

October 19, 2016

PG&E Letter DCL-16-109
PG&E Letter DIL-16-017

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 Updates

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 Procedures EP EF-10, "Activation and Operation of the Joint Information Center," and EP RB-16, "Operating Instructions for the EARS Computer Program."

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 EP EF-10, Revision 17, "Activation and Operation of the Joint Information Center"
3	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-16, Revision 14, "Operating Instructions for the EARS Computer Program"

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. 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 any 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

Michael A. Ginn
Emergency Planning Manager

bnsn/4540/50873812/50872887

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)

Enclosure 1
PG&E Letter DCL-16-109
PG&E Letter DIL-16-017

**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*	14	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*	17	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 EP EF-10, Revision 17
Activation and Operation of the Joint Information Center

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-10, Revision 17

Original Content	Content Change	Change Number Type of Change Reason for Change
Step 3.7.1 Operating the computer and projector system used to display graphics and other information during media briefings.	Step 3.7.1 Operating the computer and <u>display</u> system used to <u>project graphics</u> and other information during media briefings.	Change #1 – Process change with no change of intent. The Joint Information Center (JIC) was recently updated with new equipment to enhance media briefing capabilities. Part of the update included replacing the projector with smart televisions (TVs) that display graphics via a HDMI cable. These changes were made based on Emergency Response Organization (ERO) feedback from multiple drills. Replacing "projector" with "display" aligns EP EF-10 with the current process. The functionality will still be provided as described in the Emergency Plan and no ERO responsibilities are being assigned or removed with this change. Graphics will continue to be projected by the News Media Liaison – Site as described in EP EF-10 and the Emergency Plan.

