



September 12, 2019

PG&E Letter DCL-19-068
PG&E Letter DIL-19-010

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 the requirements of 10 CFR 50.54(q)(5) and 10 CFR 72.32, Pacific Gas and Electric Company (PG&E) hereby provides a summary of the analysis of changes to Emergency Plan (E-Plan) Implementing Procedure EP G-1, Revision 46, "Emergency Classification and Emergency Plan Activation."

The associated enclosures are listed below:

- Enclosure 1 - Diablo Canyon Power Plant Emergency Plan Implementing Procedures, Revision Numbers for Emergency Plan Implementing Procedures.
- Enclosure 2 - Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-1, Revision 46, "Emergency Classification and Emergency Plan Activation."

PG&E evaluated the changes per the requirements of 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 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 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,

A handwritten signature in black ink, appearing to read 'm e A G' followed by a horizontal line.

Michael A. Ginn
Emergency Planning Manager

armb/4743/51041151

Enclosures

cc/enc: William C. Allen, NMSS Project Manager
Scott A. Morris, 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-19-068
PG&E Letter DIL-19-010

**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	18	Maintaining Emergency Preparedness
OM10.DC1	10	Emergency Preparedness Drills and Exercises
EP G-1	46*	Emergency Classification and Emergency Plan Activation
EP G-2	53	Interim Emergency Response Organization
EP G-3	60	Emergency Notification of Off-Site Agencies
EP G-4	30	Assembly and Accountability
EP G-5	16	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	9	Stable Iodine Thyroid Blocking
EP RB-4	6	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	9	Alternate Personnel Decontamination Facilities
EP RB-8	29	Instructions for Field Monitoring Teams
EP RB-10	21	Protective Action Recommendations
EP RB-12	12	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	11	Core Damage Assessment Procedure
EP RB-14A	3	Initial Detection of Fuel Cladding Damage
EP RB-15	16	Post Accident Sampling System
EP RB-16	16	Operating Instructions for the EARS Computer Program
EP RB-17	2	Operating Instructions for QuickDose
EP R-2	37	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	9	Release of Radioactive Liquids
EP R-7	19	Off-Site Transportation Accidents
EP EF-1	57	Activation and Operation of the Technical Support Center
EP EF-2	41	Activation and Operation of the Operational Support Center
EP EF-3	48	Activation and Operation of the Emergency Operations Facility
EP EF-4	22	Activation of the Off-Site Emergency Laboratory
EP EF-9	13	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 G-1, Revision 46
“Emergency Classification and Emergency Plan Activation.”**

