

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 1600 EAST LAMAR BOULEVARD ARLINGTON, TEXAS 76011-4511

October 24, 2022

EA-22-075

Paula A. Gerfen
Senior Vice President, Generation
and Chief Nuclear Officer
Pacific Gas and Electric Company
P.O. Box 56
Mail Code 104/6
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – INTEGRATED

INSPECTION REPORT 05000275/2022003 AND 05000323/2022003, AND

EXERCISE OF ENFORCEMENT DISCRETION

#### Dear Paula Gerfen:

On September 30, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Diablo Canyon Power Plant, Units 1 and 2. On October 6, 2022, the NRC inspectors discussed the results of this inspection with Adam Peck, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

A violation of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 37 with respect to large components containing category 2 quantities of radioactive material stored in robust structures was identified. However, Pacific Gas and Electric Company met all the criteria in NRC Enforcement Guidance Memorandum 14-001, "Interim Guidance for Dispositioning 10 CFR Part 37 Violations with Respect to Large Components or Robust Structures Containing Category 1 or Category 2 Quantities of Material at Power Reactor Facilities Licensed Under 10 CFR Parts 50 and 52" for the use of enforcement discretion. Therefore, the NRC is exercising enforcement discretion (EA-22-075) and will not issue enforcement action for this violation. Additional details are contained in the enclosure. Additionally, two violations of minor significance are documented in this report.

If you contest the violations or the significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; and the NRC resident inspector at Diablo Canyon Power Plant, Units 1 and 2.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

P. Gerfen 2

Sincerely,

Signed by Vossmar, Patricia on 10/24/22

Patricia J. Vossmar, Chief Projects Branch A Division of Operating Reactor Safety

Docket Nos. 05000275, 05000323 License Nos. DPR-80, DPR-82

Enclosure: As stated

cc w/ encl: Distribution via LISTSERV

P. Gerfen 3

DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – INTEGRATED INSPECTION REPORT 05000275/2022003 AND 05000323/2022003, AND EXERCISE OF ENFORCEMENT DISCRETION – DATED OCTOBER 24, 2022

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DOCUMENT NAME: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – INTEGRATED INSPECTION REPORT 05000275/2022003 AND 05000323/2022003 AND EXERCISE OF ENFORCEMENT DISCRETION

Non-Public Designation Category: MD 3.4 Non-Public \_\_\_\_\_ (A.3 - A.7 or B.1)
ADAMS ACCESSION NUMBER: ML22291A083

<b>S</b>	SUNSI Review  Non-Sensitive Publicly Available Non-Publicly Available Non-Publicly Available				
OFFICE	SRI:DORS/A	RI:DORS/A	SPE:DORS/A	TL:ACES	BC:DORS/A
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DATE	10/20/2022	10/24/2022	10/19/2022	10/19/2022	10/24/2022

# U.S. NUCLEAR REGULATORY COMMISSION Inspection Report

Docket Numbers: 05000275 and 05000323

License Numbers: DPR-80 and DPR-82

Report Numbers: 05000275/2022003 and 05000323/2022003

Enterprise Identifier: I-2022-003-0008

Licensee: Pacific Gas and Electric Company

Facility: Diablo Canyon Power Plant, Units 1 and 2

Location: Avila Beach, CA

Inspection Dates: July 1 to September 30, 2022

Inspectors: A. Athar, Resident Inspector

B. Bergeon, Senior Operations EngineerN. Greene, Senior Health PhysicistM. Hayes, Senior Resident Inspector

S. Hedger, Senior Emergency Preparedness Inspector

S. Lichvar, Project Engineer E. Simpson, Health Physicist

H. Strittmatter, Emergency Preparedness Inspector

Approved By: Patricia J. Vossmar, Chief

Projects Branch A

Division of Operating Reactor Safety

#### SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Diablo Canyon Power Plant, Units 1 and 2, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <a href="https://www.nrc.gov/reactors/operating/oversight.html">https://www.nrc.gov/reactors/operating/oversight.html</a> for more information.

# **List of Findings and Violations**

No findings or violations of more than minor significance were identified.

# **Additional Tracking Items**

Туре	Issue Number	Title	Report Section	Status
EDG	EA-22-075	Failure to Comply with	71124.08	Closed
		Exemptions of 10 CFR 37		
		Requirements for the		
		Monitoring, Detecting, and		
		Assessment of a Robust		
		Structure		

#### **PLANT STATUS**

Unit 1 and Unit 2 operated at or near rated thermal power for the entire inspection period.

#### **INSPECTION SCOPES**

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <a href="http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html">http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html</a>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors performed activities described in IMC 2515, Appendix D, "Plant Status," observed risk significant activities, and completed on-site portions of IPs. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

#### **REACTOR SAFETY**

#### 71111.01 - Adverse Weather Protection

#### Seasonal Extreme Weather Sample (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated readiness for seasonal extreme weather conditions of high temperatures prior to the onset of the restricted maintenance operations period for the Units 1 and 2 emergency diesel generators.