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 1, step 1.g.1) <u>IF</u> the PIO sends an APIO to the Incident Command Post (ICP), <u>THEN</u> the PIO will ensure the APIO uses EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 8.</p>	<p>Attachment 1, step 1.g.1) <u>IF</u> the PIO sends an APIO to the Incident Command Post (ICP), <u>THEN</u> the PIO will ensure the APIO uses EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 7.</p>	<p>Change #2 – Editorial change with no change of intent. The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. EP EF-11 is now in tab 7 – this change ensures the checklist is technically accurate.</p>
<p>Attachment 1, JIC Director Position Binder Tab Index Tab No. 7 "Nuclear Emergency Response Communications (NERC) Directory" Tab No. 8 EP EF-11, Operations of Alternate Emergency Response Facilities</p>	<p>Attachment 1, JIC Director Position Binder Tab Index Tab No. 7 EP EF-11, "<u>Alternate Emergency Response Facilities / Incident Command Post (ICP)</u>" Tab No. 8 "Nuclear Emergency Response Communications (NERC) Directory"</p>	<p>Change #3 – Editorial change with no change of intent. The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. Additionally, the title of EP EF-11 was updated to the current title – this ensures the procedure remains technically accurate.</p>
<p>Attachment 2, step 1.f.1) <u>IF</u> sending an APIO to the Incident Command Post (ICP), <u>THEN</u> ensure the APIO uses EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 6.</p>	<p>Attachment 2, step 1.f.1) <u>IF</u> sending an APIO to the Incident Command Post (ICP), <u>THEN</u> ensure the APIO uses EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 5.</p>	<p>Change #4 – Editorial change with no change of intent. The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. EP EF-11 is now in tab 5 – this change ensures the checklist is technically accurate.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 2, Note for step 1.g</p> <p>NOTE: The following list is not all inclusive. It contains typical information that should be included in a media release.</p>	<p>Note deleted.</p>	<p>Change #5 – Process change with no change of intent.</p> <p>SAPN DA 50861807 documents a JIC objective failure during the 6/29/16 team alpha full scope drill. The Work Group Evaluation (WGE) showed that the note for step 1.g may have led JIC personnel to include inappropriate information in media releases (i.e., protective action recommendations). This revision removes the erroneous note and restores original intent.</p>
<p>Attachment 2, Public Information Officer Checklist Position Binder Tab Index</p> <p>Tab No. 5</p> <p>"Nuclear Emergency Response Communications (NERC) Directory"</p> <p>Tab No. 6</p> <p>EP EF-11, Operations of Alternate Emergency Response Facilities</p>	<p>Attachment 2, Public Information Officer Checklist Position Binder Tab Index</p> <p>Tab No. 5</p> <p>EP EF-11, <u>"Alternate Emergency Response Facilities / Incident Command Post (ICP)"</u></p> <p>Tab No. 6</p> <p>"Nuclear Emergency Response Communications (NERC) Directory"</p>	<p>Change #6 – Editorial change with no change of intent.</p> <p>The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. Additionally, the title of EP EF-11 was updated to the current title – this ensures the procedure remains technically accurate.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 3, step 1.e.1) <u>IF</u> sent by the PIO to the Incident Command Post (ICP), <u>THEN</u> use EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 6.</p>	<p>Attachment 3, step 1.e.1) <u>IF</u> sent by the PIO to the Incident Command Post (ICP), <u>THEN</u> use EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 5.</p>	<p>Change #7 – Editorial change with no change of intent. The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. EP EF-11 is now in tab 5 – this change ensures the checklist is technically accurate.</p>
