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PG&E Letter DCL-14-030

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

10 CFR 50.59

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Report of 10 CFR 50.59, "Changes, Tests, and Experiments," for the Period of
January 1, 2012, through December 31, 2013

Dear Commissioners and Staff:

Pursuant to 10 CFR 50.59, "Changes, tests, and experiments," Pacific Gas and Electric Company (PG&E) is enclosing the 10 CFR 50.59 Report for Diablo Canyon Power Plant, Units 1 and 2, for the period of January 1, 2012, through December 31, 2013. In accordance with 10 CFR 50.59(d)(2), the Enclosure provides a summary of all changes, tests, and experiments performed during this period.

Evaluations performed in accordance with 10 CFR 50.59 are performed as part of PG&E's licensing basis impact evaluation (LBIE) process. Since the LBIE process is used to perform reviews for compliance with regulations in addition to 10 CFR 50.59, some LBIEs do not include a 10 CFR 50.59 evaluation and, therefore are not included in this report.

The Plant Staff Review Committee has reviewed the referenced LBIEs and has concurred with the determination regarding NRC approval as specified in the summaries.

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

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

Sincerely,

Barry S. Allen



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April 17, 2014
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Enclosure

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**REPORT OF 10 CFR 50.59, "CHANGES, TESTS, AND EXPERIMENTS,"
for the Period of
January 1, 2012, through December 31, 2013**

Pacific Gas and Electric Company
Diablo Canyon Power Plant, Units 1 and 2
Docket Nos. 50-275 and 50-323

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12-001 Align ABVS for Flow Test	
Reference Document No.:	TP TB-12001
Reference Document Title:	Align ABVS for Flow Test
Activity Description:	
<p>This evaluation involves a proposed test that will be performed to align the auxiliary building ventilation system (ABVS) for measuring air flow in the emergency core cooling system (ECCS) pump rooms with the ABVS supply fans turned off. An operator shall be designated to restore the fans in the event of an accident requiring the ABVS.</p> <p>The fans will be manually started within one hour of any accident requiring ECCS pumps. This test will allow a licensing determination to be assessed on whether the ABVS supply fans are needed as part of the current licensing bases.</p>	
Summary of Evaluation:	
<p>The licensing basis impact evaluation (LBIE) evaluated the following adverse conditions:</p> <ol style="list-style-type: none">1. The supply fans will require manual starting instead of automatic starting on an engineered safety features signal or when an ECCS pump is started.2. The reference bound temperature limit in the auxiliary building may be exceeded during the test. <p>Evaluation Conclusions:</p> <ul style="list-style-type: none">• The proposed activity will not cause a minimal increase in the occurrence of an accident because the ABVS is not an accident initiator.• The manual action to start the supply fan and the possibility of exceeding the reference bound temperature limit will not result in more than a minimal increase in the likelihood of a malfunction.• The proposed activity will not result in the consequence of an accident previously evaluated because there is no accident associated with this activity.• The proposed activity will not result in an increase of a malfunction previously evaluated because the charcoal filters in the ABVS exhaust system remain operable.• The proposed activity will not create the possibility of a different accident. The	

ABVS cannot create an accident and any new accidents that may be created are bounded by the accidents already evaluated.

- The proposed activity will not create a malfunction with a different result. The result of any malfunction that may be created will be the same as the results of those previously evaluated.
- The proposed activity will not result in a design basis limit for a fission product barrier (DBLFPB) being exceeded or altered because the activity does not directly or indirectly involve a DBLFPB.
- The proposed activity does not involve a methodology change.

The activity to turn off the supply fans to take air flow measurements in the ECCS pump rooms was evaluated in accordance with the requirements of 10 CFR 50.59 and 10 CFR 72.48, and concluded that the performance of this test does not require prior NRC approval.

12-006 Relocate Intake Crane	
Reference Document No.:	DDP 1000024850
Reference Document Title:	Relocate Intake Crane
Activity Description:	
<p>The anchored location for the intake facility gantry crane is being moved from its current craneway position at the north end to a location approximately 20 feet toward the south due to security-related modifications at the intake facility.</p> <p>The existing anchor configuration is modified by lengthening the tie down that ties each crane leg to the north end. The sole function of the anchorage is to resist motion (rolling/sliding) of the crane to the south due to wind velocities approximately 110 mph - this function is unchanged.</p>	
Summary of Evaluation:	
<p>The existing anchored location provides 100 feet of separation between the crane and the nearest safety related equipment. The seismic qualification of the intake structure to support the crane and stability against overturning during a seismic event have been evaluated for the new anchored location by reviewing applicable calculations, and are unaffected by the change. The stability of the anchored crane for wave effects (e.g., tsunami) has been evaluated and is the same for any location along the craneway: the crane will roll/slide to the north if frictional forces are overcome and to the south if the tie down fails, but will remain on the craneway until reaching the end. At that point, the crane may overturn and would fall outside of the intake structure with no resulting damage to safety related components.</p> <p>The behavior of the crane in a tornado is also unaffected by the change: the crane will roll/slide as described above or, at wind velocities above 110 mph. is susceptible to overturning at its anchored location. At the new anchored location, separation distance from safety-related components is adequate such that the potential for damage to components important to safety remains extremely unlikely.</p> <p>Therefore, for the proposed activity, there is no more than a minimal increase in frequency of accidents; likelihood of malfunctions of structures, systems, and components (SSCs) important to safety or their consequences; no accidents of a different type or malfunctions of SSCs important to safety with a different result are created; and no design basis limits for fission product barriers nor methods of evaluation used in establishing the design bases or safety analyses as described in the Updated Final Safety Analysis Report (UFSAR) are involved. Based on this, prior NRC approval is not required for this activity.</p>	

12-007 Unit 2 Polar Crane Modification	
Reference Document No.:	DDP 1000024811
Reference Document Title:	Unit 2 Polar Crane Modification
Activity Description:	
<p>The associated design change involved modifications to the Unit 2 polar crane drive system. As a result, the following areas were impacted:</p> <ul style="list-style-type: none">• The seismic analysis of the Unit 2 polar crane is updated using an ANSR model to address cumulative weight changes resulting from the "1982 modifications" through completion of this design change package.• Impact on heat removal capability/post-accident pressure due to decrease of containment free volume.• Impact on heat removal capability due to increase in containment heat sink.• Increase of post-accident combustibles gas inside of containment due to increase of zinc and aluminum amount inside containment.• Potential impact on containment recirculation sump flow path and introduction of additional debris.	
Summary of Evaluation:	
<p>The 10 CFR 50.59 evaluations were performed on the following proposed activities:</p> <ol style="list-style-type: none">1. the addition of weight to the polar crane resulting in increased seismic response forces and moments and higher critical member stresses2. the addition of weight to the polar crane resulting in increased seismic response displacements causing higher wheel lift and reduced seismic gap between the polar crane & containment3. Use of a personal computer (PC) based computer program of the ANSR model in lieu of the original mainframe ANSR-1 computer model for performing the seismic analysis of the polar crane4. Use of a later version of the SAP computer program (SAP 2000) for generating modal properties, extracting frequencies and participation factors for the polar crane seismic analysis in lieu of the original SAP IV computer program	

