Diablo Canyon Power Plant (DCPP)
License Renewal Application

Safety and Environmental
Pre-Application Submittal Meeting

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September 13, 2023

PG&E

Introduction

- Pacific Gas and Electric Company (PG&E) owns and operates Diablo Canyon Power Plant (DCPP).
- DCPP was slated to close at the end of the current license term under a program called the Joint Proposal – a 9-year transition plan to phase out DCPP and build out other statewide carbon-free resources.
- In 2022, the State of California (State) directed PG&E to preserve the option of extending DCPP operations and take the necessary steps to continue operating the plant for up to 5 years to better ensure electrical reliability statewide as clean energy resources are brought online.
- PG&E will apply for a renewed license from the NRC by December 2023.

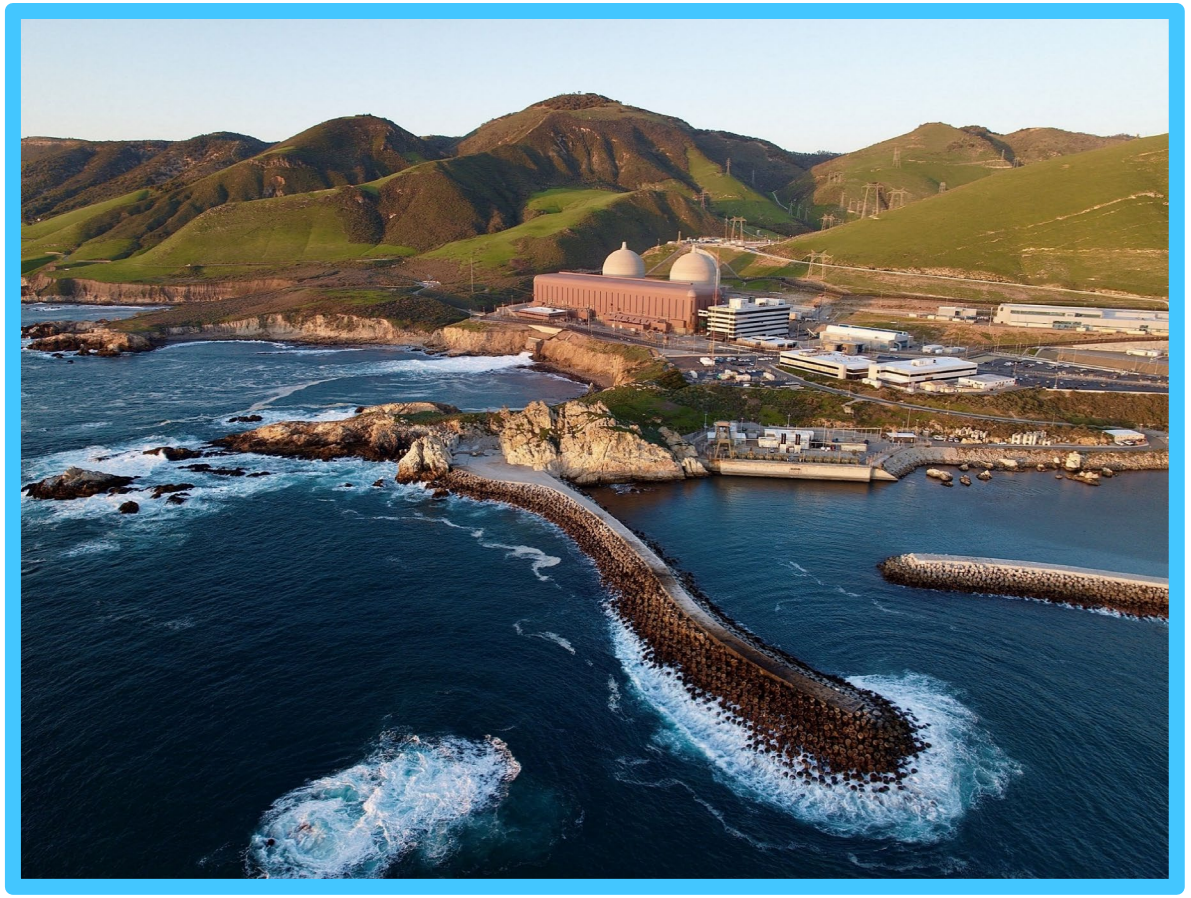
> *"We understand we earn the right to operate each day and we have no greater responsibility than operating, maintaining, and protecting Diablo Canyon with excellence on behalf of our customers and hometowns." – Paula Gerfen, Senior Vice President and Chief Nuclear Officer*

