

# Diablo Canyon Power Plant

License Amendment Request to Revise the Emergency Plan  
for Post-Shutdown and Permanently Defueled Condition  
Pre-Submittal Meeting

Presented by

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# Meeting Purpose

**Provide preliminary information regarding a proposed License Amendment Request (LAR) to revise the Diablo Canyon Power Plant (DCPP) Units 1 and 2 Emergency Plan to reflect a permanently shutdown and defueled condition**

- Termed the Post-Shutdown Emergency Plan (PSEP)
- The proposed changes continue to demonstrate PG&E's commitment and responsibility to protect the health and safety of our workforce, our communities, and the environment



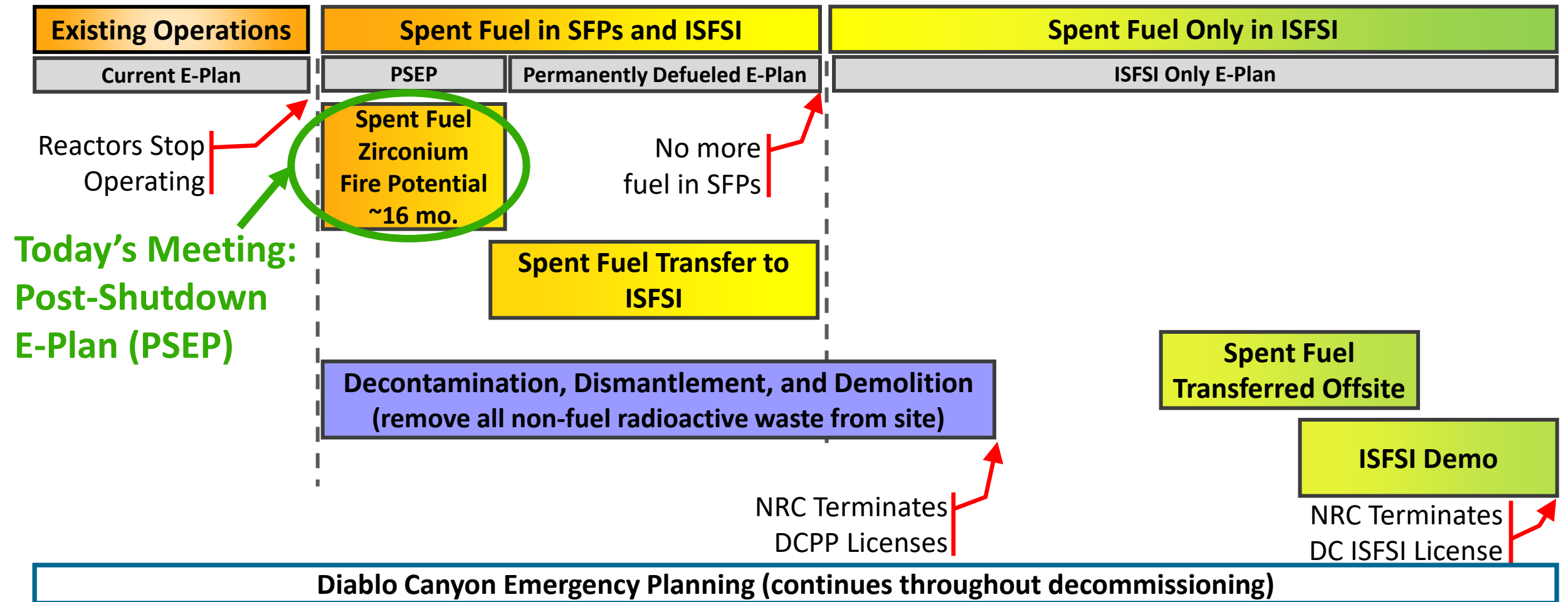


# DCPP Decommissioning Planning

- **On November 27, 2018, PG&E notified the NRC of the intent to permanently cease operations at DCPP Units 1 and 2 upon expiration of the operating licenses**
  - DCPP Unit 1 license expires November 2, 2024
  - DCPP Unit 2 license expires August 26, 2025
- **PG&E is currently working on decommissioning planning activities necessary to support direct transition to decommissioning upon permanent cessation of operations**
  - Including submittal of LARs to support decommissioning

# Background for E-Plan Transitions

## What changes during decommissioning?



# E-Plan Transitions

- **Consistent with the 2016 Joint Proposal Settlement Agreement Commitments**

- Agreement between PG&E and stakeholders
- Reflected in PG&E's 2018 funding request to the California Public Utilities Commission



“PG&E will continue to support the funding of warning sirens and local emergency planning during the decommissioning period until all spent fuel is in dry cask storage and the two nuclear reactors are fully decommissioned... Additionally, the settlement ensures that PG&E’s spending on its own emergency response personnel throughout the entire decommissioning period will be appropriately based upon the risks at each phase of the process and retains the Commission’s discretion to review the specific levels of funding for PG&E staff and equipment as part of the Commission’s future review of Diablo Canyon’s site-specific decommissioning plan.”

