



October 12, 2016

PG&E Letter DCL-16-103
PG&E Letter DIL-16-015

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 Section 8 Update

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54 and 10 CFR 72.32 for the Independent Spent Fuel Storage Installation, Pacific Gas and Electric Company (PG&E) is providing updated Section 8 of the Emergency Plan (E-Plan), "Maintaining Emergency Preparedness."

The associated enclosures are listed below:

Enclosure	Title
1	Diablo Canyon Power Plant Emergency Plan, Revision and Corresponding Change Numbers for Emergency Plan Sections and Appendices
2	Diablo Canyon Power Plant Summary of the Analysis of Changes to Emergency Plan, Section 8, Revision 4.15, "Maintaining Emergency Preparedness"

PG&E evaluated the changes for a potential reduction in effectiveness, as defined in 10 CFR 50.54(q), and PG&E concluded that the changes do not reduce the effectiveness of the E-Plan, and the E-Plan continues to meet the requirements in Appendix E of 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 Mr. Michael A. Ginn, Emergency Planning Manager, at (805) 545-3446.

Sincerely,

NIMICK FOR WELSCHE

James M. Welsch
Vice President, Nuclear Generation

bnsn/4540/50871269

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, NRC Senior Project Manager
Senior Emergency Preparedness Inspector (RGN-IV/DR)

Diablo Canyon Power Plant Emergency Plan

Revision and Corresponding Change Numbers for
Emergency Plan Sections and Appendices

DIABLO CANYON POWER PLANT EMERGENCY PLAN

Section/Appendix	Rev. & Change	Title
Section 1	Rev. 4, Change 07	Definitions & Abbreviations
Section 2	Rev. 4, Change 04	Scope and Applicability
Section 3	Rev. 4, Change 00	Summary of Emergency Plan
Section 4	Rev. 4, Change 15	Diablo Canyon Power Plant Emergency Plan Emergency Conditions
Section 5	Rev. 4, Change 17	Organizational Control of Emergencies
Section 6	Rev. 4, Change 17	Emergency Measures
Section 7	Rev. 4, Change 20	Emergency Facilities and Equipment
Section 8*	Rev. 4, Change 15	Maintaining Emergency Preparedness
Section 9	Rev. 4, Change 02	Recovery
Section 10	Rev. 4, Change 02	References
Appendix A	Rev. 4, Change 07	Procedures
Appendix B	Rev. 4, Change 02	Offsite Agency Support Documents
Appendix C	Rev. 4, Change 00	Non-Applicable NUREG-0654 Standards
Appendix E	Rev. 4, Change 00	Evacuation Time Estimates
Appendix F	Rev. 4, Change 03	ERO On-Shift Staffing Analysis Report
Appendix G	Rev. 4, Change 01	Protective Action Recommendation (PAR) Strategy Bases
Appendix D Table of Contents	Rev. 4, Change 01	Table of Contents
Appendix D, Introduction	Rev. 4, Change 02A	Introduction
Appendix D, Category R	Rev. 4, Change 02	Abnormal Rad Levels/Radiological Effluent
Appendix D, Category C	Rev. 4, Change 01A	Cold Shutdown/Refueling, System Malfunction
Appendix D, Category E	Rev. 4, Change 00	Independent Spent Fuel Storage Installation (ISFSI)
Appendix D, Category H	Rev. 4, Change 02	Hazards
Appendix D, Category S	Rev. 4, Change 01A	System Malfunction
Appendix D, Category F	Rev. 4, Change 01	Fission Products Barriers
Appendix D, Bases	Rev. 4, Change 02A	Fission Product Barrier Loss/Potential Loss Matrix Bases

***Revised Section**

Diablo Canyon Power Plant
Summary of the Analysis of Changes

Emergency Plan, Section 8, Revision 4.15

Maintaining Emergency Preparedness

**Diablo Canyon Power Plant Summary of the Analysis of Changes to Emergency Plan,
Section 8, Revision 4.15, "Maintaining Emergency Preparedness"**