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
1	<p>1.2.1</p> <p>Emergency classification is based on EAL initiating conditions and EAL thresholds using this procedure, a controlled EAL wall chart and, as needed, the Emergency Plan, Appendix D (Emergency Action Level Technical Basis Manual).</p>	<p>1.2.1</p> <p>Emergency classification is based on EAL initiating conditions (ICs) and Emergency Action Level (EAL) thresholds using this procedure, a controlled EAL wall chart and, as needed, the Emergency Plan, Appendix D (Emergency Action Level Technical Basis Manual).</p>	<p>Modified content.</p> <p>Added in acronym for initiating conditions and spelled out EAL acronym.</p> <p>No change in procedure actions.</p> <p>This change does not affect how the current Emergency Plan (E-Plan) meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
2	<p>2.4</p> <p>Definitions of terms associated with EALs are contained in the Plant Manual, Volume 11, Emergency Plan, Appendix D "Introduction" section. Controlled copies of the Emergency Plan, Appendix D (Emergency Action Level Technical Basis Manual) are located in every Emergency Response Facility (ERF).</p>	<p>2.4</p> <p>Definitions of terms associated with EALs are contained in the Plant Manual, Volume 11, Emergency Plan, Appendix D. Controlled copies of the Emergency Plan, Appendix D (Emergency Action Level Technical Basis Manual) are located in every Emergency Response Facility (ERF).</p>	<p>Modified content.</p> <p>Updated the reference to Appendix D to remove the "introduction" section as the recently revised Appendix D does not include the definitions in the introduction section; the definitions are now in their own section in Appendix D.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
3	<p>3.1</p> <p>Shift Manager (SM): Control Room Shift Manager is responsible for initial event classification and emergency plan activation. The SM may upgrade the event classification until relieved by either the SEC or ED. In addition, the SM may downgrade an UE to no ECL.</p>	<p>3.1</p> <p>Shift Manager (SM): Control Room Shift Manager is responsible for initial event classification and emergency plan activation. The SM may upgrade the event classification until relieved by either the SEC or ED. In addition, the SM may downgrade an Unusual Event (UE) to no Emergency Classification Level (ECL).</p>	<p>Modified content.</p> <p>Spelled out acronyms UE and ECL.</p> <p>No change in procedure actions.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
4	<p>3.2</p> <p>Site Emergency Coordinator (SEC): The SEC may upgrade the classification of an event until relieved by the Emergency Director.</p>	<p>3.2</p> <p>Site Emergency Coordinator (SEC): The SEC may upgrade the classification of an event until relieved by the Emergency Director (ED).</p>	<p>Modified content.</p> <p>Added ED acronym after Emergency Director.</p> <p>No change in procedure actions.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
5	<p>N/A – added new content.</p>	<p>5.3.1d.</p> <p>The delay did not deny the Offsite Response Organizations (OROs) the opportunity to implement actions to protect the public health and safety.</p>	<p>Modified content.</p> <p>Added in new sub-step to align with Interim Staff Guidance NSIR/DPR-ISG-01.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
6	<p>6.1.1 Assess and classify the event by referring to the appropriate EAL wall charts and/or EAL Technical Basis Manual to determine the Emergency Classification Level (ECL).</p> <p>a. Reviewing EALs:</p> <p>1. Review EAL thresholds on EAL wall charts from top to bottom, left to right (highest to lowest).</p> <p>N/A – added new content</p>	<p>6.1.1 Assess and classify the event by referring to the appropriate EAL wall charts and EAL Technical Basis Manual to determine the Emergency Classification Level (ECL)</p> <p>a. Reviewing EALs:</p> <p>1. Using placekeeping, review EAL thresholds on all EAL wall charts from top to bottom, left to right (highest to lowest).</p> <p>2. Read every word and applicable note.</p>	<p>Modified content.</p> <p>Replaced “and/or” with “and” to clarify expectation that the Technical Basis Manual is referred to.</p> <p>Added in human performance tool standards.</p> <p>This change does not alter the assignment of responsibility or any timeliness aspects associated with emergency classification. This change captures current human performance tool usage in EP G-1 to provide a clear standard for the Emergency</p>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
			<p>Response Organization (ERO).</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
7	N/A – added new content.	<p>6.3</p> <p>NOTE 1: Downgrades in emergency classification level have no time requirements.</p> <p>NOTE 2: When the reason for the highest classification is cleared, many of the lower conditions may still exist.</p>	<p>Added content.</p> <p>New guidance was added to EP G-1 specific to event downgrades.</p> <p>These two notes do not alter the assignment of responsibility or any timeliness aspects associated with emergency classification or emergency recovery.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change								
8	N/A – added new content.	<p>6.3 Terminating or Downgrading an Emergency Classification Level (ECL)</p> <p>6.3.1 The following approach to terminating or downgrading an ECL is recommended:</p> <table><tr><th>Emergency Classification Level</th><th>Action When Condition no Longer Exists</th></tr><tr><td>UNUSUAL EVENT</td><td>Terminate the emergency per EP G-2</td></tr><tr><td>ALERT or SITE AREA EMERGENCY without long-term plant damage*</td><td>Terminate the emergency if no Initiating Conditions (ICs) or EALs are met, and enter recovery per EP OR-3 OR Downgrade based on conditions being stable and at least one lower Initiating Condition (IC) and EAL being met</td></tr><tr><td>ALERT or SITE AREA EMERGENCY with long-term plant damage*</td><td>Terminate the emergency if no Initiating Conditions (ICs) or EALs are met, and enter recovery per EP OR-3</td></tr></table>	Emergency Classification Level	Action When Condition no Longer Exists	UNUSUAL EVENT	Terminate the emergency per EP G-2	ALERT or SITE AREA EMERGENCY without long-term plant damage*	Terminate the emergency if no Initiating Conditions (ICs) or EALs are met, and enter recovery per EP OR-3 OR Downgrade based on conditions being stable and at least one lower Initiating Condition (IC) and EAL being met	ALERT or SITE AREA EMERGENCY with long-term plant damage*	Terminate the emergency if no Initiating Conditions (ICs) or EALs are met, and enter recovery per EP OR-3	<p>Added content.</p> <p>New guidance was added to EP G-1 specific to event downgrades.</p> <p>This change adds additional instructions for the ERO on event downgrading. The content for this change was taken from NEI 99-01 Revision 6 (Section 5.6, page 24).</p> <p>This change was evaluated in 50.54(q) 2019-27.</p>
Emergency Classification Level	Action When Condition no Longer Exists										
UNUSUAL EVENT	Terminate the emergency per EP G-2										
ALERT or SITE AREA EMERGENCY without long-term plant damage*	Terminate the emergency if no Initiating Conditions (ICs) or EALs are met, and enter recovery per EP OR-3 OR Downgrade based on conditions being stable and at least one lower Initiating Condition (IC) and EAL being met										
ALERT or SITE AREA EMERGENCY with long-term plant damage*	Terminate the emergency if no Initiating Conditions (ICs) or EALs are met, and enter recovery per EP OR-3										