The 10 CFR 50.59 evaluation concluded the following:

- The proposed activities do not result in more than a minimal increase in the frequency of occurrence or consequences of an accident since load drop analysis is unaffected.
- The proposed activities do not create a possibility for an accident of a different type since the weight addition activities and their effects on the polar crane do not change the polar crane's functions, failure modes, or create the possibility of any new interactions with safety related structures, systems and components which could initiate any new accidents.
- The proposed activities do not result in more than a minimal increase in the likelihood of occurrence or consequences of a malfunction since results of overstress and failure of the polar crane critical members for both the existing and modified condition remain the same.
- The proposed activities do not result in a design basis limit for a fission product barrier, as described in the Updated Final Safety Analysis Report, being exceeded or altered since the proposed polar crane weight addition activities do not have any discernable effects on the fuel cladding design criteria, reactor coolant system pressure boundary, or the containment pressure.
- The proposed activities do not result in a departure from any described method of evaluation since benchmarking of the PC-based ANSR model provides results that are essentially the same within margin of error. Based on the negative responses in this Evaluation, prior NRC approval is not required to implement this change.

12-009 Class 1E Battery, Battery Qualification	
Reference Document No.:	UFSAR Sections 3.10, & 8.3
Reference Document Title:	Class 1E Battery, Battery Qualification
Activity Description:	
<p>This licensing basis impact evaluation provides evaluation of changes to the Updated Final Safety Analysis Report (UFSAR) Section 3.10.2.8.1, which adds a statement and references that battery qualification was performed using the guidance of IEEE535-1986 (in 2008 UFSAR rev 18) and NRC Regulatory Guide (RG) 1.158.</p>	
Summary of Evaluation:	
<p>Supplement to Safety Evaluation Report (SSER) 9 (JUN80) and SSER 13 (APR81) cited that battery qualification was performed per IEEE535-1979. In 1992, new batteries were installed. The UFSAR was updated in Revision 12, when all Class 1E batteries were replaced. The Class 1E batteries installed in 1992 were qualified per IEEE535-1986, as documented in the 1992 seismic calculation file. Reference to this standard was not documented until UFSAR Revision 18 in 2008. This is an adverse change that needs evaluation because IEEE535-1979 was utilized as the evaluation basis in the subject SSERs. The evaluation found that the IEEE535-1986 changes in test conditions were conservative.</p> <p>The NRC published RG 1.158, "Qualification of Safety-Related Lead Acid Storage Batteries for Nuclear Power Plants," in February 1989, which endorsed IEEE535-1986 in its entirety. The Implementation section states that it applies to "All operating nuclear power plants that replace batteries." The Impact statement states, "Also, the staff has concluded that there is no significant difference between the 1979 and 1986 versions with respect to the pre-aging part of the qualification testing."</p> <p>Therefore, the requested UFSAR changes to add RG 1.158 and IEEE535-1986 (in 2008 UFSAR Rev 18) do not constitute a departure from the methods of evaluation used in the safety analyses of the subject SSERs because the differences between IEEE535-1979 and IEEE535-1986 are conservative. In addition, the IEEE535-1986 for battery qualification is the NRC endorsed methodology in RG 1.158.</p> <p>Based on this, prior NRC approval is not required for this activity.</p>	

12-010 PCS Replacement Sequencing	
Reference Document No.:	TB 12002
Reference Document Title:	PCS Replacement Sequencing
Activity Description:	
<p>The process control system (PCS) instrument channels will be removed from service in Modes 5 and 6, and defueled to support replacement of the PCS. After the channels are removed from service, selected PCS instrument channels will be reconfigured into a temporary configuration to provide control room indication functions.</p> <p>The temporary indication channels will only be in place until they are reconfigured to their newly approved permanent configuration, tested, and returned to service. Temporary control room indications are being provided to monitor inservice systems or equipment, or support surveillance/testing activities because the normal instrument functions will not be available when the PCS is removed from service for replacement.</p>	
Summary of Evaluation:	
<p>This activity involves the temporary alteration of instrument channels described in the Updated Final Safety Analysis Report (UFSAR). The temporary alterations are necessary to support refueling operations, equipment monitoring, and surveillance requirements during a time when the permanent instrumentation will be removed and replaced by an approved design change. The temporary alterations support the applicable UFSAR design functions, and the performance of design functions, for plant Modes 5, 6, and defueled.</p> <p>The evaluation concluded the following:</p> <ul style="list-style-type: none">• The temporary alterations do not create or impact accident initiators and therefore do not result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the UFSAR.• The temporary alterations do not create or impact malfunctions and therefore do not result in more than a minimal increase in the likelihood of occurrence of a malfunction previously evaluated in the UFSAR.• There are no accidents or evaluations of radiological consequences in the UFSAR associated with these instruments. Therefore, the temporary alterations do not result in more than a minimal increase in the consequences of an accident previously evaluated in the UFSAR.	

- There are no malfunctions or evaluations of radiological consequences in the UFSAR associated with these instruments. Therefore, the temporary alterations do not result in more than a minimal increase in the consequences of a malfunction of a structure, system, and component (SSC) important to safety previously evaluated in the UFSAR.
- This activity does not create any new accident initiators or SSC failure modes. Therefore, the temporary alterations do not create a possibility of an accident of a different type than any previously evaluated in the UFSAR.
- This activity does not create any new malfunction initiators and cannot result in the loss of mitigation functions associated with malfunctions. Therefore, the temporary alterations do not create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the UFSAR.
- This activity does not involve a fission product barrier. Therefore, the temporary alterations do not result in a design basis limit for a fission product barrier as described in the UFSAR being exceeded or altered.
- The temporary alterations do not involve a method of evaluation.

Based on this, prior NRC approval is not required for this activity.

12-013 Replace Unit 2 Westinghouse 7100 Process Control System	
Reference Document No.:	DDP 1000000501
Reference Document Title:	Replace Unit 2 Westinghouse 7100 Process Control System
Activity Description:	
<p>The process control system (PCS) converts plant parameters such as temperature, pressure, level, and flow into electrical signals. The electrical signals then undergo signal conditioning, processing, and setpoint measurement. Equipment control signals are generated to operate system equipment such as pumps, valves and heaters. System indications are provided in the main control room, hot shutdown panel and plant process computer. Alarm input signals are provided to the main annunciator system.</p> <p>The original Westinghouse 7100 PCS has become obsolete and difficult to maintain. Design Change Package 1000000501 replaces the Unit 2 Westinghouse 7100 PCS equipment with a new programmable logic controller (PLC) based system that is reliable and easily maintained. The scope of the new PCS design is in accordance with the Conceptual Design Document. The design is in accordance with Functional Requirement Specifications 663195-41 and 663195-43.</p>	
Summary of Evaluation:	
<p>The 10 CFR 50.59 evaluation concluded the following:</p> <ul style="list-style-type: none"> • Based on the evaluation including a qualitative assessment and failure modes and effects analysis (FMEA) performed for the design change, the design change does not more than minimally increase the frequency of an accident previously evaluated in the Updates Final Safety Analysis Report (UFSAR). • Based on the evaluation including a qualitative assessment and FMEA performed for the design change, the design change does not more than minimally increase the likelihood of a malfunction of an structure, system, and component (SSC) important to safety previously evaluated in the UFSAR. • The evaluation concludes that replacing the PCS does not alter the performance of systems used to mitigate the consequences (dose) of an accident. Therefore, the design change does not result in more than a minimal increase in the consequences of an accident previously evaluated in the UFSAR. • The evaluation concludes that replacing the PCS will not result in a malfunction of 	

SSCs used to mitigate the consequences (dose) of an accident. Therefore, the design change does not result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the UFSAR.