# Conditions for Implementation

- **The proposed changes will not be applicable until permanent cessation of operations and once the following conditions have been met for DCPD Units 1 and 2:**
  - Docketing of the certifications required by 10 CFR 50.82(a)(1) (i and ii) for DCPD Units 1 and 2 (i.e., permanent fuel removal from reactors)
  - The DCPD Permanently Defueled Technical Specifications have become effective (submitted in December 2020 for NRC review)

# Overview of Proposed PSEP LAR

- **LAR Outline**
  - Enclosure 1, Evaluation of Proposed Changes
    - Attachment 1: Tabular Summary of Proposed Changes to the Site Emergency Plan
    - Attachment 2: Proposed Revision to Site Emergency Plan – Markup
    - Attachment 3: Proposed Revision to Site Emergency Plan – Clean
    - Attachment 4: Emergency Response Organization Task Analysis
    - Attachment 5: Offsite Response Organization Concurrence
  - Enclosure 2, Supplemental Actions
- **Aligns with recent industry precedent for content and emergency response organization (ERO) staffing reductions**
  - Pilgrim Nuclear Power Station
  - Three Mile Island Nuclear Station
  - Indian Point Nuclear Generating Station





# Overview of Proposed PSEP

- **Transition from operational on-shift staff to decommissioning**
  - 22 (existing) → 12 (proposed)
    - Supported by On-Shift Staffing Assessment using NEI 10-05 methodology
    - Reflects the reduced spectrum of accidents

<u>Operational On-Shift Staff</u>	<u>Post Shutdown Decommissioning On-Shift Staff (Phase 1)</u>
• (1) Shift Manager	• (1) Shift Supervisor* (qualified as a CFH)
• (2) Unit Shift Supervisors	
• (4) Control Room Operators	• (1) Certified Fuel Handler (CFH)
• (5) Non-Licensed Operators	• (3) Non-Certified Operators (NCOs)
• (2) Shift Phone Talkers	
• (2) RP Technicians	• (2) RP Technicians
• (1) Work Control Shift Foreman	
• (5) Fire Department	• (5) Fire Department personnel per the Fire Protection Program
• Personnel per Security Plan	• Security personnel per the Security Plan
<b>Total = 22</b>	<b>Total = 12</b>

\* re-named from Shift Manager



# Overview of Proposed PSEP

- **ERO staffing transition**
  - Modified staffing numbers at all Emergency Response Facilities (ERFs)
    - Supported by an ERO Task Analysis
    - Staffing levels maintains the ability for:
      - PG&E to interface with the State or County
      - State and County response organizations to implement the Radiological Emergency Plans
    - Reflects the reduced spectrum of potential accidents
  - Key ERO changes:
    - RP: 6 (existing) → 2 (proposed; 1 for radiological assessment, 1 in-plant protective actions)
    - Field Monitoring Teams (1 RP & 1 driver): 3 teams (existing) → 2 teams (proposed; 1 offsite, 1 onsite)

# Overview of Proposed PSEP

- **Remove systems and components associated with an operating reactor**
- **Remove Emergency Response Data System (ERDS)**
  - No longer required to provide hardware to interface with the NRC receiving system
    - Maintain capability for continuous NRC communications
- **Supplemental Action**
  - Consistent with industry precedent: PG&E will conduct a drill prior to implementation of the PSEP to confirm ability:

*DCPP will perform a drill to confirm the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility and to utilize the post-shutdown procedures being developed depicting the revised assignment of duties. State and local response organizations will be offered the opportunity to participate, and the NRC and FEMA will be provided advance notice and the opportunity to observe drill activities.*