Change	Original Content (Revision 45)	Revised Content (Revision 46)		Description of Change
		<div>GENERAL EMERGENCY</div>	<div>Terminate the emergency if no Initiating Conditions (ICs) or EALs are met, and enter recovery per EP OR-3</div>	
		<div>*Examples of long-term plant damage (not all inclusive):<ul style="list-style-type: none">Fuel damage greater than Technical Specification limitsLoss of any fission product barrierAny valid CSFST RED path was met during the eventAny event which requires the plant to be placed in safe shutdown or as part of the event the plant entered safe shutdown</div>		
9	<div>6.3.2</div> <div>The SM may downgrade an UE to no ECL.</div> <div>N/A – added new content</div>	<div>6.3.2</div> <div>The SM should terminate a UE to no ECL per EP G-2, Attachment 7 (Form 69-21273), "Guidelines for Terminating an Unusual Event."</div> <div>a. IF the ERO was staffed at the UE level, THEN the SEC or ED may terminate the event with SM concurrence.</div> <div>b. DCPD may terminate from the Unusual Event classification level without County, State and NRC consultation.</div>		<div>Modified content.</div> <div>Updated the language in the step to align with the new termination instructions added in other changes under this revision.</div> <div>Changed “downgrade” to “terminate” as terminating is the correct action from a UE.</div> <div>Sub-step a. was added to address the condition in which the SM decided to call-out the ERO at the UE level and the SEC or ED is available and has command and control (this is an existing process). In this scenario, it would be appropriate for the individual with command and control to terminate the event when all termination criteria were satisfied; including SM concurrence that the event</div>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
			<p>should be terminated.</p> <p>Sub-step b. was added to align EP G-1 with E-Plan Appendix G Section 2.3.2.b. which states, "DCPP may terminate from the Unusual Event classification level without ORO consultation."</p> <p>This change does not alter the assignment of responsibility or any timeliness aspects associated with emergency classification or emergency recovery.</p> <p>This change continues to provide for an orderly transition, including coordination with offsite response organizations (OROs), to a recovery organization for the spectrum of accident scenarios within the Diablo Canyon Power Plant (DCPP) E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
10	<p>6.3.1</p> <p>The SM and SEC shall not downgrade from an ALERT or higher emergency classification level at any time.</p> <p>6.3.3</p> <p>Only the Emergency Director may downgrade from an ALERT or higher ECL according to the most current controlling EAL.</p>	<p>6.3.3</p> <p>Only the ED shall terminate or downgrade from an ALERT or higher emergency classification level.</p>	<p>Modified content.</p> <p>Combined two steps and re-worded them into a positive statement. The intent remains unchanged; the ED downgrades or terminates from an Alert or higher ECL.</p> <p>This change does not alter the assignment of responsibility or any timeliness aspects associated with emergency classification or emergency recovery.</p>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
			<p>This change continues to provide for an orderly transition, including coordination with OROs, to a recovery organization for the spectrum of accident scenarios within the DCCP E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
11	N/A – added new content	<p>6.3.3</p> <p>a. Terminate from an ALERT or higher as follows:</p> <p>1. Ensure:</p> <p>a) No EALs are currently declarable per appropriate EAL wall charts and EAL Technical Basis Manual.</p> <p>1) Using placekeeping, review EAL thresholds on all EAL wall charts from top to bottom, left to right (highest to lowest).</p> <p>2) Read every word and applicable note.</p> <p>3) Refer to the Emergency Plan, Appendix D (Emergency Action Level Technical Basis Manual), if needed, for a more detailed explanation of each EAL and threshold basis.</p> <p>b) No new plume phase PARs are required or expected.</p> <p>c) Radioactive releases do not exceed and</p>	<p>Added content.</p> <p>Added the EAL determination process instructions from Section 6.1.1 to ensure the ERO uses the same methods and tools for event termination as they do for event upgrades.</p> <p>Added guidance to EP G-1 for event termination from existing E-Plan implementing procedure language in EP OR-3, Attachment 1. Additional steps were also added to direct notification of OROs per existing procedure guidance in EP G-3.</p> <p>This change enhances termination instructions in EP G-1 and aligns EP G-1 with other E-Plan implementing procedures and E-Plan Section 9 for event termination.</p> <p>This change does not alter the assignment of responsibility or any timeliness aspects associated with emergency classification, termination, recovery, or notifications.</p>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