Agenda

- **General Information**
- **Safety Portion of the License Renewal Application (LRA)**
  - Application Preparation Approach
  - Topics of Interest
  - Discussion, Future Activities, and Q&A
- **Environmental Portion of the LRA**
  - Key Discussion Topics
  - Lessons Learned
  - Additional Topics
- **Closing Remarks**

General Information

- **DCPP Units 1 and 2**
  - Owner and operator: PG&E
  - Four Loop Westinghouse PWRs that are nearly identical
  - Located near Avila Beach in San Luis Obispo County, California
    - Adjacent to the Pacific Ocean
    - Roughly equidistant from San Francisco and Los Angeles
    - Approximately 12 miles west-southwest of the City of San Luis Obispo, California



DCPP Site Layout

1. DCPP Units 1 and 2
2. Turbine Building
3. Discharge
4. Intake
5. ISFSI

General Information

- **PG&E plans to submit a new DCPP LRA to the NRC by December 31, 2023, for up to 20 years of additional operation for DCPP Units 1 and 2 in accordance with NRC's standard review process.**
  - 20-year application allows PG&E to reference substantial industry precedent and provides the State with energy planning flexibility (actual duration of continued operation will be determined by State).

DCPP Upgrade History	Unit 1	Unit 2
Initial License	11/02/1984 (3,338 MW_t)	08/26/1985 (3,411 MW_t)
Unit 1 Uprate to 3,411 MW_t	10/26/2000	N/A
Current License Expiration Date	11/02/2024	08/26/2025

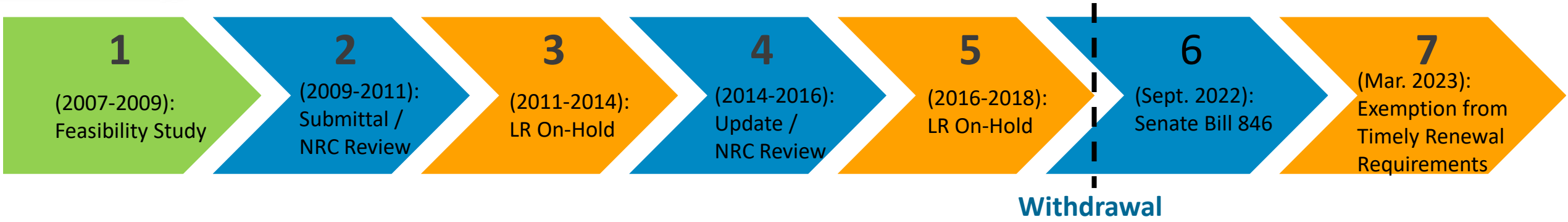
General Information

- **Project Team Experience**
  - PG&E team includes individuals who were involved with the original DCPP LRA project: subject matter experts, technical experts, and more
  - PG&E actively involved in all NEI License Renewal (LR) Working Groups
  - PG&E engaged in NEI LR Environmental Task Force
  - PG&E engaged and attending all LR related public meetings
  - Experienced PG&E technical personnel on LR Team
  - Engaged resources with extensive LR experience
    - ENERCON (Safety and Environmental), Structural Integrity Associates, and Westinghouse

General Information

- **Actions taken to ensure a high-quality application**
  - Reviewed and addressed recent initial and subsequent license renewal (SLR) applicant requests for additional information (RAIs) and Supplements (including Comanche Peak (LR), Byron-Braidwood (LR), Waterford (LR), Point Beach (SLR), and North Anna (SLR))
  - Developed using proven technical and administrative procedures informed by current regulatory guidance
  - Builds on and incorporates lessons learned from original DCPP application
  - Independent entities have been engaged to provide oversight and reviews of the application and implementing activities
  - Coordinated with industry to conduct a peer review prior to submittal