#### 71111.04 - Equipment Alignment

#### Partial Walkdown Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Unit 2 emergency diesel generator 2-1 on August 25, 2022
- (2) Unit 1 centrifugal charging pumps 1-1 and 1-2 on September 20, 2022

#### 71111.05 - Fire Protection

## Fire Area Walkdown and Inspection Sample (IP Section 03.01) (4 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) Unit 2 auxiliary building, 73-foot elevation, on July 26, 2022
- (2) Units 1 and 2 Technical Support Center on August 3, 2022
- (3) Unit 2 emergency diesel generator 2-1, 2-2, and 2-3 rooms, 85-foot elevation, on September 7, 2022
- (4) Unit 1 and Unit 2 transformer yards on September 19, 2022

## 71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

## <u>Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)</u>

(1) The inspectors observed and evaluated a crew of licensed operators during simulator training on September 6, 2022.

### 71111.12 - Maintenance Effectiveness

# Maintenance Effectiveness (IP Section 03.01) (1 Sample)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components remain capable of performing their intended function:

(1) Unit 2 emergency diesel generator 2-3 fuel oil leak on July 25, 2022

# 71111.13 - Maintenance Risk Assessments and Emergent Work Control

## Risk Assessment and Management Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) Unit 2 single point vulnerability for full load reject while output circuit breaker CB-642 was out of service for planned maintenance on July 13, 2022
- (2) Unit 2 unplanned start of emergency diesel generator 2-3 due to lube oil heater being found deenergized on August 21, 2022

### 71111.15 - Operability Determinations and Functionality Assessments

## Operability Determination or Functionality Assessment (IP Section 03.01) (5 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Unit 1 seismic trip system undervoltage on July 14, 2022
- (2) Unit 2 emergency diesel generator 2-3 fuel oil leak on July 21, 2022
- (3) Unit 1 and Unit 2 control room ventilation tracking limiting condition for operation on July 27, 2022
- (4) Unit 2 residual heat removal pump 2-1 recirculation line motor-operated valve drain orientation on August 23, 2022
- (5) Unit 2 emergency diesel generator 2-3 failure to reach required load during surveillance testing on September 15, 2022

#### 71111.18 - Plant Modifications

## Severe Accident Management Guidelines (SAMG) Update (IP Section 03.03) (1 Sample)

(1) The inspectors verified that the site severe accident management guidelines were updated in accordance with the pressurized water reactor generic severe accident technical guidelines and validated in accordance with Nuclear Energy Institute (NEI) 14-01, "Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents," revision 1.

# 71111.19 - Post-Maintenance Testing

## Post-Maintenance Test Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the following post-maintenance testing activities to verify system operability and/or functionality:

- (1) Unit 2 auxiliary feedwater pump 2-2 on August 2, 2022
- (2) Unit 1 battery charger performance test, battery 131, charger for vital bus on August 8, 2022
- (3) Unit 2 vital 4 kV, bus G, under voltage relay and time delay relay testing following visual inspections and cleaning on August 9, 2022
- (4) Unit 1 centrifugal charging pump 1-3 motor overhaul on September 21, 2022
- (5) Unit 2 pressurizer heater group 2-3 maintenance on September 27, 2022

## 71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance testing activities to verify system operability and/or functionality:

## Surveillance Tests (other) (IP Section 03.01) (1 Sample)

(1) Unit 1 residual heat removal pump 1, suction valve 8700A, surveillance testing on August 11, 2022

# FLEX Testing (IP Section 03.02) (1 Sample)

(1) test run of FLEX emergency auxiliary feedwater pump EAFWP1 and raw water reservoir supply pump RWRP1 on July 6, 2022

#### 71114.01 - Exercise Evaluation

#### Inspection Review (IP Section 02.01-02.11) (1 Sample)

(1) The inspectors evaluated the biennial emergency plan exercise conducted on September 14, 2022. The exercise scenario simulated a main turbine load reduction due to a heater drain pump trip, main turbine trip without automatic reactor trip, loss of a safety-related electrical bus, steam generator tube rupture, diesel 1-3 start failure, a faulted steam line associated with the ruptured steam generator, and an auxiliary saltwater pump failure.

## 71114.04 - Emergency Action Level and Emergency Plan Changes

## Inspection Review (IP Section 02.01-02.03) (1 Sample)

(1) The inspectors evaluated a revision to the Diablo Canyon Emergency Plan (appendix D, revision 5.03, effective June 2022). The inspectors also evaluated Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(q) emergency plan change process and practices between September 1, 2021, and August 29, 2022. This involved review of a selection of additional licensee screening and evaluation documentation. These evaluations and reviews do not constitute NRC approval.