		<p>are not expected to exceed Tech Specs without dispensation from the NRC.</p> <p>d) Radiation levels in the plant are not expected to preclude reaching and maintaining a stable operating mode, such as cold shutdown.</p> <p>e) The plant may be brought to and maintained at a stable operating mode, such as cold shutdown.</p> <p>f) Any external emergency cause (fire, flood, earthquake, storm/hurricane, tsunami, or security challenge) has eased and is no longer expected to threaten plant safety.</p> <p>2. Obtain concurrence from County, State and NRC authorities prior to terminating from an event at an Alert or higher emergency classification level.</p> <p>3. Once the decision to terminate the emergency has been made:</p> <p>a) Make a clear announcement to the EOF staff.</p> <p>b) Prepare an expedited Follow-Up Emergency Notification for the termination of the emergency per EP G-3, Attachment 4 (Form 69-21638).</p> <p>c) Go to EP OR-3, "Emergency Recovery" for additional actions.</p>	<p>This change continues to provide for an orderly transition, including coordination with OROs, to a recovery organization for the spectrum of accident scenarios within the DCP E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
12	N/A – added new content	<p>6.3.3</p> <p>b. Downgrade from an ALERT or SITE AREA</p>	<p>Added content.</p> <p>Added the EAL determination process</p>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
		<p>EMERGENCY without long term plant damage as follows:</p> <p>1. Assess and classify an event downgrade by referring to the appropriate EAL wall charts and EAL Technical Basis Manual to determine the highest applicable Emergency Classification Level (ECL).</p> <p>a) Using placekeeping, review EAL thresholds on all EAL wall charts from top to bottom, left to right (highest to lowest).</p> <p>b) Read every word and applicable note.</p> <p>c) Refer to the Emergency Plan, Appendix D (Emergency Action Level Technical Basis Manual), if needed, for a more detailed explanation of each EAL and threshold basis.</p> <p>d) IF a fission product barrier was potentially lost, AND conditions change resulting in the applicable potential loss criteria no longer being met, THEN request an analysis from engineering to provide a basis for fission product barrier integrity prior to changing the fission product barrier status.</p> <p>1) The basis may include use of available plant indications, sample results, or calculations.</p> <p>2. IF an EAL threshold is determined to still be exceeded, AND event downgrade is preferred over event termination, THEN:</p>	<p>instructions from Section 6.1.1 to ensure the ERO uses the same methods and tools for event downgrades as they do for event upgrades.</p> <p>New guidance was added to EP G-1 specific to event downgrades.</p> <p>This change does not alter the assignment of responsibility or any timeliness aspects associated with emergency classification. This change captures current human performance tool usage in EP G-1 to provide a clear standard for the ERO.</p> <p>There is no current E-Plan requirement or guidance for how to restore fission product barriers. There are no regulations or regulatory guidance currently available that prescribe an acceptable method for restoring fission product barriers. The content of this step was developed based on DCPD operating philosophy to engage engineering to establish a basis for restoring a barrier based on available indications, sample results, or calculations.</p> <p>This change was evaluated in 50.54(q) 2019-27.</p>

Change	Original Content (Revision 45)	Revised Content (Revision 46)	Description of Change
		<p>a) Check MODE applicability.</p> <p>b) Note the new EAL number.</p> <p>c) Have the downgrade classification independently checked.</p> <p>3. Make a verbal declaration of the downgrade classification to the team members using the "Update" method.</p> <p>4. Prepare an Initial Emergency Notification for the downgraded classification per EP G-3, Attachment 3 (Form 69-20596).</p>	
13	<p>7. Records</p> <p>None</p>	<p>7. Records</p> <p>7.1 Documents generated by this procedure during drills are non-quality good business records and are maintained per OM10.ID1, "Maintaining Emergency Preparedness."</p> <p>7.2 Documents generated by this procedure during actual events are quality records and shall be maintained per AD10.ID1, "Storage and Control of Quality Assurance Records."</p>	<p>Added content.</p> <p>Added records requirements to align EP G-1 with other E-Plan implementing procedures. This change also aligns EP G-1 with DCPP records retention requirements.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>