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>E-Plan Section 8.1</p> <p>Plant personnel participate in a program of lectures, demonstrations, written assignments, Computer Based Training, and drills designed to familiarize them with fire protection and emergency procedures, and radiation protection principles. First aid techniques are offered and made available to those site personnel requesting it. Except as noted, courses are conducted by qualified plant personnel.</p>	<p>E-Plan Section 8.1</p> <p>Plant personnel participate in a program of lectures, demonstrations, written assignments, Computer Based Training, and drills designed to familiarize them with fire protection and emergency procedures, and radiation protection principles. First aid techniques are offered and made available to those site personnel requesting it. Except as noted, courses are conducted by qualified plant personnel. <u>At least once each calendar year, each member of the Emergency Preparedness staff is involved in training/professional development activities.</u></p>	<p>Change #1 – Process change with no change of intent.</p> <p>SAPN 50825573 was written to document the results of a conformance assessment performed by the Emergency Planning Licensing Basis Verification Project (EP LBVP). The conformance assessment was performed on the DCCP Emergency Plan against NRC regulations, Regulatory Information Statements, Regulatory Guides (RGs), Administrative Letters, Bulletins and Information Notices.</p> <p>This change addresses the recommendation documented in SAPN 50825573, Task 7. This information is already included in Procedure OM10.ID1, and including the commitment in the Emergency Plan (E-Plan) establishes a robust barrier against the potential altering of the commitment at a later date. This change is being made to ensure that the E-Plan conforms to the regulation (50.47(b)(16) – P.1). Therefore, there is no impact on how the E-Plan meets the Planning Standards, Functions, or Elements.</p> <p>No additional evaluation necessary.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>E-Plan Section 8.1.4</p> <p>In addition to the general fire protection training provided to individuals as part of General Employee Training, members of the plant Fire Brigade receive instruction in firefighting tactics, procedures and practical firefighting as part of the Fire Brigade and Emergency Response Training Program, in accordance with FSAR Appendix 9.5H requirements.</p>	<p>E-Plan Section 8.1.4</p> <p>In addition to the general fire protection training provided to individuals as part of General Employee Training, members of the plant Fire Brigade receive instruction in firefighting tactics, procedures and practical firefighting as part of the Fire Brigade and Emergency Response Training Program, in accordance with <u>Fire Protection Program</u> requirements.</p>	<p>Change #2 – Process change with change of intent.</p> <p>This change is being made in support of the new fire protection (FP) licensing basis, which complies with the requirements in 10 CFR 50.48(a), 10 CFR 50.48(c) and the guidance in RG 1.205, Revision 1, "Risk-informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants." 10 CFR 50.48(c) incorporates by reference NFPA 805. On April 14, 2016, the NRC issued Amendments No. 225 and No. 227 to transition the DCCP FP Program to a risk informed, performance-based program based on NFPA 805. The NFPA 805 based FP Program will supersede the current FP Program licensing basis which is based on 10 CFR 50, Appendix R and Appendix A to Branch Technical Position (APCSB) 9.5-1.</p> <p>This change updates the DCCP E-Plan to accurately reference the new FP Program licensing basis. This ensures that the E-Plan is technically accurate.</p> <p>10 CFR 50.54(q) Effectiveness Evaluation 2016-21 documents the detailed analysis of this change.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>E-Plan Section 8.3</p> <p>The Site Vice President along with other key supervisory personnel from both the plant staff and other participating offsite organizations is responsible for planning and scheduling drills and exercises.</p>	<p>E-Plan Section 8.3</p> <p>The <u>Vice President, Nuclear Generation</u>, along with other key supervisory personnel from both the plant staff and other participating offsite organizations, is responsible for planning and scheduling drills and exercises.</p>	<p>Change #3 – Editorial change with no change of intent.</p> <p>SAPN 50831930 documents that revisions should be made to align DCPD procedures with the PG&E Leadership Team Organization changes, effective January 15, 2016. Specifically, Task 41 documents the need to review emergency planning documents for impact. Upon review, it was determined that Section 8 of the E-Plan should be revised to update the title of "Site Vice President." Under the new organization structure, the "Site Vice President" is now "Vice President, Nuclear Generation." This editorial correction updates the E-Plan to ensure it remains technically accurate.</p> <p>No additional evaluation necessary.</p>
<p>N/A – New content.</p>	<p>E-Plan Section 8.3.1</p> <p>Emergency response capabilities are maintained during the interval between biennial exercises by conducting drills. During these drills, activation of all of the ERFs (TSC, OSC, EOF, and JIC) is not required, and instruction is permitted. County and State agencies may participate in these drills.</p>	<p>Change #4 – Process change with no change of intent.</p> <p>SAPN 50825573 was written to document the results of a conformance assessment performed by the Emergency Planning Licensing Basis Verification Project (EP LBVP). The conformance assessment was performed on the DCPD E-Plan against NRC regulations, Regulatory Information Statements, RGs, Administrative Letters,</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		<p>Bulletins and Information Notices.</p> <p>This change addresses the recommendation documented in SAPN 50825573, Task 10. This change is being made to ensure that the E-Plan conforms to Regulations (App.E.IV.F.2.b; and App.E.IV.F.2.e). Therefore, there is no impact on how the E-Plan meets the Planning Standards, Functions, or Elements.</p> <p>No additional evaluation necessary.</p>
<p>E-Plan Section 8.3.1.2</p> <p>Fire Drills</p> <p>Fire drills are conducted in accordance with FSAR Appendix 9.5H requirements.</p>	<p>E-Plan Section 8.3.1.2</p> <p>Fire Drills</p> <p>Fire drills are conducted in accordance with <u>Fire Protection Program</u> requirements.</p>	<p>Change #5 – Process change with change of intent.</p> <p>This change is being made in support of the new FP licensing basis, which complies with the requirements in 10 CFR 50.48(a), 10 CFR 50.48(c) and the guidance in RG 1.205, Revision 1, "Risk-informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants." 10 CFR 50.48(c) incorporates by reference NFPA 805. On April 14, 2016, the NRC issued Amendments No. 225 and No. 227 to transition the DCPD FP Program to a risk informed, performance-based program based on NFPA 805. The NFPA 805 based FP Program will supersede the current FP Program licensing basis which is based on 10 CFR 50, Appendix R and Appendix A to</p>

