

September 21, 2016

PG&E Letter DCL-16-092
PG&E Letter DIL-16-014

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

10 CFR 50.54, 10 CFR 72.32

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Docket No. 72-26, Materials License No. SNM-2511
Diablo Canyon Independent Spent Fuel Storage Installation
Emergency Plan Implementing Procedure Update

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54, and including the requirements of 10 CFR 72.32 for the Independent Spent Fuel Storage Installation, Pacific Gas and Electric Company (PG&E) is providing a summary of the analysis of changes to Emergency Plan (E-Plan) Implementing Procedure OM10.ID1, "Maintaining Emergency Preparedness."

The associated enclosures are listed below:

Enclosure	Title
1	Diablo Canyon Power Plant Emergency Plan Implementing Procedures, Revision Numbers for Emergency Plan Implementing Procedures
2	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 14, "Maintaining Emergency Preparedness"

PG&E evaluated the changes for a reduction in effectiveness, as defined in 10 CFR 50.54(q), and concluded that the changes do not reduce the effectiveness of the E-Plan, and that the E-Plan continues to meet the requirements in Appendix E to 10 CFR 50 and the planning standards of 10 CFR 50.47(b). Therefore, prior NRC approval of the associated changes was not required.



This update does not contain privacy and proprietary information in accordance with NRC Generic Letter 81-27, "Privacy and Proprietary Material in Emergency Plans."

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

If there are questions regarding this update, please contact me at (805) 545-3446.

Sincerely,


for Mike Ginn 9/21/16

Michael A. Ginn
Emergency Planning Manager

bnsn/4540/50868684

Enclosures

cc/enc: John M. Goshen, P.E., NMSS Project Manager
Kriss M. Kennedy, NRC Region IV Administrator
Christopher W. Newport, NRC Senior Resident Inspector
Balwant K. Singal, NRR Senior Project Manager
Senior Emergency Preparedness Inspector (RGN-IV/DR)

Enclosure 1
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**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

Revision Numbers for Emergency Plan Implementing Procedures

DIABLO CANYON POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURES

<u>Proc. No.</u>	<u>Rev.</u>	<u>Title</u>
OM10.ID1*	14	Maintaining Emergency Preparedness
OM10.DC1	8	Emergency Preparedness Drills and Exercises
EP G-1	44	Emergency Classification and Emergency Plan Activation
EP G-2	49	Interim Emergency Response Organization
EP G-3	58	Emergency Notification of Off-Site Agencies
EP G-4	28	Assembly and Accountability
EP G-5	14	Evacuation of Non-Essential Site Personnel
EP OR-3	10	Emergency Recovery
EP RB-1	8	Personnel Dosimetry
EP RB-2	8	Emergency Exposure Guides
EP RB-3	7	Stable Iodine Thyroid Blocking
EP RB-4	5	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	8	Alternate Personnel Decontamination Facilities
EP RB-8	27	Instructions for Field Monitoring Teams
EP RB-9	15	Calculation of Release Rate
EP RB-10	19	Protective Action Recommendations
EP RB-11	14	Emergency Offsite Dose Calculations
EP RB-12	11	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	9	Core Damage Assessment Procedure
EP RB-14A	2	Initial Detection of Fuel Cladding Damage
EP RB-15	15	Post Accident Sampling System
EP RB-16	13	Operating Instructions for the EARS Computer Program
EP R-2	33	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	9	Release of Radioactive Liquids
EP R-7	16A	Off-Site Transportation Accidents
EP EF-1	51	Activation and Operation of the Technical Support Center
EP EF-2	38	Activation and Operation of the Operational Support Center
EP EF-3	43	Activation and Operation of the Emergency Operations Facility
EP EF-4	20	Activation of the Off-Site Emergency Laboratory
EP EF-9	11	Backup Emergency Response Facilities
EP EF-10	16	Activation and Operation of the Joint Information Center
EP EF-11	2	Alternate Emergency Response Facilities / Incident Command Post (ICP)

***Revised Document**

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure OM10.ID1, Revision 14
Maintaining Emergency Preparedness

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 14

Original Content	Content Change	Reason for Change
<p>Section 5.7.2. c. Controlled copies of procedures maintained within ERO position binders shall be audited within seven working days of a real event or drill. These audits satisfy annual audit requirements of AD3.ID5, "Procedure Distribution and Control."</p>	<p>Section 5.7.2. c. Controlled copies of procedures maintained within ERO position binders shall be audited within seven working days of a real event or drill. These audits satisfy annual audit requirements of AD3.ID5, "Procedure Distribution and Control."</p> <ol style="list-style-type: none"> 1. Completed audits shall be documented per AD3.ID5. 2. Identified deficiencies shall be documented in the corrective action program per OM7.ID1, "Problem Identification and Resolution." 3. Completed audit forms shall be provided to the site procedure group for processing as records per AD10.ID1, "Storage and Control of Quality Assurance Records." 	<p>Process change with no change of intent.</p> <p>Steps are being added to provide clear procedural direction. Steps were added to direct documentation of procedure audits and deficiencies and direction on record retention. These activities were occurring, but were not being documented per Interdepartmental Administrative Procedure AD3.ID5, "Procedure Distribution and Control."</p> <p>This is not a change of intent within the Emergency Plan (E-Plan). The audits will continue to be done as required by the E-Plan. This change provides additional information regarding documentation requirements established in other station procedures.</p>