<p>Attachment 3, Assistant PIO - Position Binder Tab Index Tab No. 5 "Nuclear Emergency Response Communications (NERC) Directory" Tab No. 6 EP EF-11, Operations of Alternate Emergency Response Facilities</p>	<p>Attachment 3, Assistant PIO - Position Binder Tab Index Tab No. 5 EP EF-11, "<u>Alternate Emergency Response Facilities / Incident Command Post (ICP)</u>" Tab No. 6 "Nuclear Emergency Response Communications (NERC) Directory"</p>	<p>Change #8 – Editorial change with no change of intent. The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. Additionally, the title of EP EF-11 was updated to the current title – this ensures the procedure remains technically accurate.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 5, Step 1.c Ensure the following equipment is set up and operating in JIC media briefing area:</p> <ul style="list-style-type: none"> • Computer • Projector • Podium • Microphone system • Laser pointer • Flags 	<p>Attachment 5, Step 1.c Ensure the following equipment is set up and operating in JIC media briefing area:</p> <ul style="list-style-type: none"> • Computer • <u>Display</u> • Podium • Microphone system • Laser pointer • Flags 	<p>Change #9 – Process change with no change of intent.</p> <p>The JIC was recently updated with new equipment to enhance media briefing capabilities. Part of the update included replacing the projector with smart TVs that display graphics via a HDMI cable. These changes were made based on ERO feedback from multiple drills.</p> <p>Removing "projector" aligns EP EF-10 with the current process. Graphics will still be set up, displayed, and projected by the News Media Liaison – Site as described in EP EF-10 and the Emergency Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 5, Step 1.d</p> <p>Ensure that the PowerPoint slides on desktop and those in slide book (one is located in briefing area and one is located in work area conference room) are in consistent order.</p>	<p>Attachment 5, Step 1.d</p> <p>Ensure that the PowerPoint slides <u>in the J:\Emergency Planning\Joint Information Center (JIC) directory</u> and those in slide book (one is located in briefing area and one is located in work area conference room) are in consistent order.</p>	<p>Change #10 – Process change with no change of intent.</p> <p>SAPN 50817434, task 3, documents that the location of the slide deck should be changed from the desktop to the J:\drive. The JIC is a County facility, and is used for County training when not being used for drills. The JIC front trailer computer is not a dedicated ERO computer; therefore, it was determined that the slide deck should not be saved on the desktop. Changing the location of the slide deck to the shared drive (J:\drive) ensures that it is secure, but accessible to ERO personnel. If the network connection is lost, a hardcopy exists in the JIC that may be used as a backup. This revision is being made so that the news media liaison – site knows where to access the slide deck.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 5, Step 2.i</p> <p>Operate computer and projector system used during media briefings, if directed.</p>	<p>Attachment 5, Step 2.i</p> <p>Operate computer and <u>display</u> system used during media briefings, if directed.</p>	<p>Change #11 – Process change with no change of intent.</p> <p>The JIC was recently updated with new equipment to enhance media briefing capabilities. Part of the update included replacing the projector with smart TVs that display graphics via a HDMI cable. These changes were made based on ERO feedback from multiple drills. Replacing "projector" with "display" aligns EP EF-10 with the current process. Graphics will still be displayed/projected by the News Media Liaison – Site as described in EP EF-10 and the Emergency Plan.</p>
<p>Attachment 5, News Media Liaison – Site Position Binder Tab Index</p> <p>Tab No. 4</p> <p>EP EF-10, Form 69-21146, "News Media Liaison – Site Checklist"</p>	<p>Attachment 5, News Media Liaison – Site Position Binder Tab Index</p> <p>Tab No. 4</p> <p>EP EF-10, Form 69-21146, "News Media Liaison – <u>Corporate</u> Checklist"</p>	<p>Change #12 – Editorial change with no change of intent.</p> <p>SAPN 50817434, task 9, identifies that the Attachment 5 position binder index table needs to be updated to reflect that binder tab 4 contains the news media liaison – corporate checklist. The news media liaison – site checklist is held in tab 1.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 6, step 1.d <u>IF</u> sent by the PIO to the Incident Command Post (ICP) during a security event, <u>THEN</u> use EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 5.</p>	<p>Attachment 6, step 1.d <u>IF</u> sent by the PIO to the Incident Command Post (ICP) during a security event, <u>THEN</u> use EP EF-11, Form 69-21892, "ICP - Assistant Public Information Officer (APIO) Checklist." REFER TO Tab 4.</p>	<p>Change #13 – Editorial change with no change of intent. The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. EP EF-11 is now in tab 4 – this change ensures the checklist is technically accurate.</p>