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		<p>Branch Technical Position (APCSB) 9.5-1.</p> <p>This change updates the DCPD E-Plan to accurately reference the new FP Program licensing basis. This ensures that the E-Plan is technically accurate.</p> <p>10 CFR 50.54(q) Effectiveness Evaluation 2016-21 documents the detailed analysis of this change.</p>
<p>E-Plan Section 8.4.1</p> <p>Independent assessments of the various aspects of the emergency preparedness program are conducted every twelve months in accordance with 50.54(t). The independent assessment includes, but is not limited to, the Emergency Plan, implementing procedures, training, readiness testing, equipment, and interfaces with State and Local organizations. The results are considered by management in modifying aspects of the Plan. In addition, telephone numbers referenced in the DCPD Emergency Plan Implementing Procedures (EIPs) and the Nuclear Emergency Response Communications Directory (NERC) are reviewed quarterly to ensure up-to-date contact numbers and notification lists.</p>	<p>E-Plan Section 8.4.1</p> <p>Independent assessments of the various aspects of the emergency preparedness program are conducted every twelve months in accordance with 50.54(t). The independent assessment includes, but is not limited to, the Emergency Plan, implementing procedures, <u>training, drills, exercises, procedures</u>, readiness testing, equipment, and interfaces with State and Local organizations. <u>The results of the independent assessment, along with recommendations for improvements, are documented and reported to DCPD management. The independent assessment report involving the evaluation for adequacy of interface with State and Local governments is made available to those governments.</u> The results are considered by management in</p>	<p>Change #6 – Process change with no change of intent.</p> <p>SAPN 50825573 was written to document the results of a conformance assessment performed by the Emergency Planning Licensing Basis Verification Project (EP LBVP). The conformance assessment was performed on the DCPD E-Plan against NRC regulations, Regulatory Information Statements, RGs, Administrative Letters, Bulletins and Information Notices.</p> <p>This change addresses the recommendation documented in SAPN 50825573, Task 12. The information on 50.54(q) is already included in OM10.ID2, and including the commitment in the E-Plan establishes a robust barrier against the potential altering of the commitment at a later date. This change is being made to ensure that the E-Plan</p>