DCPP License Renewal History



- **During review of the original LRA, PG&E responded to RAIs related to Generic Aging Lessons Learned (GALL), Revision 2, requirements**
- **In June 2011, NRC issued the Safety Evaluation Report for the safety portion of the application**
- **Annual updates were submitted from 2011 through 2015**
- **Multi-year update of LRA submitted in 2014 (block 4) for NRC review:**
  - Typical annual update items (e.g., review of component database for changes, review of operating experience)
  - Addressed new LR Interim Staff Guidance (LR-ISGs) documents through 2015
  - Updated Environmental Report (e.g., census data, threatened and endangered species, alternatives evaluation, and Severe Accident Mitigation Alternatives Analysis)
- **Review of LRA was placed on hold in 2016 and withdrawn in 2018**
- **After approval of SB 846, PG&E re-started LR efforts**

Approach to Application – Safety

- **New DCPP LRA**
  - PG&E is developing a new LRA in accordance with the most current guidance for LR, NUREG-1801, Generic Aging Lessons Learned (GALL), Revision 2 (ML103490041)
    - Includes LR-ISGs issued since 2010 (LR ISG Topics Issued 2011-2016)
    - Considers industry operating experience (OE) from SLR
      - GALL-SLR (Volume 1; ML17187A031 and Volume 2; ML17187A204)
      - SLR-ISGs (SLR-ISG Topics)
  - Consistent with guidance in NEI 95-10, Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule, Revision 6 (ML051860406)

Volume 1

Volume 2

Approach to Scoping and Screening – Safety

- **Nuclear Safety Related, 10 CFR 54.4(a)(1)**
- **Non-Safety Affecting Safety, 10 CFR 54.4(a)(2)**
  - Spaces Approach consistent with NEI 95-10, App. F
  - Conservatively included the components within the seismically induced systems interaction program
- **Regulated Events, 10 CFR 54.4(a)(3)**
  - Fire Protection, 10 CFR 50.48
  - Environmental Qualification, 10 CFR 50.49
  - Pressurized Thermal Shock, 10 CFR 50.61
  - Anticipated Transient Without SCRAM, 10 CFR 50.62
  - Station Blackout, 10 CFR 50.63

Approach to Scoping and Screening – Safety (cont.)

- **Scoping and screening results from original DCPP application**
  - Used as baseline and updated based on a review of plant changes (Updated Final Safety Analysis Report, correspondence, design changes, etc.)
- **Structures, Systems, and Components Intended Functions**
  - Component Intended Functions consistent with NEI 95-10, Rev. 6
  - Updated to be consistent with recent industry precedent

Approach to Aging Management Review – Safety

- **System/Structure AMR (9-column) Tables**
  - Generic Notes
    - Majority are Note A through E – consistent with GALL
  - Plant-Specific Notes
    - Cite NUREG-2191 line-items considered as applicable OE
    - Clarify component details or configurations
  - Examples of Unique Materials
    - Fiberglass reinforced plastic (Pump Casing: Circulating Water Top Cover Sump Pumps)
    - Polyphenylene Sulfide (Pump Casing: Diesel Engine Generator Fuel Oil Priming Magnetic Drive Pumps)
    - Lexan (Thermoplastics) (Auxiliary Steam Tank)

Aging Management Program (AMP) Overview – Safety

Total AMPs	Plant-Specific AMPS	Existing GALL AMPs	New GALL AMPs
44	2	31	11

Consistent with GALL (no exceptions or enhancements)	Includes Exception(s) Only	Includes Exception(s) & Enhancement(s)	Includes Enhancement(s) Only
8	2	11	10

New AMPs with exceptions	Consistent with GALL
3	8

Note: The application is currently under development so these may change prior to final submittal.

Overview of Exceptions – Safety

Exceptions

- Definition – A program element which is not functionally equivalent to the NUREG-1801, Generic Aging Lessons Learned (GALL), Revision 2 program element for existing or new programs.
- Justifications for each exception are provided in the LRA to satisfy the objective of managing aging.
- Exceptions are taken to GALL, Revision 2, for various reasons including the following:
  - Applying later NRC guidance
  - Proposing more recent industry standards

AMP Exceptions (Mechanical)

Steam Generators, XI.M19

- Exception to the frequency of visual inspections of the heads and tubesheets based on current DCPP Technical Specifications.
- Exception to use later revisions of EPRI standards.