## 71114.06 - Drill Evaluation

### Drill/Training Evolution Observation (IP Section 03.02) (1 Sample)

The inspectors evaluated:

(1) a simulator-based licensed operator requalification training that included implementation of the licensee's emergency plan on August 2, 2022

#### 71114.08 - Exercise Evaluation - Scenario Review

# Inspection Review (IP Section 02.01 - 02.04) (1 Sample)

(1) The inspectors reviewed the licensee's preliminary exercise scenario that was submitted to the NRC on July 13, 2022, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22194A932) for the exercise scheduled to occur on September 14, 2022. The inspectors discussed the preliminary scenario with Mr. A. Warwick, Manager, Emergency Preparedness, and other members of the emergency preparedness staff on August 4, 2022. The inspectors' review does not constitute NRC approval of the scenario.

#### **RADIATION SAFETY**

#### 71124.05 - Radiation Monitoring Instrumentation

## Walkdowns and Observations (IP Section 03.01) (10 Samples)

The inspectors evaluated the following radiation detection instrumentation during plant walkdowns:

- (1) portable friskers used at the 85-foot exit to the radiological control area
- (2) personnel contamination monitoring equipment at the 85-foot exit to the radiological control area: three (3) ARGOS-5WBAB
- (3) small article monitors (SAM-12) at the 85-foot exit to the radiological control area: three (3) Thermo SAM-12 units
- (4) personnel monitoring equipment at the 85-foot exit to the radiological control area: two (2) Canberra GEM-5 units
- (5) Canberra Apex-Invivo FASTSCAN whole body counter on the 85-foot floor of the radiological control area exit
- (6) personnel monitoring equipment at the plant exit: four (4) Canberra GEM-5 units

- (7) radiation monitoring equipment: Mirion Telepole II (03.41.029), RADOS-31 telemetry (03.34.061), Ludlum Model 3030 Alpha Beta Sample Counter (06.13.004 and 06.13.010)
- (8) plant process radiation monitors: component cooling water surge tank radiation monitors. RM-17A and RM-17B
- (9) plant effluent radiation monitors on the 100-foot fuel handling building, Unit 1: containment ventilation exhaust radiation monitors, RM-44A and RM-44B
- (10) plant effluent radiation monitor: Unit 0 oily water separator radiation monitor, RM-3

### Calibration and Testing Program (IP Section 03.02) (14 Samples)

The inspectors evaluated the calibration and testing of the following radiation detection instruments:

- (1) Canberra Apex-Invivo FASTSCAN whole body counter, #97-2391, 01/18/2022
- (2) Canberra Apex-Invivo FASTSCAN whole body counter, #97-2391, 05/18/2022
- (3) Eberline AMS-4 noble gas, #04.38.030, 06/13/2022
- (4) Thermo Scientific RO-20AA dose rate meter, #03.45.020, 01/26/2022
- (5) Ludlum Model 3 survey meter, #01.15.085, 12/06/2021
- (6) HPGe bed whole body counter, #97-5016, 01/20/2022
- (7) HPGe bed whole body counter, #97-5016, 05/24/2022
- (8) F&J Specialty portable air sampler, #04.40.002, 06/29/2022
- (9) Ludlum Model 177 frisker, #01.14.022, 03/08/2022
- (10) Thermo RadEye G dose rate meter, #03.32.015, 04/06/2022
- (11) Plant vent noble gas radiation monitor, RM-14, 07/15/2022
- (12) Unit 1 containment air radiation monitor, 1-RM-11, 10/24/2021
- (13) Unit 1 spent fuel pool area radiation monitor, 1-RM-58, 07/06/2021
- (14) Unit 2 new fuel area radiation monitor, 2-RM-59, 11/19/2020

## Effluent Monitoring Calibration and Testing Program Sample (IP Sample 03.03) (3 Samples)

The inspectors evaluated the calibration and maintenance of the following radioactive effluent monitoring and measurement instrumentation:

- (1) Work Order (WO) 64217082 and WO 64240666, Unit 1 containment high range effluent monitor, 1-RM-31, 03/26/2021 and 08/04/2022
- (2) WO 64222566, plant liquid radwaste effluent monitor, RM-18, 01/05/2022
- (3) WO 64227734, plant vent particulate monitor, RM-28, 02/08/2022

# 71124.08 - Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation

## Radioactive Material Storage (IP Section 03.01) (3 Samples)

The inspectors evaluated the licensee's performance in controlling, labeling, and securing the following radioactive materials:

- (1) J.L. Shepherd Model 492 beta calibrator, serial number 15007
- (2) J.L. Shepherd Model 81-10 calibrator, serial number 7064
- (3) J.L. Shepherd Model 78-2M calibrator, serial number 9091

### Radioactive Waste System Walkdown (IP Section 03.02) (3 Samples)

The inspectors walked down the following accessible portions of the solid radioactive waste systems and evaluated system configuration and functionality:

- (1) spent resin processing system
- (2) spent fuel pool cleanup system
- (3) solid waste storage facility

## Waste Characterization and Classification (IP Section 03.03) (3 Samples)

The inspectors evaluated the following characterization and classification of radioactive waste:

- (1) 2020 chemical volume control system mixed bed resin non-gamma nuclide concentration determination
- (2) 2020 radwaste correlation factors for various solid waste media
- (3) 2021 radwaste correlation factors for various solid waste media

## Shipment Preparation (IP Section 03.04)

The licensee had no shipments available for observation.