- The evaluation concludes that all PCS accident initiators are bounded by the accidents previously evaluated in the UFSAR. Therefore, the design change does not create the possibility for an accident of a different type than any previously evaluated in the UFSAR.
- Based on the evaluation including a qualitative assessment and the FMEA performed for the design change, the design change does not create the possibility for a malfunction of an SSC important to safety with a different result than previously evaluated in the UFSAR.
- The evaluation concluded none of the systems or parameters controlled or indicated by the PCS affect a design basis limit for a fission product barrier (DBLFPB). There are no system or controlling parameter numerical values changed that were used in the UFSAR to determine the integrity of a fission product barrier. Therefore, the design change does not result in DBLFPB as described in the UFSAR being exceeded or altered.
- The evaluation concluded the design change to replace the PCS with a PLC based system does not involve a method of evaluation as defined in the UFSAR. Therefore, the design change does not result in a departure from a method of evaluation described in the UFSAR used in establishing the design basis or in the safety analysis.

Based on this, prior NRC approval is not required for this activity.

12-033 Remove Unit 1 Auxiliary Building Heating	
Reference Document No.:	DDP 1000024853 Revision 0
Reference Document Title:	Remove Unit 1 Auxiliary Building Heating
Activity Description:	
<p>The heating coils and their supporting components that are part of the auxiliary building heating, ventilating, and air conditioning (HVAC) system are being removed.</p> <p>The heating coils are not used and the coils have degraded to a point that they are falling apart and becoming a housekeeping issue. Rather than replace them and have the new ones degrade again, a design change will remove them. This will reduce the amount of debris in the auxiliary building.</p>	
Summary of Evaluation:	
<p>The activity to remove the heating coils from the auxiliary building HVAC system was evaluated in accordance with the requirements of 10 CFR 50.59 and 10 CFR 72.48 and concluded that this change does not require prior NRC approval.</p> <p>Evaluation Summary:</p> <ul style="list-style-type: none"> • The auxiliary building HVAC system is not a credible initiator of any accident evaluation in the Updated Final Safety Analysis Report (UFSAR). Therefore, removal of the heating coils does not have any impact on the frequency of occurrence of any UFSAR accident. • The heating coils do not have any physical impact on the operation or potential failures of any auxiliary building HVAC system structures, systems, and components (SSCs) important to safety as described in UFSAR Section 9.4.2. Therefore, the removal of the coils can not cause any increase in the likelihood of a malfunction of an SSC important to safety as evaluated in the UFSAR. • The heating coils do not provide any safety-related function and do not physically impact the ability of the auxiliary building HVAC system SSCs to perform their accident mitigation functions of cooling engineered safety feature components and limiting unfiltered emergency core cooling system leakage as described in UFSAR Section 9.4.2. Therefore, the removal of the heating coils does not result in any increase in the consequences of an accident evaluated in the UFSAR. • As described in UFSAR Section 9.4.2.3.9, the auxiliary building HVAC system is redundantly designed. There is no single failure of any SSC important to safety that can prevent the system from performing the required accident mitigation 	

functions and result in an increase in offsite dose consequences. The heating coils have no physical impact on any SSC malfunction. Therefore, their removal can not cause any increase in consequences associated with an SSC malfunction.

- The removal of the auxiliary building heating coils does not make previously incredible accidents credible, and the heating coils are not associated with any accidents that were previously bounded by other accidents.
- The removal of the heating coils has no impact on the single failure redundancy of the auxiliary building HVAC SSCs important to safety and therefore, cannot create any possibility for a different result associated with an SSC malfunction.
- The removal of the heating coils for the HVAC system in the auxiliary building, which have no safety-related function have no impact on the design basis limit for a fission product barrier.
- The removal of the auxiliary building heating coils does not involve a method of evaluation described in the UFSAR.

Based on this, prior NRC approval is not required for this activity.

12-034 Remove U2 Auxiliary Building Heating	
Reference Document No.:	DDP 1000000191 Revision 0
Reference Document Title:	Remove U2 Auxiliary Building Heating
Activity Description/Summary of Evaluation:	
<p>The heating coils and their supporting components that are part of the auxiliary building heating, ventilating, and air conditioning (HVAC) system are being removed.</p> <p>The heating coils are not used and the coils have degraded to a point that they are falling apart and becoming a housekeeping issue. Rather than replace them and have the new ones degrade again a design change will remove them. This will reduce the amount of debris in the Auxiliary Building.</p>	
Summary of Evaluation:	
<p>The activity to remove the heating coils from the auxiliary building HVAC system was evaluated in accordance with the requirements of 10 CFR 50.59 and 10 CFR 72.48 and concluded that this change does not require prior NRC approval.</p> <p>Evaluation Summary:</p> <ul style="list-style-type: none"> • The auxiliary building HVAC system is not a credible initiator of any accident evaluation in the Updated Final Safety Analysis Report (UFSAR). Therefore, removal of the heating coils does not have any impact on the frequency of occurrence of any UFSAR accident. • The heating coils do not have any physical impact on the operation or potential failures of any auxiliary building HVAC system structures, systems, and components (SSCs) important to safety as described in UFSAR Section 9.4.2. Therefore, the removal of the coils can not cause any increase in the likelihood of a malfunction of an SSC important to safety as evaluated in the UFSAR. • The heating coils do not provide any safety-related function and do not physically impact the ability of the auxiliary building HVAC system SSCs to perform their accident mitigation functions of cooling engineered safety feature components and limiting unfiltered emergency core cooling system leakage as described in UFSAR Section 9.4.2. Therefore, the removal of the heating coils does not result in any increase in the consequences of an accident evaluated in the UFSAR. • As described in UFSAR Section 9.4.2.3.9, the auxiliary building HVAC system is redundantly designed. There is no single failure of any SSC important to safety that can prevent the system from performing the required accident mitigation 	

functions and result in an increase in offsite dose consequences. The heating coils have no physical impact on any SSC malfunction. Therefore, their removal can not cause any increase in consequences associated with an SSC malfunction.