# Overview of Proposed PSEP

## Items that are not proposed for change in the PSEP:

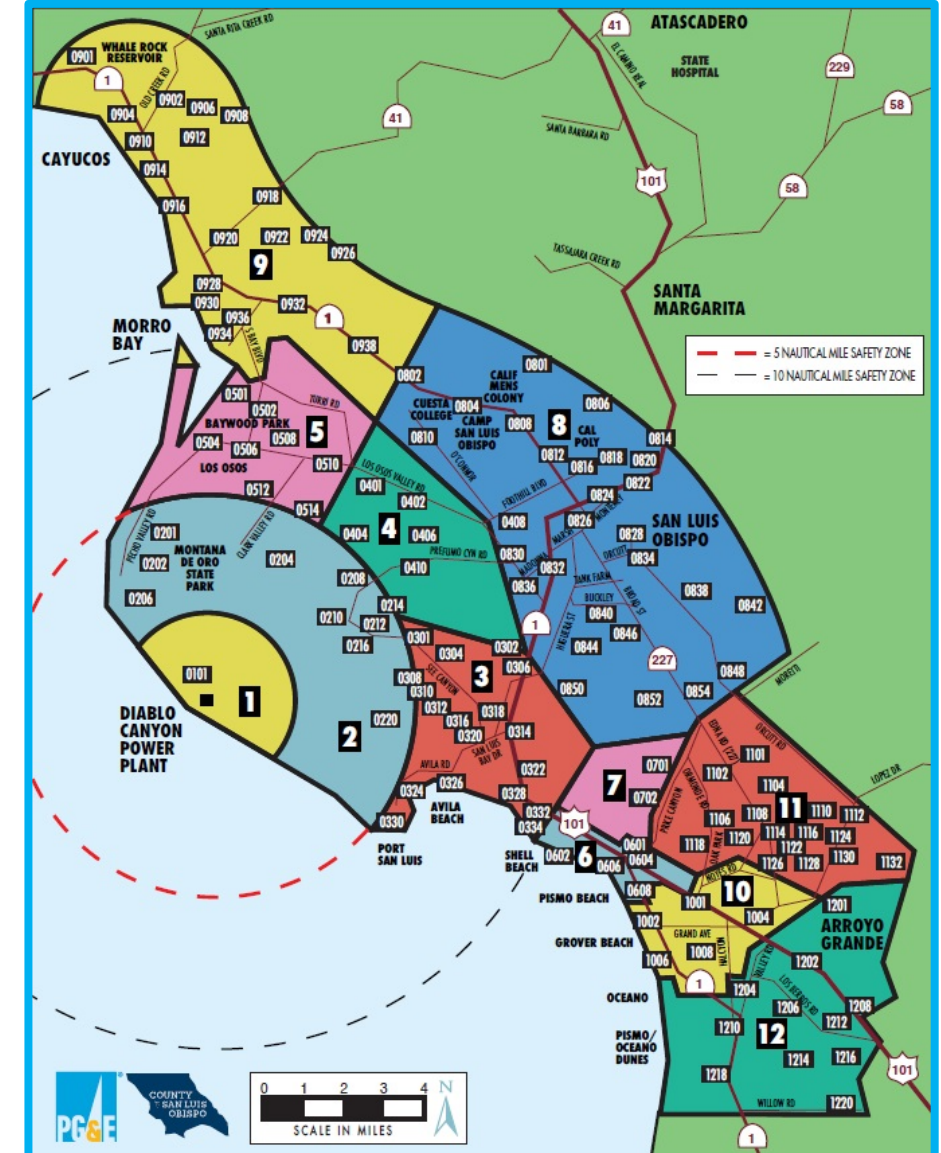
- Emergency Response Facilities (ERFs): will use existing ERFs
  - Technical Support Center (TSC)
  - Operations Support Center (OSC)
  - Emergency Operations Facility (EOF)
  - Joint Information Center (JIC)
- Emergency Classification Levels (ECLs): no changes from unusual event, alert, site area emergency, and general emergency
- Emergency Action Levels (EALs): no changes



# Overview of Proposed PSEP

## Items that are not proposed for change (continued):

- Emergency Response Organization (ERO) response times: no changes for remaining positions
- Offsite equipment
- Emergency Planning Zones



# Agency Consultations on PSEP

## Consulted with

- California Governor's Office of Emergency Services
- County of San Luis Obispo Administrative Office – Office of Emergency Services
- Federal Emergency Management Agency

## Actions taken

- Conducted meetings with agencies
- Responded to all questions and comments
- Revised PSEP to retain the following ERO positions:
  - Advisor to the County in the EOF
  - Dose Assessor in the EOF

# Thank You