### Shipping Records (IP Section 03.05) (4 Samples)

The inspectors evaluated the following non-excepted radioactive material shipments through a record review:

- (1) Shipment RWS 20-001: UN2916, Radioactive Material, Type B(U) package, fissile-excepted, Class 7
- (2) Shipment RWS 20-002: UN3321, Radioactive Material, Low Specific Activity (LSA-II), Class 7
- (3) Shipment RWS 21-001: UN3321, Radioactive Material, Low Specific Activity (LSA-II), fissile-excepted, Class 7, RQ (reportable quantity)
- (4) Shipment RWS 21-003: UN2916, Radioactive Material, Type B(U) package, fissile-excepted, Class 7, RQ (reportable quantity)

#### OTHER ACTIVITIES - BASELINE

#### 71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

#### MS08: Heat Removal Systems (IP Section 02.07) (2 Samples)

- (1) Unit 1 (July 1, 2021, through June 30, 2022)
- (2) Unit 2 (July 1, 2021, through June 30, 2022)

#### MS09: Residual Heat Removal Systems (IP Section 02.08) (2 Samples)

- (1) Unit 1 (July 1, 2021, through June 30, 2022)
- (2) Unit 2 (July 1, 2021, through June 30, 2022)

## MS10: Cooling Water Support Systems (IP Section 02.09) (2 Samples)

- (1) Unit 1 (July 1, 2021, through June 30, 2022)
- (2) Unit 2 (July 1, 2021, through June 30, 2022)

### EP01: Drill/Exercise Performance (DEP) Sample (IP Section 02.12) (1 Sample)

(1) July 1, 2021, through June 30, 2022

# <u>EP02: Emergency Response Organization (ERO) Drill Participation (IP Section 02.13)</u> (1 Sample)

(1) July 1, 2021, through June 30, 2022

## EP03: Alert and Notification System (ANS) Reliability Sample (IP Section 02.14) (1 Sample)

(1) July 1, 2021, through June 30, 2022

## 71152A - Annual Follow-up Problem Identification and Resolution

## Annual Follow-up of Selected Issues (Section 03.03) (1 Sample)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

(1) steam generator blowdown flash tank pressure excursion on September 2, 2022

#### **INSPECTION RESULTS**

Minor Violation 71111.20

Minor Violation: The inspectors reviewed a minor violation of NRC requirements. Title 10 CFR 26.205(d)(7)(i) requires, in part, that individuals may not work more than a weekly average of 54 hours, calculated using an average period of up to six weeks. Contrary to the above, on March 26, 2022, an individual worked more than a weekly average of 54 hours, calculated using an average period of up to six weeks. Specifically, an individual in the electrical maintenance department exceeded the work hour limit by 5 hours.

Screening: The inspectors determined the performance deficiency was minor. The extra hours worked were identified by the licensee's software for monitoring the work hours of employees covered by 10 CFR 26.205. The individual did not make any errors while on shift and there were no adverse safety consequences from this fatigue rule violation. The violation is minor because it was not a precursor to a significant event, did not lead to a more significant safety concern, and did not adversely affect any safety cornerstone objectives. The licensee entered this issue into the corrective action program as notification 51147960.

Enforcement: This failure to comply with 10 CFR 26.205(d)(7)(i) constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy.

Minor Violation 71111.20

Minor Violation: The inspectors reviewed a minor violation associated with the Unit 1 core offload. Technical Specification 5.4.1.a requires, in part, that written procedures shall be implemented covering the activities recommended by Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Regulatory Guide 1.33, Appendix A, step 2.k requires, in part, operating procedures for refueling equipment operation. Operating Procedure OP B-8DS1, "Core Unloading," revision 66, is an implementing procedure for Regulatory Guide 1.33. Procedure OP B-8DS1, Step 6.5.9 requires, in part, that if less than six fuel assemblies have been removed from the core then wait until the upender has been unloaded on the spent fuel pool side before proceeding. Contrary to the above, on April 2, 2022, with less than six assemblies removed from the core, refueling personnel failed to wait until the upender had been unloaded on the spent fuel pool side before proceeding. Specifically, refueling personnel latched the fifth assembly from the core while the fourth assembly was still in the upender.

Screening: The inspectors determined the performance deficiency was minor. Refueling personnel identified the error, all fuel moves were stopped, and the licensee conducted a safety brief. In addition, no equipment was damaged and no personnel were injured due to the error. The issue is minor because it was not a precursor to a significant event, did not lead to a more significant safety concern, and did not adversely affect any safety cornerstone objectives. The licensee entered this issue into the corrective action program as notification 51148251.