- The removal of the auxiliary building heating coils does not make previously incredible accidents credible, and the heating coils are not associated with any accidents that were previously bounded by other accidents.
- The removal of the heating coils has no impact on the single failure redundancy of the auxiliary building HVAC SSCs important to safety and therefore, cannot create any possibility for a different result associated with an SSC malfunction.
- The removal of the heating coils for the HVAC system in the auxiliary building, which have no safety-related function have no impact on the design basis limits for the fission product barrier.
- The removal of the auxiliary building heating coils does not involve a method of evaluation described in the UFSAR.

Based on this, prior NRC approval is not required for this activity.

12-036 PCS Replacement Sequencing	
Reference Document No.:	TB 12006
Reference Document Title:	PCS Replacement Sequencing
Activity Description:	
<p>Temporary Procedure TB-12006 provides instructions for the replacement of the process control system (PCS). The PCS instrument channels will be removed from service in Modes 5, 6, and defueled to support replacement of the PCS. After the channels are removed from service, selected PCS instrument channels will be reconfigured into a temporary configuration to provide control room indication functions. The temporary indication channels will only be in place until they are reconfigured to their newly approved permanent configuration, tested, and returned to service.</p> <p>Temporary control room indications are being provided to monitor inservice systems or equipment, or support surveillance/testing activities because the normal instrument functions will not be available when the PCS is removed from service for replacement.</p>	
Summary of Evaluation:	
<p>This activity involves the temporary alteration of instrument channels described in the Updated Final Safety Analysis Report (UFSAR). The temporary alterations are necessary to support refueling operations, equipment monitoring, and surveillance requirements during a time when the permanent instrumentation will be removed and replaced by an approved design change. The temporary alterations support the applicable UFSAR design functions, and the performance of design functions, for plant Modes 5, 6, and defueled.</p> <p>The evaluation concluded that:</p> <ul style="list-style-type: none">• The temporary alterations do not create or impact accident initiators, and therefore, do not result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the UFSAR.• The temporary alterations do not create or impact malfunctions, and therefore, do not result in more than a minimal increase in the likelihood of occurrence of a malfunction previously evaluated in the UFSAR.• There are no accidents or evaluations of radiological consequences in the UFSAR associated with these instruments. Therefore, the temporary alterations do not result in more than a minimal increase in the consequences of an accident	

previously evaluated in the UFSAR.

- There are no malfunctions or evaluations of radiological consequences in the UFSAR associated with these instruments. Therefore, the temporary alterations do not result in more than a minimal increase in the consequences of a malfunction of a structure, system, and component (SSC) important to safety previously evaluated in the UFSAR.
- This activity does not create any new accident initiators or SSC failure modes. Therefore, the temporary alterations do not create a possibility of an accident of a different type than any previously evaluated in the UFSAR.
- This activity does not create any new malfunction initiators and cannot result in the loss of mitigation functions associated with malfunctions. Therefore, the temporary alterations do not create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the UFSAR.
- This activity does not involve a fission product barrier. Therefore, the temporary alterations do not result in a design basis limit for a fission product barrier as described in the UFSAR being exceeded or altered.
- The temporary alterations do not involve a method of evaluation.

Based on this, prior NRC approval is not required for this activity.

12-037 Reactor Trip or Safety Injection, SI Termination	
Reference Document No.:	EOP E-O, EOP E-1.1
Reference Document Title:	Reactor Trip or Safety Injection, SI Termination
Activity Description/Summary of Evaluation:	
<p>This activity implemented a compensatory measure to address a non-conforming condition in the auxiliary building ventilation system (ABVS) that could allow unacceptable unfiltered emergency core cooling system leakage following a design basis large break loss-of-coolant accident (LOCA).</p> <p>This proposed activity comprises the following two emergency operating procedure (EOP) changes in order to implement this compensatory measure:</p> <ol style="list-style-type: none"> 1. Revise EOP E-O, "Reactor Trip or Safety Injection," Appendix E Step 15, to have the operators always place both the Unit 1 and Unit 2 trains of ABVS in the "Safeguards Only with an S Signal" mode of operation. 2. Revise EOP E-1.1, "SI Termination," step 29 to restore the ABVS operation back to "Normal" if it is no longer required for post-accident recovery. 	
Summary of Evaluation:	
<p>The evaluation concluded that:</p> <ul style="list-style-type: none"> • The proposed activity is not physically related to the cause of any accident and does not introduce the possibility of a change in the frequency of an accident previously evaluated in the Updated Final Safety Analysis Report (UFSAR). • There has been no change in the ABVS operation in the "Safeguards Only" mode of operation such that all ABVS structures, systems, and components (SSCs) will continue to perform in the same manner as described in the UFSAR. The compensatory measure has been acceptably evaluated per NEI 96-07 guidance for crediting manual operator actions and has been validated and incorporated into the Time Critical Operator Action (TCOA) database as new TCOA 65. Therefore, the proposed activity does not result in more than a minimal increase in the likelihood of occurrence of a malfunction of an SSC important to safety previously evaluated in the UFSAR. • The degraded conditions are the explicit source of impact on the post-LOCA calculated offsite doses and control room doses in UFSAR Section 15.5. The compensatory measure reduces the post-LOCA dose effects of these 	

non-conforming conditions. This compensatory measure itself (not the degraded condition) is reviewed per 10 CFR 50.59 to evaluate any potential adverse impact on any other aspects of the facility as described in the plant design or licensing basis. Therefore, this proposed activity does not result in more than a minimal increase in the consequences of an accident previously evaluated in the UFSAR.

- The proposed activity does not alter or place any ABVS SSC in a configuration outside design or analysis limits. Therefore, there is no impact on any SSC failure modes and the calculated post-LOCA offsite doses and control room doses in Section 15.5 remain bounding and are not impacted. Therefore, the proposed activity does not result in an increase in the consequence of a malfunction of an SSC important to safety previously evaluated in the UFSAR.
- The proposed activity does not alter or place any ABVS SSC in a configuration outside design or analysis limits and does not create any new accident scenarios. The proposed activity does not create a possibility for an accident of a different type than previously evaluated in the UFSAR.
- The ABVS SSCs important to safety will continue to perform their design function as described in the safety analysis and will continue to operate within design and analysis limits such that no new system interactions or new equipment failure modes have been created. The proposed activity does not create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the UFSAR.
- The compensatory measure supports the prompt operability assessment to establish that control room envelope (CRE) operability with the degraded condition based on meeting the applicable General Design Criteria 19 control room dose acceptance criteria as described in the UFSAR. All evaluations have been performed with respect to these current UFSAR design basis limits and no changes to any limits are required to establish CRE operability. Therefore, this proposed activity does not result in a design basis limit for a fission product barrier as described in the UFSAR being altered or exceeded.
- The proposed activity does not adversely revise or replace an UFSAR described methodology. Therefore, this 50.59 question is not applicable for this proposed activity.

Based on this, prior NRC approval is not required for this activity.