<p>Attachment 6, Step 2.g Operate computer and projector system used for presentations and other information during media briefings.</p>	<p>Attachment 6, Step 2.g Operate computer and <u>display</u> system used for presentations and other information during media briefings.</p>	<p>Change #14 – Process change with no change of intent. The JIC was recently updated with new equipment to enhance media briefing capabilities. Part of the update included replacing the projector with smart TVs that display graphics via a HDMI cable. These changes were made based on ERO feedback from multiple drills. Replacing "projector" with "display" aligns EP EF-10 with the current process. Graphics will still be displayed/projected by the News Media Liaison – Site as described in EP EF-10 and the Emergency Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 6, News Media Liaison – Corporate Position Binder Tab Index Tab No. 4</p> <p>"Nuclear Emergency Response Communications (NERC) Directory" Tab No. 5</p> <p>EP EF-11, Operations of Alternate Emergency Response Facilities</p>	<p>Attachment 6, News Media Liaison – Corporate Position Binder Tab Index Tab No. 4</p> <p>EP EF-11, <u>"Alternate Emergency Response Facilities / Incident Command Post (ICP)"</u> Tab No. 5</p> <p>"Nuclear Emergency Response Communications (NERC) Directory"</p>	<p>Change #15 – Editorial change with no change of intent.</p> <p>The position binder tab index was reformatted so that the NERC is in the last tab. This is in alignment with the position binders in the JIC and other emergency facilities. Additionally, the title of EP EF-11 was updated to the current title – this ensures the procedure remains technically accurate.</p>
<p>Attachment 12, Step 5</p> <p>During the question and answer (Q&A) period, SLO county PIO and PG&E PIO take all questions from the media before handing them over to the appropriate company representative(s) to answer.</p>	<p>Attachment 12, Step 5</p> <p>During the question and answer (Q&A) period, SLO <u>C</u>ounty PIO and PG&E PIO take all questions from the media before handing them over to the appropriate company representative(s) to answer.</p>	<p>Change #16 – Editorial correction with no change of intent.</p> <p>Capitalized "County" to align with the rest of the procedure.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 13, Step 4</p> <p>After receiving approval, email using blind carbon copy (BCC) to DCPD External Update outlook group, Media Relations outlook group, and all email addresses in the external media excel spreadsheet located on the Emergency News Templates and Information Page of the EP Website at http://www.npgep/News/index.htm. Refer to NERC directory if fax numbers are needed.</p>	<p>Attachment 13, Step 4</p> <p>After receiving approval, email using blind carbon copy (BCC) to DCPD External Update outlook group, <u>Corporate Relations All Employees – No Contractors</u> outlook group, and all email addresses in the external media excel spreadsheet located on the Emergency News Templates and Information Page of the EP Website at http://www.npgep/News/index.htm. Refer to NERC directory if fax numbers are needed.</p>	<p>Change #17 – Process change with no change of intent.</p> <p>SAPN 50817434, task 7, documents that during the ERO training drill on 9/9/15, the media relations group was not able to be found in Outlook. Further investigation revealed that the correct name for the Outlook group is, "Corporate Relations All Employees – No Contractors." This EP EF-10 revision updates the Outlook group to ensure the procedure remains technically accurate.</p>