Enforcement: This failure to comply with a procedure required by Technical Specification 5.4.1.a constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy.

Enforcement	Enforcement Action EA-22-075: Failure to Comply with	71124.08
Discretion	Exemptions of 10 CFR 37 Requirements for the Monitoring,	
	Detecting, and Assessment of a Robust Structure	

<u>Description</u>: During four refueling outages between 2008 and 2010, the licensee removed eight steam generators and two reactor vessel heads from the containment buildings and transferred them to a large concrete storage building outside of the protected area. Although this waste material exceeded the threshold for a category 2 quantity of radioactivity, it did not contain discrete radioactive sources, ion-exchange resins, or activated material that weighed less than 2,000 kg. Therefore, the steam generators and reactor vessel heads are considered waste material that is exempt from 10 CFR Part 37, subparts B, C, and D, but must comply with the requirements of 10 CFR 37.11. The inspectors observed that some of these requirements were not met.

Corrective Actions: The licensee entered the issue into the corrective action program.

Corrective Action References: SAPN-51160319, SAPN-51160713

Enforcement:

Severity/Significance: Minor

Violation: Title 10 CFR 37.11 requires, in part, minimal security requirements for a category 2 quantity of radioactive waste that is exempt from 10 CFR Part 37, subparts B, C, and D. Contrary to the above, from March 19, 2014 (initial compliance date with 10 CFR Part 37) to

the present, the licensee has stored a category 2 quantity of exempt waste in a large concrete storage module without meeting all of the security requirements of 10 CFR 37.11.

Basis for Discretion: This violation met the criteria for Enforcement Discretion as described in Enforcement Guidance Memorandum (EGM) 14-001, "Interim Guidance for Dispositioning 10 CFR Part 37 Violations with Respect to Large Components or Robust Structures Containing Category 1 or Category 2 Quantities of Material at Power Reactor Facilities Licensed Under 10 CFR Parts 50 and 52."

### **EXIT MEETINGS AND DEBRIEFS**

The inspectors verified no proprietary information was retained or documented in this report.

- On August 4, 2022, the inspectors presented the radiation safety inspection results to Maureen Zawalick, Vice President of Decommissioning and Technical Services, and other members of the licensee staff.
- On August 4, 2022, the inspectors presented the emergency preparedness exercise scenario review inspection results to Andrew Warwick, Manager, Emergency Preparedness, and other members of the licensee staff.
- On October 5, 2022, the inspectors presented the emergency preparedness exercise inspection results to Matt Hayes, Senior Director, Organizational Effectiveness and Training, and other members of the licensee staff.
- On October 6, 2022, the inspectors presented the integrated inspection results to Adam Peck, Site Vice President, and other members of the licensee staff.

## THIRD PARTY REVIEWS

The inspectors reviewed Institute of Nuclear Power Operations reports that were issued during the inspection period.

# **DOCUMENTS REVIEWED**

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
71111.01	Procedures	AD7.DC6	On-Line Maintenance Risk Management	28
		Operations Section Policy	Communications with Generation and Transmission	29
		B-1	Organizations	
71111.04	Procedures	OP B-1A:V	CVCS-Transfer Charging Pumps	30
		OP J-6B:I-A	Diesel Generator 2-1 - Alignment Checklist	1
		OP K-10A10	Sealed Component Checklist for Charging Pump 1-1	11
		OP K-10A11	CVCS Sealed Component Checklist for Charging	11
			Pump	
71111.05	Corrective Action Documents	Notifications	51160263, 51160268, 51160269, 51160294	
71111.05	Drawings	111805-8	Radiological Control Area Elevation 73'	5
		111805-69	Unit 1 Transformer Yard	6
		111805-71	Unit 2 Transformer Yard	5
		111805-58	Turbine Building Buttress Elevation 85' & 104'	3
		111805-60	Turbine Building Elevation 85'	6
71111.12	Corrective Action Documents	Notifications	51159097	
71111.12	Procedures	STP M-21-ENG.1	Diesel Engine Generator Inspection (Every Refueling Outage)	29
	Procedures	STP M-21-ENG.2	Diesel Engine Generator Inspection (Every Second Refueling Outage)	16
	Procedures	STP M-21-ENG.4	Diesel Engine Generator Inspection (Every Fourth Refueling Outage)	12
	Procedures	STP M-21-ENG.6	Diesel Engine Generator Inspection (Every Sixth Refueling Outage)	7
	Procedures	STP M-81G	Diesel Engine Generator Inspection (Electrical Every Refueling Cycle)	30
71111.12	Work Orders	WO	60146308	
71111.13	Drawings	663082-320	Diesel Generator Lube Oil Heater Control	7