12-038 U1 SI Test Header Phase II Project	
Reference Document No.:	DDP 1000000337
Reference Document Title:	U1 SI Test Header Phase II Project
Activity Description/Summary of Evaluation:	
Design Change Package 1000000337 makes changes to the Unit 1 safety injection system piping and valve network that is used for performing reactor coolant system pressure isolation valve and emergency core cooling system check valve leak tests. This safety injection check valve test header is located primarily inside containment.	
Summary of Evaluation:	
<p>The evaluation concluded that:</p> <ul style="list-style-type: none">• A review of the Updated Final Safety Analysis Report (UFSAR) described accidents related to this activity determined that this change does not result in a more than minimal increase in the frequency of occurrence of an accident previously evaluated in the UFSAR.• A review of the UFSAR described malfunctions related to this activity determined the change does not result in a more than minimal increase in the likelihood of occurrence of a malfunction of an structure, system, and component (SSC) important to safety previously evaluated in the UFSAR.• A review of the UFSAR described accidents related to this activity determined that this change does not result in a more than minimal increase in the consequences of an accident previously evaluated in the UFSAR.• A review of the UFSAR described malfunctions related to this activity determined that this change does not result in a more than minimal increase in the consequences of a malfunction of an SSC previously evaluated in the UFSAR.• The proposed activity does not create a new or different type of accident.• There are no new or existing malfunctions with different results than previously evaluated in the UFSAR.• The proposed activity does not result in any design basis limit for a fission product barrier as described in the UFSAR, being exceeded or altered.'• The activity does not involve any changes to any method of evaluation. <p>Based on this, prior NRC approval is not required for this activity.</p>	

12-039 UFSAR Change 3.8.1.4.6.2	
Reference Document No.:	SAPN 50365058
Reference Document Title:	UFSAR Change 3.8.1.4.6.2
Activity Description/Summary of Evaluation:	
<p>The finite element computer program referenced in Updated Final Safety Analysis Report (UFSAR) Section 3.8.1.4.6.2 for the seismic analysis of the Unit 2 annulus structure (GT STRUDL) is being supplemented to reference another computer program (SAP2000).</p> <p>The installation of the replacement recirculation sump strainers in the Unit 2 Containment Sump DCP C-50857, (response to Generic Letter 2004-02) required relocation of a structural steel brace associated with the containment annulus structure framing (brace between elevation 101 ft and 91 ft, originally located inside the recirculation sump, between frame Nos. 5 and 6, relocated to be between frame Nos. 2 and 3). The calculations prepared in support of the brace relocation deviated from the UFSAR in the following aspect:</p> <ul style="list-style-type: none">• The computer program SAP2000 was used instead of the computer program referenced in UFSAR Section 3.8.1.4.6.2 (GT STRUDL). <p>The version of GT STRUDL computer program used on the original analysis resided on an old mainframe server and is now obsolete. The program was not available to be run and thus the newer personal computer based program SAP2000 was benchmarked and used.</p> <p>The analysis methodology described in the UFSAR is unchanged. Equivalent static-type methodology is still utilized. However, the change from GT STRUDL to SAP2000 is a change to an element of that methodology.</p> <p>The UFSAR changes included with DCP C-50857 did not include a change to this UFSAR section and the licensing basis impact evaluation.</p> <p>The screen for the DCP did not address the change in the computer program. Therefore, an additional UFSAR Change is required to correct this error in the DCP.</p>	
Summary of Evaluation:	
<p>Prior NRC approval is NOT required because this constitutes a change to an element of a method of evaluation (the use of SAP2000 in lieu of GT STRUDL), which produces results that are essentially the same. Per NEI 96-07 Section 4.3.8.1, this does not constitute a departure from a method that requires prior NRC approval.</p>	

13-007 Alternate CAISO Metering for Unit 2 CCVTs	
Reference Document No.:	SAPN 50536645
Reference Document Title:	Alternate CAISO Metering for Unit 2 CCVTs
<p>Activity Description/Summary of Evaluation:</p> <p>The proposed activity is to install an instrument/meter to provide real time Unit 2 net megawatt/mega volts amp reactive output to the California Independent System Operator (CAISO). This CAISO meter will be installed in the 500 kV switchyard. The change being evaluated is the connection of the CAISO metering device to the Unit 2 500 kV output breaker current transformer (CT) and tie-line capacitive coupled voltage transformers (CCVT) instrument circuits.</p> <p>This activity is being performed as an alternate CAISO metering scheme due to the removal of the Unit 2 main bank transformer CCVTs. Removal of the CCVTs was performed under a design change package for CCVT removal. This was a result of a failure of one 500 kV CCVT on Unit 2 in October 2012. The new design will use the existing current transformers and potential transformers in the 500 kV switchyard for the new CAISO meter. The CAISO metering information was provided by the Diablo Canyon Power Plant (DCPP) 500 kV generator step-up transformers (main banks) and associated CCVTs. The new design has been issued by the Transmission Service Provider (TSP) to install the meter in the switchyard. This licensing basis impact evaluation is a review of the effects of the TSP design on DCPP structures, systems, and components (SSCs).</p> <p>The adverse element considered is a deterministic failure of the Unit 2 generator output breaker "Y" CT circuit within the new CAISO metering device which could affect the reliability of relay 587L-2a and thus be adverse to the back feed capability.</p>	
<p>Summary of Evaluation:</p> <p>The design change to install a CAISO revenue meter in the Unit 2 500 kV breaker protection scheme does not introduce the possibility of a change in the frequency of an accident because the affected systems are used for monitoring only, with no associated control functions. The affected systems are not initiators of any accident identified in Chapter 15 of the Updated Final Safety Analysis Report (UFSAR). A failure modes and effects analysis (FMEA) performed confirms no new failure modes are introduced. The likelihood for a malfunction due to this meter failing will not increase.</p> <ul style="list-style-type: none"> • The consequences (dose) of an accident previously evaluated in the UFSAR will not increase because the affected meter/instrument being installed is of high quality designed for this application. 	

- The consequences (dose) of a malfunction previously evaluated in the UFSAR will not increase because no new failure modes are introduced.
- There is no increase for the possibility of a new accident because the affected 500 kV system cannot initiate any accident.
- The FMEA and reliability discussed indicate there is not a more than minimal increase in the possibility for a malfunction of an SSC important to safety.
- This change does not affect any fission product barriers or cause any system parameters to change.
- There is no change to any method of evaluation as defined in any procedure or licensing bases document.

Conclusion:

The proposed activity was evaluated in accordance with the requirements of 10 CFR 50.59 and concluded that this change does not require prior NRC approval.

