 12-07 Section 5.8 was followed.

- b) If the seal pressure rating was not known, the APM for seals in a flood barrier is assumed to be greater than the pre-established small-margin threshold value if the following conditions were met: (1) the APM for the barrier in which the seal is located is greater than the small-margin threshold value and there is evidence that the seals were designed/procured, installed, and controlled as flooding seals in accordance with the flooding licensing basis. Note that in order to determine that the seal has been controlled as a flooding seal, it was only necessary to determine that the seal configuration has been governed by the plant's design control process since installation. In this case, the APM for the seal could have been documented as "not small".*

As part of the RAI response, state if either Approach A or Approach B was used as part of the initial walkdowns or as part of actions taken in response to this RAI. No additional actions are necessary if either Approach A or B was used.

If neither Approach A or B was used to determine the APM values for seals (either as part of the walkdowns or as part of the actions taken in response to this RAI), then perform the following two actions:

- Enter the condition into the CAP (note: it is acceptable to utilize a single CAP entry to capture this issue for multiple seals). CAP disposition of "undetermined" APM values for seals should consider the guidance provided in NEI 12-07, Section 5.8. The CAP disposition should confirm all seals can perform their intended safety function against floods up to the current licensing basis flood height. Disposition may occur as part of the Integrated Assessment. If an Integrated Assessment is not performed, determine whether there are significant consequences associated with exceeding the capacity of the seals and take interim action(s), if necessary, via the CAP processes. These actions do not need to be completed prior to the the RAI response.*
- Report the APM as "undetermined" and provide the CAP reference in the RAI response.*

PG&E Response to RAI-4

PG&E used both Approaches A and B for determining the APM for all seals. If the seal pressure ratings were known, the seal ratings were used to determine the APM, as discussed in Approach A. For cases in which the seal pressure rating was not known, Approach B was used. As discussed in the response to RAI-2 above, documentation from the initial 2.3 flooding walkdowns was enhanced to provide clarification to show conformance with the APM process discussed in this RAI.