Enclosure 3
PG&E Letter DCL-16-109
PG&E Letter DIL-16-017

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP RB-16, Revision 14
Operating Instructions for the EARS Computer Program

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-16, Revision 14

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 2, Step 6. e. 4) Select accident type to <u>CONTAINMENT BYPASS RELEASE</u></p>	<p>Attachment 2, Step 6. e. 4) <u>IF</u> this is a Gas Decay Tank rupture release, <u>THEN</u> select accident type to <u>GAS DECAY TANK FAILURE</u>, <u>AND</u> go to Step 6. e. 8) below, <u>OTHERWISE</u> select accident type to <u>CONTAINMENT BYPASS RELEASE</u></p>	<p>Change #1 - Process change with no change of intent.</p> <p>Added clarifying information for the selection of the Gas Decay Tank source term when there is an auxiliary building radioactive release involving the rupture of a waste gas decay tank. There is no change of intent because the revised step is the correct wording that should have been in place to begin with. The incorrect wording was introduced in a previous revision and was not identified until now.</p> <p>The corrected source term selection aligns with the Final Safety Analysis Report (FSAR) which states that the waste gas decay tank rupture release is primarily noble gas; no iodine or particulate radioactivity per FSAR Chapter 11, TABLE 11.3-2 GASEOUS WASTE SYSTEM RELEASE: DESIGN BASIS CASE (CURIES).</p> <p>This does not change the dose assessment function. The change ensures the proper source term for a gas decay tank rupture dose assessment is selected.</p> <p>10 CFR 50.54(q) Effectiveness Evaluation 2016-27 documents the detailed analysis of this change.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 2, Step 6. e.</p> <p>5) Select the Core Condition</p> <ul style="list-style-type: none"> • NORMAL COOLANT (LOCA with RM-30/31 < 6 R/hr) 	<p>Attachment 2, Step 6. e.</p> <p>5) Select the Core Condition</p> <ul style="list-style-type: none"> • NORMAL COOLANT <ul style="list-style-type: none"> ○ <u>No</u> LOCA (Auxiliary building radioactive releases involving CVCS or ECCS leaks other than GDT rupture) ○ LOCA with RM-30/31 < 6 R/hr 	<p>Change #2 - Process change with change of intent.</p> <p>Added the “No LOCA” option to enhance guidance on how to select source term for auxiliary building radioactive releases involving chemical and volume control system (CVCS) or emergency core cooling system (ECCS) leaks (other than a waste gas decay tank rupture) during normal operation. Normal coolant is the applicable release source term in this scenario based on the assumption that the release is liquid reactor coolant system (RCS), which results in the release of a fraction of the particulate and iodine activity to atmosphere in addition to all the noble gas activity.</p> <p>10 CFR 50.54(q) Effectiveness Evaluation 2016-27 documents the detailed analysis of this change.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 2, Step 6. e.</p> <p>7) Select Aux Bldg. Filtration</p> <ul style="list-style-type: none"> • Unfiltered (check with the Control Room) • Filtered (check with the Control Room) 	<p>Attachment 2, Step 6. e.</p> <p>7) Select Aux Bldg. Filtration (check with the Control Room)</p> <ul style="list-style-type: none"> • Unfiltered • Filtered (always select for VCT and LHUT tank ruptures) 	<p>Change #3 - Process change with change of intent.</p> <p>Moved the direction to "check with the Control Room" to the higher level step, rather than stating it twice (editorial).</p> <p>Guidance to "always select (<i>filtered</i>) for VCT and LHUT tank ruptures" is being added to address the fractional release of particulate and iodine nuclides from the volume control tank and liquid hold up tanks as discussed in sections 15.5.25 (LHUT) and 15.5.26 (VCT) of the FSAR. To create the appropriate aux building atmospheric release source term, 99% of the iodines and particulates need to be removed from the RCS source term. This is due to the chemical and physical attenuation of the iodine nuclides in the water of the volume control tank and liquid holdup tanks after the rupture occurs. Auxiliary building normal filtration includes HEPA filtration which for the purpose of this calculation is conservatively 99% efficient for removal for particulate radioactivity. This iodine and particulate reduction in the release source term is accomplished by selecting the "filtered" option, regardless if iodine removal mode is initiated.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
Continued	Continued	<p>15.5.25 RADIOLOGICAL CONSEQUENCES OF A RUPTURE OF A LIQUID HOLDUP TANK In the evaluation of the liquid waste holdup tank rupture accident, the following fission product accumulation and release assumptions are used for the <u>design basis case</u>: (4) All of the noble gases and <u>varying amounts of the iodines</u> are released from the auxiliary building vault to the auxiliary building atmosphere.</p> <p>15.5.26 RADIOLOGICAL CONSEQUENCES OF A RUPTURE OF A VOLUME CONTROL TANK In the evaluation of the volume control tank rupture accident, the following fission product accumulation and release assumptions are used for the design basis case: (3) All of the noble gases and <u>10E-4 of the iodines</u> are <u>released from the containment vault to the auxiliary building atmosphere</u>.</p> <p>10 CFR 50.54(q) Effectiveness Evaluation 2016-27 documents the detailed analysis of this change.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 2</p> <p>7. Adjust the "Remaining Duration" time <u>when</u>:</p> <p>a. The accident condition dictates a shorter or longer plume release duration than 3 hours.</p> <p>1) <u>OBTAIN</u> the projected release duration or stop time from the bridge line.</p>	<p>Attachment 2</p> <p>7. Adjust the "Remaining Duration" time <u>when</u>:</p> <p>a. The accident condition dictates a shorter or longer plume release duration than 3 hours.</p> <p>1) Enter 0.5 hour for a Gas Decay Tank, Volume Control Tank, or LHUT tank rupture.</p> <p>2) <u>OBTAIN</u> the projected release duration or release stop time from the bridge line.</p>	<p>Change # 4 - Process change with change of intent.</p> <p>Added instruction to use a default of 0.5 hour release for tank ruptures, because a 3 hour release is not valid for a tank rupture.</p> <p>FSAR section 15.5.5 states that, "release duration for liquid holdup tank rupture, gas decay tank rupture, volume control tank rupture, and fuel handling area accident are all over in 10 minutes."</p> <p>FSAR sections 15.5.24 (GDT), 15.5.25 (LHUT), and 15.5.26 (VCT) assume all activity is released from the auxiliary building to the environment in 2 hours.</p> <p>The release duration of 0.5 hours for a tank rupture may slightly overestimate the dose depending on when the dose assessment run is started. However, using a MIDAS input of 0.5 hour release duration captures the peak activity from the total tank release (<10 minutes) assumed in the FSAR for a GDT, LHUT, or VCT rupture and provides a reasonable release duration to capture the entire activity released over a 2 hour period of time.</p> <p>10 CFR 50.54(q) Effectiveness Evaluation 2016-27 documents the detailed analysis of this change.</p>