13-013 Relocate CCVTs to 500kV Switchyard	
Reference Document No.:	SAPN 50561920
Reference Document Title:	Relocate CCVTs to 500 kV Switchyard
Activity Description/Summary of Evaluation:	
<p>California Independent System Operator (CAISO) metering equipment is being connected to the Unit 1 500 kV output breaker current transformer (CT) and tie-line capacitive coupled voltage transformers (CCVT) instrument circuits in the Diablo Canyon Power Plant (DCPP) switchyard. The CAISO equipment is not described in the Updated Final Safety Analysis Report (UFSAR), but affects the described DCPP 500 kV transmission interface.</p> <p>The installed equipment will provide real time Unit 1 net megawatt/mega volts amp reactive output to CAISO and is needed as an alternate CAISO metering scheme due to the removal of the Unit 1 main bank transformer CCVTs. Removal of the CCVTs is performed under a separate design change package as a corrective action due to failure of a CCVT on Unit 2 in October 2012.</p>	
Summary of Evaluation:	
<p>Adverse elements from the 50.59 screen result from a deterministic failure of the Unit 1 generator output breaker "Y" CT circuit within the CAISO metering device which could affect relay 587L-1A. Spurious actuation of this relay would open the generator output breakers resulting in loss of load (Condition II event), or loss of backfeed depending on plant conditions.</p> <p>The evaluation concluded that:</p> <ul style="list-style-type: none"> • The reliability of the CAISO meter installed by this proposed change is comparable to the existing protection relays. The frequency of loss of load events due to the addition of the meter is not discernibly changed. Therefore, the increase in frequency of occurrence for evaluated accidents is not more than minimal. • The reliability of the CAISO meter is comparable to other 500 kV system components, so the magnitude of impact on the likelihood of 500 kV malfunctions is not discernible. Therefore, the increase in likelihood of evaluated malfunctions is not more than minimal. • The evaluated consequences of loss of offsite load (15.5.10) are unaffected by this change. Therefore, the increase in consequences for evaluated accidents is 	

not more than minimal.

- This activity does not discernibly affect the ability to place the 500 kV system in service to mitigate the UFSAR described anticipated operational occurrences. Therefore the increase in the consequences (dose to public or Control Room) of a malfunction of a structure, system, and component important to safety is not more than minimal.
- Accidents related to this activity are bounded by loss of load, which is evaluated. No possibility for an accident of a new type is created.
- The results of malfunctions related to this activity are bounded by malfunction of the 500 kV generator output breakers. No possibility for a different result is created.
- This design change does not alter or exceed any design basis limit for a fission product barrier, nor does it affect any controlling parameter.
- This design change does not involve a method of evaluation.

Conclusion: Prior NRC approval is not required to implement this activity.

13-021 TMOD Disable Thot Loop 3	
Reference Document No.:	SAPN Order 60060222
Reference Document Title:	TMOD Disable Thot Loop 3
Activity Description/Summary of Evaluation:	
<p>The proposed activity will disable (remove from scan) the Unit 1 (U1) Thot Resistance Temperature Detector (RTD) Loop 3 input to the reactor vessel level instrumentation system (RVLIS) Train A. This is a software change performed within the existing capabilities of the RVLIS program. RVLIS calculates, outputs, and displays the reactor coolant system (RCS) subcooled margin. Hence, the subcooled margin monitor (SCMM) U1 Train A Loop 3 Thot RTD input is disabled as well.</p> <p>The Updated Final Safety Analysis Report (UFSAR) description of the RVLIS temperature compensation is not specific to the inputs or the selection logic: Consequently, the licensing basis impact evaluation (LBIE) screen concluded that this temporary modification (TMOD) has no adverse impact on the UFSAR-described RVLIS temperature compensation design function or how this function is performed or controlled.</p> <p>The UFSAR description of the SCMM is specific to the number and type of temperature inputs. Consequently, the LBIE screen concluded that this TMOD has an adverse impact on how the SCMM design function is performed or controlled. U1 SCMM Train A auctioneers high the RCS Loops 3 and 4 Thot (wide range) RTD temperature signals, with the hottest Train A core exit thermocouple signal. This TMOD disables the U1 Train A RCS Thot RTD temperature input from Loop 3, leaving the SCMM Train A with temperature inputs from RCS Thot RTD Loop 4 (wide range) and the hottest Train A core exit thermocouple. Redundant Train B remains independent and is unaffected by this TMOD.</p>	
Summary of Evaluation:	
<p>Prior NRC approval is not required based on the following:</p> <ul style="list-style-type: none"> • RVLIS/SCMM are monitoring subsystems and cannot initiate any accidents. The proposed activity is not an accident initiator and does not affect, nor does it alter or increase the frequency an accident will occur as identified in the UFSAR. • A malfunction of RVLIS/SCMM is not described in the UFSAR. The proposed activity does not impact train redundancy, diversity, separation, or independence of RVLIS/SCMM. Train B is not impacted by this TMOD for either RVLIS or SCMM. The proposed activity will not initiate a new malfunction, nor will it affect, alter or increase the likelihood of occurrence of any malfunction previously 	

evaluated in the UFSAR.

- RVLIS/SCMM are monitoring subsystems and have no direct influence on the consequences of any accidents. Operators will still have subcooled margin indication provided by both trains of SCMM. The proposed activity does not affect, alter or increase the consequences of an accident.
- RVLIS/SCMM are monitoring subsystems and have no direct influence on the consequences of any malfunctions. Operators will still have subcooled margin indication provided by both trains of SCMM. The proposed activity does not affect, alter or increase the consequences of a malfunction of an structure, system, and component (SSC) important to safety previously evaluated in the UFSAR.
- RVLIS/SCMM are monitoring subsystems. The proposed activity does not create an accident of a different type than any previously evaluated in the UFSAR.
- The UFSAR does not explicitly describe the failure/malfunction of RVLIS/SCMM. This TMOD does nothing that would initiate a failure/malfunction in both trains of RVLIS/SCMM. This TMOD only impacts U1 Train A RVLIS/SCMM. The proposed activity does not create the possibility for a malfunction of an SSC important to safety with a different result.
- RVLIS/SCMM are monitoring systems and cannot directly impact a design basis limit for a fission product barrier (DBLFPB). The proposed activity does not affect, alter, modify or exceed the DBLFPB.
- This proposed activity does not involve a change to any method of evaluation described in the UFSAR.

13-022 12 KV BUS D (and E) VOLTAGE	
Reference Document No.:	Procedures AR PK19-02 and AR PK19- 07
Reference Document Title:	12 KV BUS D (and E) VOLTAGE
Activity Description/Summary of Evaluation:	
<p>Operator response to low voltage alarm conditions is being modified to include the following :</p> <ol style="list-style-type: none"> 1. Check for voltage imbalance. 2. Trip the reactor (if on-line and an open-phase condition is detected) in preparation for removing the vital busses from Startup Power and/or removing reactor coolant pumps (RCPs) from service. 3. Remove loads from the 12 kV busses while attempting to maintain 1 or 2 RCPs running for forced cooling of the reactor coolant system (RCS) and a circulating water pump running for cooling the condenser and avoid realigning service cooling water. <p>The proposed change will manually diagnose and separate the 230 kV system from Diablo Canyon Power Plant safety-related loads upon identification of a fault that has the potential to impact operating equipment. The changes will (1) disconnect all safety-related equipment from the degraded offsite power source to ensure their continued reliable operation and (2) mitigate the impact of a line/connection fault by reducing the load on the transformer to the point that continued three-phase output operation is capable with only two-phase input. The adverse element is a new manual action procedurally required to diagnose and separate from a degraded source of offsite power.</p> <p>Additionally, the proposed change introduces a new manual action that momentarily deenergizes the 4.16 kV vital busses and causes them to realign to their respective emergency diesel generators (EDGs). Revising the operator response to disconnect the 4 kV vital busses from the 230 kV offsite power supply when a fault involving a voltage imbalance occurs ensures that the structures, systems and components (SSCs) will be removed from the faulted power supply. However, this is not an action previously considered in the current licensing basis. Transferring the 4.16 kV vital busses to their respective EDGs is the same as what would currently happen automatically with balanced, degraded voltage; however, in this instance the action is being initiated by a new, manual operator action. This change is therefore adverse and will be evaluated.</p>	

Summary of Evaluation:

Prior NRC approval is not required based on the following:

The updated operator instructions will manually open startup transformer feeder breaker to 4 kV Bus F, G, and H in response to a degraded 230 kV system. The activity was reviewed against chapters 6 and 15 in the UFSAR for potential impact to accident frequency. The proposed activity is not an accident initiator and does not affect, nor does it alter or increase the frequency an accident will occur as identified in the UFSAR.

