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PG&E Letter DCL-15-087

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

10 CFR 50.90

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

Revision to TS 3.4.15 for License Amendment Request for Adoption of Technical Specification Task Force Traveler TSTF-432, Revision 1, "Change in Technical Specification End States (WCAP-16294)"

- References:
1. PG&E Letter DCL-14-058, License Amendment Request 14-03, "License Amendment Request for Adoption of Technical Specification Task Force Traveler TSTF-432, Revision 1, 'Change in Technical Specification End States (WCAP-16294),' " dated July 28, 2014 (ADAMS Accession No. ML14209B076)
 2. PG&E Letter DCL-15-055, "Response to NRC Request for Additional Information Regarding License Amendment Request 14-03, 'License Amendment Request for Adoption of Technical Specification Task Force Traveler TSTF-432, Revision 1, 'Change in Technical Specification End States (WCAP-16294),' " dated May 7, 2015 (ADAMS Accession No. ML15127A648)

Dear Commissioners and Staff:

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted License Amendment Request (LAR) 14-03, "License Amendment Request for Adoption of Technical Specification Task Force Traveler TSTF-432, Revision 1, 'Change in Technical Specification End States (WCAP-16294).' " LAR 14-03 proposed to modify the Technical Specifications (TS) to risk-inform requirements regarding selected Required Action End States. In Reference 2, PG&E submitted a response to a request for additional information for LAR 14-03.

On July 7, 2015, the NRC Staff requested the proposed TS 3.4.15, "RCS Leakage Detection Instrumentation," be revised to not allow the plant to stop in Mode 4 when there is a loss of safety function due to all required Reactor Coolant System (RCS) leakage detection monitors being inoperable. The proposed TS 3.4.15, Condition F,



has been revised to be applicable when Conditions A, B, C, or D are not met. With this change, Condition F (which allows shutdown to Mode 4 only) will not apply for the condition (Condition E) when all required RCS leakage detection monitors are inoperable.

Attachment 1 to the Enclosure provides a page markup of the existing TS 3.4.15 to show the proposed change. Attachment 2 to the Enclosure provides a revised (clean) TS 3.4.15 page. Attachment 3 to the Enclosure provides the marked up TS 3.4.15 Bases for information only. The TS 3.4.15 markup page, revised page, and TS Bases marked up pages contained in the Enclosure supersede those previously provided in Attachments 1, 2, and 3 to the Enclosure of Reference 1, respectively.

This information does not affect the results of the technical evaluation or the no significant hazards consideration determination previously transmitted in Reference 1.

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

In accordance with site procedures and the Quality Assurance Program, the proposed TS change has been reviewed by the Plant Staff Review Committee.

If you have any questions or require additional information, please contact Mr. Hossein Hamzehee at 805-545-4720.

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

Executed on August 6, 2015.

Sincerely,

Barry S. Allen
Vice President, Nuclear Services

kjse/4328 SAPN 50636291
Enclosure

cc: Diablo Distribution
cc/enc: Marc L. Dapas, NRC Region IV
Siva P. Lingam, NRR Project Manager
Gonzalo L. Perez, Branch Chief, California Department of Public Health
John Reynoso, Acting NRC Senior Resident Inspector

Enclosure
Attachment 1
PG&E Letter DCL-15-087

Proposed Technical Specification Change

Technical Specifications Inserts

Insert 1

-----NOTE-----
LCO 3.0.4.a is not
applicable when
entering MODE 4.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Any containment sump monitor inoperable. <u>AND</u> Containment atmosphere particulate radioactivity monitor inoperable. <u>AND</u> Required CFCU condensate collection monitor inoperable.	D.1 Analyze grab samples of the containment atmosphere.	Once per 12 hours
	<u>AND</u> D.2.1 Restore containment sump monitor to OPERABLE status.	7 days
	<u>OR</u> D.2.2 Restore containment atmosphere particulate radioactivity monitor to OPERABLE status.	7 days
	<u>OR</u> D.2.3 Restore required CFCU condensate collection monitor to OPERABLE status.	7 days
E. All required monitors inoperable.	E.1 Enter LCO 3.0.3.	Immediately
F. Required Action and associated Completion Time of Condition A, B, C, or D not met.	F.1 Be in MODE 3.	6 hours
	<u>AND</u> F.2 Be in MODE 5 4.	<div style="border: 1px solid black; padding: 2px; display: inline-block;">Insert 1</div> 36-12 hours