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
71111.15	Corrective Action Documents	Notification	51088130, 51158532, 51159057, 51159097, 51163955, 51164009	
71111.15	Drawings	437904-1	Diagram and Panel Schedule Lighting and Distribution	52
	Drawings	458857-1	Diagram of Connections Seismic Trip Cabinets	10
	Drawings	493716	Arrangement and Diagram of Connections Nuclear Seismic Cabinets	2
	Drawings	502115-1	Schematic Diagram Main Annunciator	40
	Drawings	503389-1	Diagram of Connections Below Elevation 117'	25
	Drawings	693512-6	Seismic Trip Schematic	6
71111.15	Procedures	STP M-9A3	Diesel Engine Generator 2-3 Routine Surveillance Test	16
71111.18	Procedures	DPG	Diagnostic Process Guideline	0
		SAG 1	Control Room Initial Response	0
		SAG 10	Control Spent Fuel Pool Level	1
		SAG 2	Control Room - TSC Recommending Strategies	0
		SAG 3	Inject into Steam Generators	0
		SAG 4	Depressurize RCS	0
		SAG 5	Inject into RCS	0
		SAG 6	Inject into Containment	0
		SAG 7	Reduce Containment Hydrogen	0
		SAG 8	Control Containment Pressure	0
		SAG 9	Mitigate Fission Product Release	0
71111.19	Corrective Action Documents	Notifications	51164062, 51164402, 51164404, 51164430, 51164475, 51164674, 51164717, 51164725, 51164792	
71111.19	Procedures	MP E-50.30B	Agastat Type ETR Timing Relay Maintenance	27
	Procedures	MP E-50.33A	Westinghouse Type SSV-T One Unit Voltage Relay Maintenance	14A
	Procedures	MP E-50.61	Basler Type BE1-27 Inverse Undervoltage Relay Maintenance	8A
	Procedures	MP E-50.62	Basler BE1-GPS100 Relay Maintenance	9
	Procedures	MP E-60.2HH8	Circuit Function Test - 4kV Cubicle HH8 (AFWP22)	3

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
_	Procedures	MP E-63.6A	Maintenance of SF6 4kV Circuit Breakers	29
	Procedures	MP E-64.1B	Molded Case Circuit Breaker Exercise and Maintenance	20A
	Procedures	MP E-7.5A	Pressurizer Heater Preventative Maintenance	13
	Procedures	STP I-1D	Routine Monthly Checks Required by Licenses	82
	Procedures	STP M-75G	4kv Vital Bus G Undervoltage Relay Calibration	9
	Procedures	STP P-CCP-13	Routine Surveillance Test of Centrifugal Charging Pump 1-3	11A
71111.19	Work Orders	WO	60115509, 60128965, 60146501, 64138067, 64237154	
71111.22	Corrective Action Documents	Notifications	64212769, 64260862	
71111.22	Procedures	EOP E1.3	Transfer to Cold Leg Recirculation	34
	Procedures	FSG 03	Unit 1 Alternate Low Pressure Feedwater	1B
	Procedures	FSG 03	Unit 2 Alternate Low Pressure Feedwater	0B
	Procedures	FSG 14	Unit 1 Shutdown RCS Makeup	2
	Procedures	FSG 14	Unit 2 Shutdown RCS Makeup	1
	Procedures	FSG 42	Establishing the FLEX Suction Header Water Supply	1
	Procedures	STP V-2D2A	Exercising and Position Verification of Valve 8700A	5
	Procedures	STP V-3M4A	Exercising RHR Pump 1 Suction Valve 8700A	11
71111.22	Work Orders	WO	64238738	
71114.01	Corrective Action Documents	Notifications	51140977, 51140978, 51140979, 51143787, 51145089, 51145525, 51150524, 51157573, 51160719, 51163991, 51163992, 51163993, 51163996, 51164001, 51164002, 51164030, 51164030, 51164031, 51164032, 51164031, 511640	
			51164031, 51164074, 51164098, 51164113, 51164339, 51164376, 51164377, 51164389, 51164390, 51164410, 51164441, 51164447, 51164448, 51164466, 51164533, 51164538, 51164551, 51164676, 51164727, 51164744, 51164992, 51165028, 51165081, 51165083,	
			51165084, 51165141, 51165497, 51165500	