This activity provides guidance on identifying and responding to a malfunction with the 230 kV system not explicitly identified in chapter's 6 or 15 of the UFSAR. However, the malfunction causes a degradation of the 230 kV offsite power source; the activity responding to a degraded 230 kV system is fully described, analyzed and bounded by the design and licensing basis as shown throughout chapters 6 and 15 of the UFSAR. The proposed activity, the procedure change, will not initiate a new malfunction, nor will it affect, alter or increase the likelihood of occurrence of any malfunction previously evaluated in the UFSAR.

The new operator action will diagnose a degraded 230 kV source of offsite power. The EDGs will continue to provide the vital backup power source for any accident that assumes loss of offsite power (LOOP) such that the UFSAR dose consequences are not impacted and remain bounding. Therefore, the proposed activity is a procedure change that does not affect, alter or increase the consequences of an accident.

The new operator action will separate the 230 kV offsite power source from the vital busses when it is degraded and unavailable to perform its design function. This activity is bounded by LOOP identified in both chapters 6 and 15 of the UFSAR. The EDGs are relied upon as the vital backup power source. LOOP has been evaluated for all condition events in UFSAR chapter 15 and the accident analysis is bounding for dose consequences for SSC malfunctions associated with LOOP. The proposed activity is a procedure change that does not affect, alter or increase the consequences of the SSC important to safety previously evaluated in the UFSAR.

The proposed activity will manually remove the 230 kV offsite power source from the vital busses when it is degraded and unavailable to perform its design function. This action is bounded by LOOP, and does not alter or place any SSC in a configuration outside the design or licensing limits, nor does this create or initiate any new accidents. The proposed activity does not create an accident of a different type than any previously evaluated in the UFSAR.

The 230 kV system is vulnerable to a newly identified malfunction. This malfunction will result in alarm inputs 877 or 878 (12 kV Bus D Voltage - AR PK19-02) or inputs

885 or 886 (12 kV Bus E Voltage - AR PK19-07). The proposed procedural guidance will instruct operators on how to identify and verify the voltage potential differences between busses (D, E, F, G and H - depending on alarm input) and, if appropriate, opening the 230 kV startup power feeder breaker to the 4.16 kV vital busses, which makes the EDGs the backup power source for the vital busses. The results of the proposed action are similar to and bounded by LOOP. SSC malfunctions associated with a LOOP have been fully analyzed and bounded by the design and licensing basis as shown in chapters 6 and 15 of the UFSAR. The proposed activity is bounded by LOOP and does not create the possibility for a malfunction of a SSC important to safety with a different result.

The LOOP analysis results presented in the UFSAR continue to be bounding such that there is no impact on the three fission product barriers associated with the fuel cladding, RCS boundary or containment integrity. The proposed activity does not affect, alter, modify or exceed the design basis limit for a fission product barrier.

This proposed activity does not involve any change in methodology described in the UFSAR.

13-026 CFCU Modifications	
Reference Document No.:	DDP 1000024907
Reference Document Title:	CFCU Modifications
Activity Description/Summary of Evaluation:	
<p>The containment fan cooler units (CFCUs) are being modified. The design change includes the following activities:</p> <ol style="list-style-type: none"> 1) Change the analyzed range of Unit 1 and 2 CFCU air flows per Westinghouse Calculation CN-CRA-12-5, "Diablo Canyon Containment Integrity Reanalysis." 2) Adjust the analyzed range of air flows from activity 1 for CFCUs with Super Radiator Coils (SRC) (replacement) cooling coils per PG&E Calculation STA-296, "SRC CFCU Air Flow Limits for Design Basis Heat Removal Rates." 3) Modify all Unit 2 CFCU inlet dampers from parallel to opposite blade configuration to improve air flow adjustment. 4) Replace the cooling coil assemblies for CFCUs 2-2 and 2-5 with new cooling coils that include stainless steel frames to replace the existing carbon steel frames. Each of the new cooling coil assemblies will have a single coil bank instead of two banks. Each coil assembly consists of a stack of six coils. The new cooling coils will fit into the same space as the existing coils in the CFCUs. 5) Replace the support peripherals, drain pans, and bottom tanks of the cooling coils for CFCUs 2-2 and 2-5 with new components fabricated from stainless steel. Instead of the existing carbon steel components. 6) Reroute the component cooling water (CCW) supply and return headers for CFCUs 2-2 and 2-5 to accommodate the new coil configuration. 	
Summary of Evaluation:	
<p>The following effects were determined to be adverse by the 10 CFR 50.59 screen for the proposed activity:</p> <p>Update Final Safety Analysis Report (UFSAR) 6.2.2.2.1.2 states, "The heat removal capability of the cooling coils is 81×10^6 Btu/hr per fan cooler unit at saturation conditions (271°F, 47 psig), with 2000 gpm cooling water supply at 125°F." The replacement coils have a slightly lower nominal heat removal rate (78×10^6 Btu/hr). Although this lower rate is designed to prevent overheating the CCW system, it is considered adverse for containment heat removal.</p>	

UFSAR 6.2.2.2.1.2 also states, "Each fan can provide a minimum flowrate of 47,000 cfm when operating against the system resistance of approximately 3-3/4 inches of water existing during the accident condition." The accident flows are reanalyzed for minimums of 34,000 cfm (existing coils) and 37,000 cfm (SRC coils). Flowrates lower than 47,000 cfm are considered adverse for containment heat removal, hydrogen mixing, and mixing of unsprayed areas (iodine scrubbing).

The containment integrity analysis was reperformed to demonstrate that all safety functions and design requirements are still met for revised input parameters which were not bounded by the previous analysis. Per NEI 96-07, this is adverse by default.

This evaluation, per 10 CFR 50.59, has determined that the proposed changes do not require prior NRC approval based on the following:

The CFCUs will not initiate any UFSAR evaluated accident. Therefore this activity will not result in more than a minimal increase in the frequency of any previously evaluated accident.