Revised Technical Specification Page

Remove Page

3.4-34

Insert Page

3.4-34

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Any containment sump monitor inoperable. <u>AND</u> Containment atmosphere particulate radioactivity monitor inoperable. <u>AND</u> Required CFCU condensate collection monitor inoperable.	D.1 Analyze grab samples of the containment atmosphere.	Once per 12 hours
	<u>AND</u> D.2.1 Restore containment sump monitor to OPERABLE status.	7 days
	<u>OR</u> D.2.2 Restore containment atmosphere particulate radioactivity monitor to OPERABLE status.	7 days
	<u>OR</u> D.2.3 Restore required CFCU condensate collection monitor to OPERABLE status.	7 days
E. All required monitors inoperable.	E.1 Enter LCO 3.0.3.	Immediately
F. Required Action and associated Completion Time of Condition A, B, C, or D not met.	F.1 Be in MODE 3. <u>AND</u>	6 hours
	F.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours

Technical Specification Bases Change(s)
(For information only)

BASES

ACTIONS
(continued)

D.1, D.2.1, D.2.2, and D.2.3

With any containment sump monitor, the containment atmosphere particulate radioactivity monitor, and the CFCU condensate collection monitor inoperable, the only means of detecting LEAKAGE is the containment gaseous radioactivity monitor. The containment atmosphere gaseous radioactivity monitor typically cannot detect a 1 gpm leak within four hours when RCS activity is low. In addition, this configuration does not provide the required diverse means of leakage detection. Indirect methods of monitoring RCS leakage must be implemented. Grab samples of the containment atmosphere must be taken and analyzed to provide alternate periodic information. The 12 hour interval is sufficient to detect increasing RCS leakage. The Required Action provides 7 days to restore another RCS leakage monitor to OPERABLE status to regain the intended leakage detection diversity. The 7 day Completion Time ensures that the plant will not be operated in a degraded configuration for a lengthy time period.

E.1

With all required monitors inoperable, (LCO a, b, and c) no means of monitoring leakage are available, and immediate plant shutdown to MODE 5, the first MODE that requirements of this LCO are not applicable, in accordance with LCO 3.0.3 is required.

F.1 and F.2

If a Required Action of Condition A, B, C, or D, or E cannot be met, the plant must be brought to a MODE in which overall plant risk is reduced~~the requirement does not apply~~. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5-4 within 36-12 hours.

Remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 8). In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 8, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action F.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk

assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

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.

(continued)

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.4.15.1

SR 3.4.15.1 requires the performance of a CHANNEL CHECK of the required containment atmosphere radioactivity monitors. The check gives reasonable confidence that the channels are operating properly. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.4.15.2

SR 3.4.15.2 requires the performance of a CHANNEL FUNCTIONAL TEST (CFT) on the required containment atmosphere radioactivity monitors. The test ensures that the monitors can perform their function in the desired manner including alarm functions. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.4.15.3, SR 3.4.15.4, and SR 3.4.15.5

These SRs require the performance of a CHANNEL CALIBRATION for each of the RCS leakage detection instrumentation channels. The calibration verifies the accuracy of the instrument string, including the instruments located inside containment. The Frequency of 24 months (except for the containment atmosphere particulate and gaseous radioactivity monitors which have a frequency of 18 months) is consistent with refueling cycle and considers channel reliability. Again, operating experience has proven that this Frequency is acceptable.

REFERENCES

1. 10 CFR 50, Appendix A, Section IV, GDC 30.
2. Regulatory Guide 1.45, Revision 0, "Reactor Coolant Pressure Boundary Leakage Detection Systems," May 1973.
3. FSAR, Section 5.2.7.
4. NUREG-609, "Asymmetric Blowdown Loads on PWR Primary System," 1981.
5. Generic Letter 84-04, "Safety Evaluation of Westinghouse Topical Reports Dealing with Elimination of Postulated Breaks in PWR Primary Main Loops."
6. FSAR, Section 3.6B.
7. NUREG-1061, Volume 3, "Report of the U.S. Nuclear Regulatory Commission Piping Review Committee," 1984.
8. WCAP-16294-NP-A, Rev. 1, "Risk-Informed Evaluation of Changes to Technical Specification Required Action Endstates for

Westinghouse NSSS PWRs," June 2010.