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	<p>modifying aspects of the Plan. In addition, telephone numbers referenced in the DCPD Emergency Plan Implementing Procedures (EPIPs) and the Nuclear Emergency Response Communications Directory (NERC) are reviewed quarterly to ensure up-to-date contact numbers and notification lists.</p> <p><u>Changes are made in accordance with 50.54(q) and a record of all changes to the Emergency Plan determined to reduce its effectiveness are retained for the life of the plant.</u></p>	<p>conforms to the regulations (50.54(t)(2); 50.54(q)(3); 50.54(q)(4); 50.54(q)(5); and 50.54(q)(6)). Therefore there is no impact on how the E-Plan meets the Planning Standards, Functions, or Elements.</p> <p>No additional evaluation necessary.</p>
<p>E-Plan Section 8.4.2</p> <p>This process requires review by the Plant Staff Review Committee (PSRC) and approval of the Site Vice President or Station Director.</p>	<p>E-Plan Section 8.4.2</p> <p>This process requires review by the Plant Staff Review Committee (PSRC) and approval of the <u>Vice President, Nuclear Generation</u> or Station Director.</p>	<p>Change #7 – Editorial change with no change of intent.</p> <p>SAPN 50831930 documents that revisions should be made to align DCPD procedures with the PG&E Leadership Team Organization changes, effective January 15, 2016. Specifically, Task 41 documents the need to review emergency planning documents for impact. Upon review, it was determined that Section 8 of the E-Plan should be revised to update the title of "Site Vice President." Under the new organization structure, the "Site Vice President" is now "Vice President, Nuclear Generation." This editorial correction updates the E-Plan to</p>

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		<p>ensure it remains technically accurate.</p> <p>No additional evaluation necessary.</p>
<p>E-Plan Section 8.6</p> <p>Local participating emergency organizations with which a letter-of-agreement has been signed will be contacted on an annual basis to certify continuing support of the agreement. Emergency support organizations that have an approved contract will be contacted prior to contract expiration. Contracts will be reviewed on an annual basis to ensure they are current.</p>	<p>E-Plan Section 8.6</p> <p><u>Written agreements are in place for local participating organizations that identify the emergency measures to be provided and when assistance will be requested (including during hostile actions). Letters-of-agreements, memorandum-of-understandings and legal documents contain, as a minimum; a description of responsibility, when the support or service will be provided, and how the support or service will be initiated.</u> Local participating emergency organizations with which a letter-of-agreement has been signed will be contacted on an annual basis to certify continuing support of the agreement. Emergency support organizations that have an approved contract will be contacted prior to contract expiration. Contracts will be reviewed on an annual basis to ensure they are current.</p>	<p>Change #8 – Process change with no change of intent.</p> <p>SAPN 50825573 was written to document the results of a conformance assessment performed by the Emergency Planning Licensing Basis Verification Project (EP LBVP). The conformance assessment was performed on the DCP E-Plan against NRC regulations, Regulatory Information Statements, RGs, Administrative Letters, Bulletins and Information Notices.</p> <p>This change addresses the recommendation documented in SAPN 50825573, Task 9. This change is being made to ensure that the E-Plan conforms to the regulations (50.47(b)(1) - A.3[2]; and 50.47(b)(2) - B.9.[4]). Therefore there is no impact on how the E-Plan meets the Planning Standards, Functions, or Elements.</p> <p>No additional evaluation necessary.</p>

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E-Plan Section 8.7.2 Other documents may include Emergency Procedures or Protocols from agencies such as:	E-Plan Section 8.7.2 Other documents may include Emergency Procedures or Protocols <u>from</u> agencies such as:	Change #9 – Editorial change with no change of intent. Corrected typing error – no change of intent. No additional evaluation necessary.