The replacement coils and modified dampers have no discernible effect on the likelihood of CFCU malfunction. Therefore any increase in the likelihood of malfunction due to the proposed activity is not more than minimal.

The largest percentage increase relative to remaining margin to the regulatory limit is 0.42 percent (0.05 Rem) for dose to control room thyroid, well below the NEI 96-07 definition of minimal. Therefore, the change in consequences from this activity is not more than minimal.

The likelihood of malfunction is not discernibly affected by this activity, so the UFSAR assumption of two available CFCUs to mitigate consequences remains bounding. Malfunctions of other structures, systems, and components (SSCs) that require CFCU mitigation result in previously evaluated accidents. Therefore, this activity will not result in more than a minimal increase in the consequences of a previously evaluated malfunction of an SSC important to safety.

This activity is bounded by loss of a CFCU, and/or loss of one train of CCW, neither of which initiate an accident. Therefore this activity will not result in an accident of a different type than any previously evaluated in the UFSAR.

Results of malfunctions related to the replacement of CFCU coils and damper modifications are bounded by loss of a CFCU, and/or loss of one train of CCW. No possibility for a result of a different type than previously evaluated in the UFSAR is created.

The containment integrity reanalysis performed for this activity determines that the 47 psig containment design basis pressure limit is not exceeded by the proposed activity. Therefore no design basis limit will be exceeded or altered.

The proposed activity does not involve a departure from a method of evaluation described in the UFSAR.

13-029 Incorporate SRSS/ABSUM for Seismic and LOCA Loads	
Reference Document No.:	Change Request W-5.2 (1)
Reference Document Title:	Incorporate SRSS/ABSUM for Seismic and LOCA Loads
Activity Description/Summary of Evaluation:	
<p>This proposed change involves a change to the current licensing basis (CLB) to describe the square-root-of-the-sum-of-squares (SRSS) method and the absolute sum (ABSUM) method as alternative acceptable methods for the combination of seismic faulted condition [Double Design Earthquake or Hosgri Earthquake] loads with loss-of-coolant accident (LOCA) loads in the evaluation of ASME Section III, Class 1, reactor coolant system (RCS) components.</p>	
Summary of Evaluation:	
<p>The scope of this CLB change is describing an alternative methodology for combining seismic faulted condition and LOCA dynamic responses in support of design bases for the Diablo Canyon Power Plant Unit 1 and 2 RCS pressure boundary systems, components, and supports. Specifically, the alternative methodology being introduced is the use of the SRSS as the method of combining the seismic faulted condition and LOCA dynamic responses for ASME Section III, Class I components and supports as an alternative to the ABSUM method, which was approved in SSER-07. The proposed activity does not include combining dynamic responses other than LOCA and seismic faulted conditions.</p> <p>Per NEI 96-07, Section 4.3.8, since the proposed activity involves only a change to a method of evaluation, 10 CFR 50.59(c)(2)(i-vii) are not applicable and questions 1 through 7 are marked accordingly. The response to Evaluation Question Number 8 documents that all criteria relating to the use/application of an alternative method of evaluation have been satisfied, including a thorough understanding of the new method of evaluation, understanding the terms of the existing application of the new method of evaluation, and understanding of the constraints and limitations on the use of the new method of evaluation. The evaluation concludes that the change does not result in a departure from a method of evaluation described in the Updated Final Safety Analysis Report because the alternative method has been approved by NRC for the intended application. This change does not require prior NRC approval.</p>	

13-030 Change to Temperature Response due to MSLB	
Reference Document No.:	DDP 1000024947
Reference Document Title:	Change to Temperature Response due to MSLB
Activity Description/Summary of Evaluation:	
<p>The temperature response due to a main steam line break (MSLB) in the turbine building (TB) and in the auxiliary building (AB) Area L is increasing due to implementing a more conservative set of MSLB mass and energy (M&E) releases and superheated steam effects that are based on the replacement steam generators (RSGs). These increased compartment temperature responses are being implemented as revised figures in the Updated Final Safety Analysis Report (UFSAR) that are used for establishing equipment qualification (EQ) and structural acceptability in the TB and AB Area L. A design change package documents the appropriate update revisions to EQ calculations, EQ files and civil calculations that are impacted by these revised compartment temperature responses.</p> <p>In addition, a UFSAR change is being made to describe the use of the GOTHIC computer code to perform the compartment temperature response for these areas instead of the PCFLUD code that is currently listed.</p>	
Summary of Evaluation:	
<p>Based on the evaluation results summarized below, this proposed activity is acceptable to implement without prior NRC approval per 10 CFR 50.59.</p> <ul style="list-style-type: none"> • The revised compartment profiles for the TB and AB Area L are the result of the MSLB outside containment, which represents accidents already described in the UFSAR Section 3.6.4, and cannot be an initiator of any accident. Therefore, this proposed activity does not introduce the possibility of a change in the frequency of an accident previously evaluated in the UFSAR. • The revised compartment temperature profiles for the TB and AB Area L due to a MSLB outside containment remain within acceptable structural limits and the environmental conditions remain within acceptable limits to ensure that no safety-related equipment in these compartments is adversely impacted. There is no increase in the likelihood of a malfunction of a structure, system, and component (SSC) important to safety previously evaluated in the UFSAR. • The revised compartment temperature profiles for the TB and AB Area L remain within all acceptance limits such that the MSLB doses in UFSAR Section 15.5.18 are not impacted and remain bounding. This proposed activity does not result in more than a minimal increase in the consequences of an accident previously 	

evaluated in the UFSAR.

- The environmental conditions for these revised compartment temperature profile remain within acceptable limits to ensure that no safety related equipment in these compartments is adversely impacted. All SSCs continue to perform their design functions as described in the UFSAR. This proposed activity does not result in more than a minimal increase in the consequences of an SSC malfunction previously evaluated in the UFSAR.
- The revised compartment profiles for the TB and AB Area L are the result of MSLBs outside containment which represents accidents already described in the UFSAR Section 3.6.4, and cannot be an initiator of any new or different accident. The proposed activity does not create the possibility for an accident of a different type than any previously evaluated in the UFSAR.
- All SSCs continue to perform their design functions as described in the UFSAR and no new equipment failure modes have been created. This proposed activity does not create the possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the UFSAR.
- The revised compartment profiles for the TB and AB Area L are the result of MSLBs outside containment and which do not represent a challenge to any fission product barrier (fuel cladding, reactor coolant system, or containment). Therefore, this proposed activity does not result in altering or exceeding a design basis limit for a fission product barrier as described in the UFSAR.
- The GOTHIC 8.0 code has been verified to provide results that are essentially the same as the PCFLUD code originally described in the UFSAR. The GOTHIC 8.0 model has been implemented consistent with previous GOTHIC versions that have already been evaluated per 10 CFR 50.59. Therefore, per the guidance in NEI 96-07 Section 4.3.8.1, using the GOTHIC 8.0 code to perform the TB and AB Area L compartment temperature profiles is a change to an element of a method of evaluation described in the UFSAR that is not a departure of a method of evaluation described in the UFSAR and does not require prior NRC approval.