Flow Accelerated Corrosion, XI.M17

- Exception to use later revisions of standards which have been included in GALL-SLR.

Reactor Head Closure Stud Bolting, XI.M3

- PG&E takes an exception to the material measured yield strength requirements for the reactor head studs that are currently in service, as well as those currently on site as replacement studs. The DCPP reactor vessel closure studs were fabricated prior to issuance of NRC RG 1.65, Revision 0, and were built in accordance with the required design specifications, SA-540 Grade B-23 and B-24.

Reactor Vessel Surveillance, XI.M31

- Exception that not all pulled and tested capsules are placed in storage. While all capsules that have been pulled and tested were stored, several Charpy V- Notch specimens from Unit 2 Capsule V have been donated to the EPRI research program. Only these donated specimens will no longer be available for future use at DCPP.

AMP Exceptions (Mechanical)

Closed Treated Water Systems, XI.M21

- Exceptions to EPRI Report 3002000590 for specific parameters controlled and monitored and the monitoring frequency. These exceptions maintain alignment with current DCPP practices and certain ranges limited for National Pollutant Discharge Elimination System (NPDES) permit purposes.

Fire Protection, XI.M26

- Exception to percentages of penetration seals inspected based on the NRC-approved Fire Protection Program.

Internal Surfaces (New), XI.M38

- In addition to loss of material, this program will be used to monitor cracking of stainless steel, aluminum, and copper alloy (>15% Zn or >8% Al) components, which has been included in the GALL-SLR AMP.
- To address recurring internal corrosion, DCPP will replace the copper alloy piping portions of the domestic water system that are in the scope of LR with a material that is more corrosion-resistant or install pipe shielding to ensure that no adverse a(2) spatial interactions could occur by December 1, 2028, versus prior to the period of extended operations (PEO).

AMP Exceptions (Mechanical)

Bolting Integrity, XI.M18

- Exception to the requirements to perform direct inspection of bolting for safety-related pressure retaining components for loss of preload. Exception requested to maintain current DCPP plant-specific practices which have been demonstrated effective in maintaining bolting integrity and reliability.

Internal Coatings and Linings (New), XI.M42

- Exception to LR-ISG-2013-01 recommendation that baseline coating/lining inspections occur in the 10-year period prior to the PEO. DCPP will complete the baseline coating/lining inspections and/or external wall thickness measurements no later than December 1, 2028.
- Exception for inspections to align with NRC guidance in SLR-ISG-2021-02-Mechanical.

Aboveground Metallic Tanks (New), XI.M29

- Exception to perform periodic inspections by verifying the absence of aging via one-time inspection prior to the PEO. This verifies there is no loss of material on the external surfaces of the tanks that are encased on concrete, and therefore, periodic volumetric inspections are not necessary.
- Exception for the sample size to align with NRC guidance in GALL-SLR.

Fuel Oil Chemistry, XI.M30

- Exception to water removal and periodic sampling based on the design/configuration of two tanks.

AMP Exceptions (Mechanical)

Fire Water System, XI.M27

- DCPP will manage more materials than those included in NUREG-1801 and LR-ISGs. The program includes asbestos concrete piping (ACP) and polyvinyl chloride piping (PVC).
- Exceptions to testing frequencies to remain consistent with current licensing basis requirements in the NRC-approved NFPA-805 Fire Protection Program.
- Exceptions to testing methods based on the design/configuration of the system.
- Instead of cleaning and inspecting the raw water storage reservoir and long-term cooling screens and strainers annually or on a refueling outage basis, DCPP will clean and inspect the screens and strainers every two years. This inspection frequency maintains consistency with historical practices.
- Degradation of the Fire Water Storage Tank such as interior pitting, corrosion, or coating failures shall be entered into the CAP and an engineering evaluation shall be performed to determine if further action is required in accordance with NFPA 25, Section 9.2.7. This exception will prevent requiring draining the tank anytime degradation is found and will allow an engineering evaluation to determine any further actions.

