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## PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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June 4, 1982

Mr. Darrell G. Eisenhut, Director  
Division of Reactor Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Docket No. 50-275  
License No. DPR-76  
Diablo Canyon Unit 1

Dear Mr. Eisenhut:

In accordance with NRC Generic Letter No. 82-10 (Post TMI Requirements), PG&E is submitting the requested information for NUREG-0737 items. However, specific schedules for items I.C.1 and III.A.1.2 are not submitted at this time as we understand the Commission is to consider a revised implementation schedule for these NUREG-0737 items under SECY 82-111, "Requirements for Emergency Response Capabilities." We will provide the required information for these items in accordance with the approved SECY 82-111.

Our submittal consists of Enclosure A, "Items Which Have Been Completed," and Enclosure B, "Items Which Have Not Been Completed."

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

I am authorized to sign and file this submittal with the NRC, and the matters set forth herein are true and correct to the best of my knowledge and belief.

Very truly yours,

J. O. SCHUYLER

J. O. Schuyler

DS03

Mr. Darrell G. Eisenhut

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Subscribed and sworn to before me this 4th day of June, 1982.

SEAL

Nancy J. Lemaster

Nancy J. Lemaster, Notary Public  
in and for the City and County of  
San Francisco, State of California

My Commission expires April 14, 1986

Robert Chlbach  
Philip A. Crane, Jr.  
Attorneys for Pacific  
Gas and Electric Company

By Philip A. Crane, Jr.  
Philip A. Crane, Jr.

E.R.Kendle/PAC:nl

Enclosures

cc w/encls:

Mr. R. H. Engelken, Regional Administrator  
Region V

U. S. Nuclear Regulatory Commission  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596

Service List

ENCLOSURE A

ITEMS WHICH HAVE BEEN COMPLETED

<u>NUREG-0737 Item</u>	<u>NRC Requirement</u>	<u>NRC Recommended Schedule</u>	<u>PG&amp;E Status</u>
I.A.1.3.1 Limit Overtime	Revise administrative procedures to limit overtime in accordance with NRC Policy Statement issued by Generic Letter No. 82-02, dated February 8, 1982.	October 1, 1982	Nuclear Plant Administrative Procedure NPAP A-8 was revised 2/23/81 to meet this requirement.
I.A.1.3.2 Minimum Shift Crew	Augment current shift staffing to conform with minimum levels set forth on page 3-9 of NUREG-0737.	July 1, 1982	Nuclear Plant Administrative Procedure NPAP A-104 was revised 5/13/80 and PG&E had sufficient licensed operators by 6/2/81 to meet this requirement.
II.D.1.2 RV & SV Test Programs	Submit plant specific reports on relief and safety valve program.	April 1, 1982	The plant specific report on the relief and safety valve program was submitted on 3/31/82.
III.A.1.2 Staffing Levels for Emergency Situations	Provide for augmentation of staffing in accordance with Generic Letter 81-10 dated 2/18/81.	July 1, 1982	Completion of this requirement confirmed in SER Supplement 14, April, 1981.
III.D.3.4 Control Room Habitability	Modify facility as identified by licensee study.	Plant Specific Proposals	Licensee study found that no design changes were needed (9/3/80) and confirmed by SER Supplement No. 14.

ENCLOSURE B

ITEMS WHICH HAVE NOT BEEN COMPLETED

<u>NUREG-0737 Items</u>	<u>NRC Requirement</u>	<u>NRC Recommended Schedule</u>	<u>PG&amp;E Proposed Schedule</u>
I.C.1 Revise Emergency Procedures	Revise procedures by next refueling outage.	First refueling after 10/1/82.	Will be established in accordance with "Staff Recommendations on the Requirements for Emergency Response Capability" (SECY 82-111) when approved.*
II.D.1.3 Block Valve Test Program	Submit report of results of test program.	July 1, 1982	July 1, 1982
II.K.3.30 & 31 SB LOCA Analysis	Submit plant specific analyses.	One year after staff approval of model.	One year after staff approval of model.
III.A.1.2 Upgrade Emergency Support Facilities	Complete modifications.	October 1, 1982	Will be established in accordance with "Staff Recommendations on the Requirements for Emergency Response Capability" (SECY 82-111) when approved.**
III.A.2.2 Meteorological Data	Complete modifications.	October 1, 1982	October 1, 1982

\*Emergency Procedures are to be revised in accordance with Westinghouse Owner's Group generic guidelines which are not yet available. PG&E personnel required to prepare revised emergency procedures are the same as those required to perform Control Room design review and development of safety parameter display system displays. Time is needed to integrate the schedules for implementation of these and other emergency response capabilities after approval of staff requirements (SECY 82-111). Existing emergency operating procedures have been upgraded to address the most significant emergency conditions. These upgraded procedures have been reviewed by NRC staff and, as revised in accordance with staff recommendations, were found to be acceptable for operation up to 100% of rated power.

\*\*PG&E has provided an interim EOF which was scheduled to be upgraded with new data systems equipment to meet the requirements of NUREG 0737 by October 1, 1982; however, the Emergency Response Facilities Data Systems equipment supplier recently informed us of a delay in shipment from July 15, 1982 to September 15, 1982. This delay will not allow us to meet the recommended NRC schedule of October 1, 1982. Also, time is needed to integrate the schedules for implementation of these and other emergency response capabilities after approval of staff requirements (SECY 82-111). We are currently negotiating the shipping date with the vendor and when established will provide a proposed schedule to the NRC. In addition, PG&E will provide a permanent EOF. Our letter dated December 20, 1981 to D.G. Eisenhower states the permanent EOF will be complete by July 1, 1982. With the construction contract recently awarded, we now believe this date may be revised to October 1, 1983. The permanent EOF schedule will also be finalized when we provide our proposed schedule for the upgraded facility. (We plan to request a license amendment and negotiation of schedules upon Commission approval of SECY 82-111.)