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
71114.01	Corrective Action Documents Resulting from Inspection	Notifications	51163765, 51163833, 51163850	
71114.01	Miscellaneous		Critique Report - Team Delta Dress Rehearsal	08/10/2022
	Miscellaneous		Critique Report – Team Delta EDMG Focused Area Drill	11/04/2021
	Miscellaneous		Critique Report – 1Q22 DEP Tabletops Drill Report	02/24/2022
	Miscellaneous		Critique Report – Team Delta Training Drill	06/23/2022
	Miscellaneous		Critique Report – 2Q22 Tabletop Training Drills Report	06/27/2022
71114.01	Procedures	EP EF-1	Activation and Operation of the Technical Support Center	51
	Procedures	EP EF-10	Operation of the Joint Information Center	19
	Procedures	EP EF-3	Activation and Operation of the Emergency Operations Facility	50
	Procedures	EP G-1	Emergency Classification and Emergency Plan Activation	46
	Procedures	EP G-3	Emergency Notification of Off-Site Agencies	63
	Procedures	EP G-4	Assembly and Accountability	28
	Procedures	EP R-2	Release of Airborne Radioactive Materials Initial Assessment	38
	Procedures	EP RB-10	Protective Action Recommendations	21
	Procedures	EP RB-10	Protective Action Recommendations	19
	Procedures	EP RB-16	Operating Instructions for the EARS Computer Program	18
	Procedures	Form 69-20436	Site Emergency Coordinator Checklist	10/30/2015
	Procedures	Form 69-20438	Plant PA Announcement	05/07/2012
	Procedures	Form 69-20439	TSC Director Checklist	04/27/2015
	Procedures	Form 69-20443	Agency/ENS Communicator Checklist	10/01/2014
	Procedures	Form 69-20455	Operations Advisor Checklist	04/03/2015
	Procedures	Form 69-20459	Operation of the TSC Ventilation System	04/03/2015
	Procedures	OM10.DC1	Emergency Preparedness Drills and Exercises	10

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
	Procedures	OP1.DC10	Conduct of Operations	44A
71114.04	Corrective Action Documents	Notifications	51133679, 51136569, 51145525	
71114.04	Miscellaneous	DCL-22-052/DIL-22-009	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-2511Diablo Canyon Independent Spent Fuel Storage Installation; Emergency Plan Update	07/06/2022
	Miscellaneous	Tracking Number 2018-34	Conversion of DCL 16-099 Attachment 3 into Emergency Plan Appendix D	06/18/2018
	Miscellaneous	Tracking Number 2021-20	EP EF-1, "Activation and Operations of the Technical Support Center," Revision 60	02/05/2022
	Miscellaneous	Tracking Number 2021-23	EP EF-1 Revision to Provide for NRC Consultation Capability in the TSC	02/08/2022
	Miscellaneous	Tracking Number 2022-09	Emergency Plan Appendix D Changes	05/10/2022
	Miscellaneous	Tracking Number 2022-10	Emergency Plan Appendix D Changes	05/11/2022
71114.04	Procedures	EP EF-1	Activation and Operation of the Technical Support Center	60
	Procedures	OM10.ID2	Emergency Plan Revision and Review	13A
71114.08	Miscellaneous		E-Plan Appendix D - EAL Technical Basis Manual	5.02, 5.03
		DCL-22-055	Docket No. 50-275, OL-DPR-80; Docket No. 50-323, OL-DPR-82; Diablo Canyon Units 1 and 2; Materials License No. SNM-2511, Docket No. 72-26; Diablo Canyon Independent Spent Fuel Storage Installation; Biennial Exercise Scenario Data Package for the 2022 Evaluated Exercise	07/13/2022
71114.08	Procedures	EP G-1	Emergency Classification and Emergency Plan Activation	46
	Procedures	EP RB-10	Protective Action Recommendations	21
71124.05	Corrective Action Documents	SAPN	51064998, 51080691, 51084151, 51086208, 51097686, 51111309, 51111401, 51119883, 51122239, 51122912, 51123146, 51123724, 51126199, 51128074, 51145775, 51150985, 51154353, 51151750, 51160272	

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
71124.05	Corrective Action Documents Resulting from Inspection	SAPN	51160220, 51160272, 51160285	
71124.05	Miscellaneous		Primary to Secondary Isotopic Source Relationship for Plant Vent Normal Range Noble Gas Radiation Monitor 2-RM-14R	08/03/2022
	Miscellaneous		DCPP Units 1 and 2 Final Safety Analysis Report (USAR) Update, Chapters 11 and 12	24
	Miscellaneous		Information for Installed Process Radiation Monitors	07/25/2022
	Miscellaneous		Initial to Secondary Isotopic Source Relationship for CHRRM 1-RM-31	08/04/2022
71124.05	Procedures	CY 2	Radiological Monitoring and Controls Program	7B
	Procedures	CY 2.ID1	Radioactive Effluent Controls Program	16
	Procedures	RCP D-211	Using Remote Monitoring Technology for Remote Continuous Coverage	58
	Procedures	RCP D-811	Operation of the System Particulate Iodine Noble Gas (SPING) Monitor	ЗА
	Procedures	RCP D-900	Performance Tests for Radiation Protection Instruments	65
	Procedures	RCP D-923	Thermo SAM-12 Small Article Monitor Operation	16A
	Procedures	RCP D-970	Radiation Protection Instrument Calibration Schedule	24
	Procedures	RCP D-980	Operation of the J.L. Shepherd Model 89 Calibrator	7
	Procedures	RCP D-981	Annual Verification of the J.L. Shepherd Model 89 Shielded Calibrator	4
	Procedures	STP I-120A	Functional Test of Containment Air Particulate Radiation Monitor RM-11	11
	Procedures	STP I-120B	Calibration of Containment Air Particulate Radiation Monitor RM-11	15
	Procedures	STP I-120B	Calibration of Liquid Radwaste Discharge Radiation Monitor RM-18	6A
	Procedures	STP I-39-R14.B	Plant Vent Discharge Noble Gas RM-14 Radiation Monitor Calibration	16