AMP Exceptions (Mechanical)

Buried and Underground Piping and Tanks, XI.M41

- Exception to LR-ISG-2015-01 Table XI.M41-1 recommendation for the diesel fuel oil storage tanks, makeup water cast iron valves, and short portions of the buried steel discharge and supply piping in the Auxiliary Saltwater (ASW) system to have cathodic protection.
  - Exception requested for the diesel fuel oil storage tanks and the ASW supply and discharge piping based on feasibility due to the system design/configuration.
  - Three make-up water valves are not cathodically protected but will be inspected in accordance with LR-ISG-2015-01.
- Exception to LR-ISG-2015-01 Table XI.M41-1 recommendation for ACP and cast-iron valves in the makeup water system to be coated.
- Exception to LR-ISG-2015-01 recommendation for backfill procedure to specify that backfill located within 6 inches of the component will meet ASTM D 448-08 size number 67 (size number 10 for polymeric materials). An enhancement has been included to ensure future compliance with LR-ISG-2015-01.
- Exception to NUREG-1801, Section XI.M41 recommendation that inspections of buried and underground piping and tanks commence 10 years prior to the PEO. Due to the expedited timeframe to implement the DCPP Buried and Underground Piping and Tanks AMP, initial inspection will be completed by December 1, 2028.

AMP Exceptions (Electrical)

Inaccessible Power Cables Not Subject to 10 CFR 50.49 EQ Requirements, XI.E3

- Based on the design of the pullboxes, indirect observation that cables, splices, and cable supports are not submerged will be performed annually. Direct observations, required by GALL, Revision 2, are performed as a one-time inspection prior to the PEO and opportunistically in accordance with the Structures Monitoring AMP.
- The intake structure pull boxes will be directly inspected on a refueling outage basis to minimize risk of removing the covers at-power.
- Based on the climate in the vicinity of DCPP, the following exceptions are being proposed:
  - Exception is taken to event-driven inspections for water accumulation in pull boxes.
  - Exception is taken for inspection of dewatering devices (sump pumps) prior to any known or predicted heavy rain or flooding events.

Metal Enclosed Bus, XI.E4

- Exceptions to inspection requirements for the isolated phase bus segments based on the design/configuration of the bus.

AMP Exceptions (Civil)

ASME Section XI, Subsection IWF, XI.S3

- Exception to limit the amount of sulfur used in lubricants consistent with the guidance in the 2019 EPRI Materials Handbook. This exception is requested to allow continued use of lubricants that contain limited amounts of sulfur (molybdenum disulfide will not be used).

Plant Specific AMPs

Periodic Inspections for Selective Leaching

- Manages the loss of material due to selective leaching for the following material/environment combinations that have experienced selective leaching at DCPP:
  - Buried gray cast iron components
  - Aluminum-bronze components in a raw water

Transmission Conductor and Connections, Insulators and Switchyard Bus and Connections

- Manages the aging effects of the 230 kV and 500 kV components required for Station Blackout recovery which include transmission conductors and connections, insulators, and switchyard bus and connections to ensure that these components are capable of performing their intended functions throughout the PEO.

NUREG-1801 AMPs Not Applicable to DCPP

Compressed Air Monitoring (XI.M24)

- DCPP only credits compressed air from accumulators.

Monitoring of Neutron Absorbing Materials Other than Boraflex (XI.M40)

- DCPP uses soluble boron without crediting boron absorbing panels.

Containment Tendon (X.S1)

- Not applicable. The concrete containment building at DCPP is conventionally reinforced. There are no prestressing tendons.

Boraflex Monitoring (XI.M22)

- Not applicable. DCPP has no in-scope boraflex spent fuel storage racks or neutron-absorbing sheets exposed to treated borated water in the spent fuel pool cooling system as discussed in UFSAR Section 9.1.2.3, so the applicable NUREG-1801 line was not used.

Fuse Holders (XI.E5)

- Fuse holders do not meet the screening criteria of NUREG-1801, XI.E5, and the guidance in the NRC letter for identification and treatment of electrical fuse holders for LR. The stand-alone fuse holders are located in stable environments and are not subject to vibration or ohmic heating, and moisture has not been found. Therefore, fuse holders at DCPP are not subject to aging management.

Application Approach to Time Limited Aging Analyses (TLAAs) and Exemptions Identification

- **Search Methods**
  - Methods consistent with NUREG-1800, Revision 2, NEI 95-10, and 10 CFR Part 54
  - Keyword searches of DCPP current licensing basis documents
    - TLAA search and screening performed against requirements in 10 CFR 54.21 and Section 54.3
- **One TLAA supporting plant-specific 10 CFR 50.12 exemptions**
- **Plant Specific TLAAs for DCPP**
  - Crane Load Cycle Limits
  - TLAAs Supporting Repair of Alloy 600 Materials
  - Reactor Coolant Pump Flywheel Fatigue Crack Growth Analysis
  - Inservice Flaw Growth Analyses that Demonstrate Structural Stability for 40 Years
- **25 Total TLAAs**

Application Approach to Operating Experience

- **OE Review Period**
  - January 1, 2013 through February 28, 2023
  - Significant OE through September 1, 2023 will be included in the application
- **DCPP Corrective Action Program (CAP) Database is SAP**
- **Keyword Searches**
  - ~200 age-related and general keywords
  - ~150,000 CAP reports were searched
  - ~9,330 CAP reports (5 or more keyword hits were evaluated)
- **Lessons learned from recent RAIs and supplements are incorporated in AMPs and Aging Management Reviews**
- **GALL-SLR and SLR-ISGs are considered as OE**
- **No new aging effects identified**

Use of SLR Operating Experience Examples

- **Later revisions of EPRI standards endorsed by GALL-SLR**
  - Guidance incorporated in the Flow-Accelerated Corrosion AMP
- **PWR Vessel Internals AMP**
  - Written to SLR-ISG-2021-01-PWRVI requirements, which completely supersedes previous revisions of GALL and LR-ISG-2011-04.

Topic of Interest: LRA References and Implementation Activities

- **References to Previous LR Correspondence**
  - In a few instances, PG&E plans to reference previously withdrawn LR correspondence in the new LRA.
  - Previously referenced correspondence was reviewed and verified to be complete and accurate in accordance with DCPP procedures for outgoing regulatory correspondence.
  - Information is covered by the oath and affirmation signature.
- **Implementation**
  - PG&E is proactively implementing AMPs and commitments included in the new draft DCPP LRA.

Topic of Interest: DCPP License Renewal Commitment Implementation

Nov 2024: Period of Timely Renewal Begins for Unit 1

2023	2024	2025	2026	2027	2028	2029	2030

57% LR commitments implemented (total)

Recurring inspections continue

Additional **34%** Unit 2-specific commitments implemented (total)

Recurring inspections continue

Remaining **9%** of commitments have program implemented

Remaining **9%** of commitments have associated initial inspections/modifications completed

Recurring inspections continue

NRC oversight and on-site presence; existing inspection/maintenance activities continue

First Unit 1 NRC LR Inspection

First Unit 2 NRC LR Inspection

Unit 1 PTR Begins

91% of Unit 1 and Unit common Commitments Complete

Unit 2 PTR Begins

91% of Unit 2 Commitments Complete

PTR: period of timely renewal
LR: License Renewal

Topics of interest: Environmentally Assisted Fatigue (EAF) TLAA

- **NUREG/CR-6260**
  - DCPP analyzed the seven NUREG/CR-6260 locations for an older vintage Westinghouse plant.
    1. Reactor vessel shell and lower head
    2. Reactor vessel inlet nozzles
    3. Reactor vessel outlet nozzles
    4. Pressurizer surge line (hot leg nozzle safe-end)
    5. Charging system nozzle
    6. Safety injection system nozzle
    7. Residual heat removal system piping
  - The methodology and results are provided in the LRA.
  - The LRA contains a commitment for PG&E to perform an additional review to determine whether there are more limiting locations than the NUREG/CR-6260 components for DCPP.
    - Commitment consistent with industry precedent

Break between Safety and Environmental Portion of License Renewal (LR) Pre-Application Submittal Meeting