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
	Procedures	STP I-39-R30.B	Containment High Range Area Radiation Monitor RM-30/RM-31 Calibration	19
71124.05	Self- Assessments	SAPN 51151750	Perform Quick Hit Self-Assessment against NRC IP 71124.05	06/22/2022
71124.08	Corrective Action Documents	SAPN	51086429, 51086442, 51086859, 51088415, 51092294, 51092294, 51104447, 51105087, 51106002, 51120593, 51124159, 51126068, 51134590, 51144410, 51144798, 51147004, 51147007, 51147007, 51147096, 51147685, 51151940	
71124.08	Corrective Action Documents Resulting from Inspection	SAPN	51160158, 51160319, 51160381, 51160382, 51160713	
71124.08	Procedures	RCP D-631	Radioactive Material Shipments	13
<u> </u>	Procedures	RCP RW-1	Collection and Packaging of Low-Level Radioactive Waste	17
	Procedures	RCP RW-20	Spent Resin Sampling	9
	Procedures	RCP RW-21	Spent Media Sampling	7A
	Procedures	RCP RW-3	Radioactive Waste Nuclide Fractions and Correlation Factor Determination	25
	Procedures	RCP RW-4	Solid Radioactive Waste Shipment	31B
	Procedures	RCP RW-5	Receiving, Loading and Releasing of Transport Vehicles for Radwaste Shipments	15
	Procedures	RCP RW-7	Burial Site Disposal Criteria and Classification of Radwaste	16
	Procedures	RP1.ID14	Radioactive Material Control	10
	Procedures	RP1.ID18	Transportation Security Plan	2
	Procedures	RP2.DC1	Radioactive Waste Classification Program	6
71124.08	Radiation	35540	Spent Fuel Pool Filter/Pump Room 100-foot	07/14/2014
	Surveys		Elevation	
71124.08	Self- Assessments		2021 Annual Evaluation of Category 1 and Category 2 Radioactive Material Areas	10/14/2021
	Self-		2020 Annual Evaluation of Category 1 and Category	11/03/2020

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
	Assessments		2 Radioactive Material Areas	
	Self-	SAPN 51088415	Quick Hit Self-Assessment NRC IP 71124.08,	06/29/2021
	Assessments		Radioactive Solid Waste Processing and	
			Radioactive Material Handling, Storage and	
			Transportation	
	Self-	SAPN 51124159	Quick Hit Self-Assessment Annual Review of the	06/29/2022
	Assessments		Part 37 Security Program	
71151	Corrective Action	Notifications	51131053	
	Documents			
71151	Miscellaneous		Unit 1 and Unit 2 MSPI Margin Report (AFW)	
	Miscellaneous		Unit 1 and Unit 2 PLE Derivation Report (AFW)	
	Miscellaneous		Unit 1 and Unit 2 UAI Derivation Report (AFW)	
	Miscellaneous		Unit 1 and Unit 2 URI Derivation Report (AFW)	
	Miscellaneous		Unit 1 and Unit 2 MSPI Margin Report (CCW/ASW)	
	Miscellaneous		Unit 1 and Unit 2 PLE Derivation Report	
			(CCW/ASW)	
	Miscellaneous		Unit 1 and Unit 2 UAI Derivation Report (CCW/ASW)	
	Miscellaneous		Unit 1 and Unit 2 URI Derivation Report	
			(CCW/ASW)	
	Miscellaneous		Unit 1 and Unit 2 MSPI Margin Report (RHR)	
	Miscellaneous		Unit 1 and Unit 2 PLE Derivation Report (RHR)	
	Miscellaneous		Unit 1 and Unit 2 UAI Derivation Report (RHR)	
	Miscellaneous		Unit 1 and Unit 2 URI Derivation Report (RHR)	
	Miscellaneous		ANS Test Report Data 2021Q3-2022Q2	
	Miscellaneous		Quarterly Key ERO Member Drill Participation	
			Records 2021Q2 - 2022Q3	
	Miscellaneous		DEP PI Data 2021Q2 - 2022Q3	
71151	Procedures	AWP EP-001	Emergency Preparedness Performance Indicators	23
	Procedures	EP MT-43	Early Warning System Testing and Maintenance	18
ı	Procedures	EP MT-43	Early Warning System Testing and Maintenance	17
71152A	Corrective Action	Notifications	51151560	
	Documents			