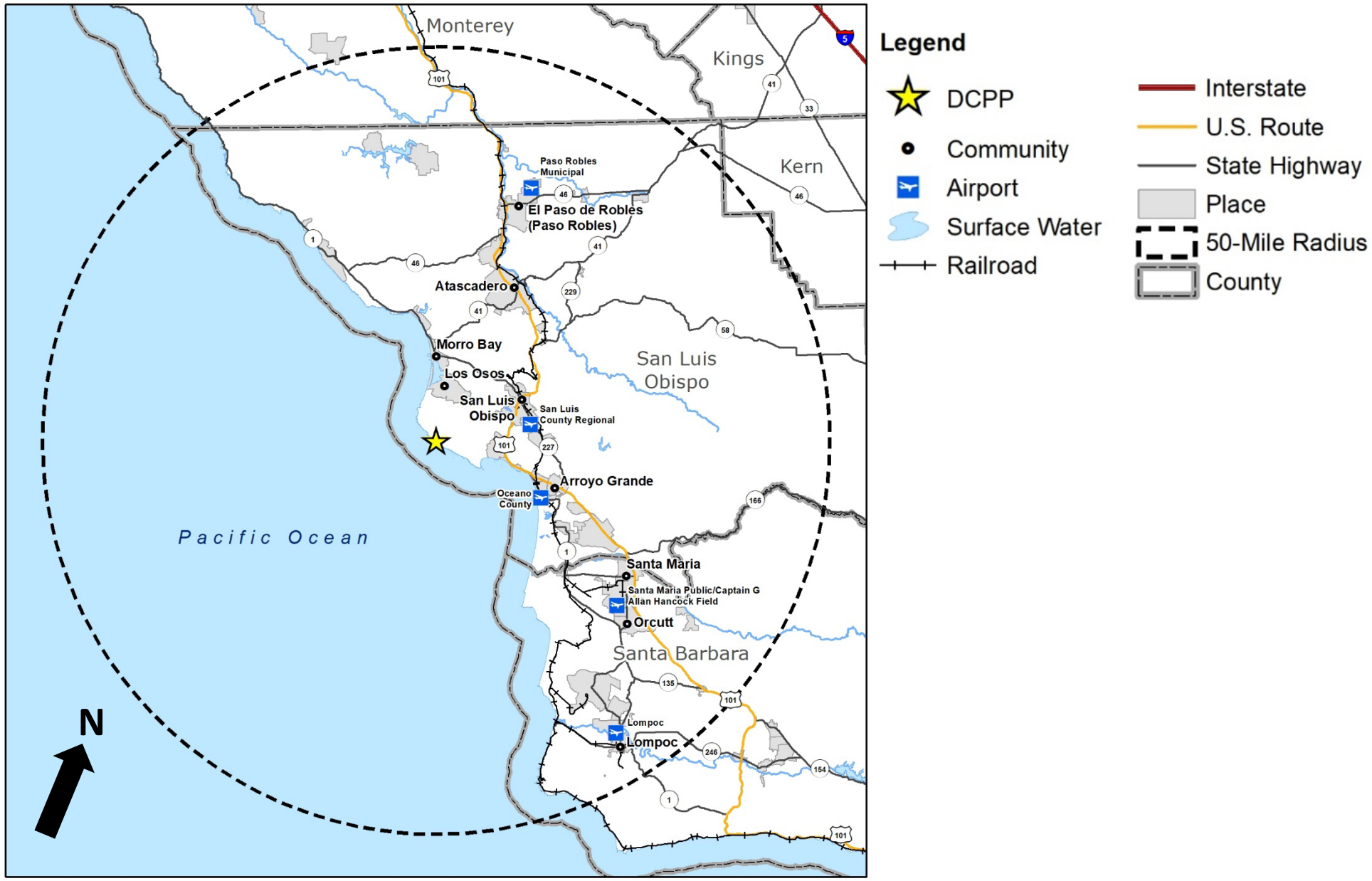
September 13, 2023

Introduction to DCPP – Environmental

- DCPP site consists of approximately 750 acres adjacent to the Pacific Ocean
- No planned changes in operations for the PEO
- In-scope transmission lines are from Power Block to 500 kV and 230 kV switchyards

Intro to DCPP: 6-Mile Vicinity – Environmental

Intro to DCPP: 50-Mile Region – Environmental



Key Discussion Topics: Methodology & Permits / Authorizations – Environmental

- **Methodology**
  - Regulatory
  - Standard practices
  - Incorporate by reference
- **Permits / Authorizations for LRA**
  - 10 CFR 51 (A); Reg Guide 4.2, Sup 1, Rev 1, Section 3.9
  - National Historical Preservation Act Section 106
  - California Public Resources Code Division 6
  - Coastal Zone Management [16 USC 1451]
  - California Natural Resources Agency
  - Endangered Species Act Section 7
  - Clean Water Act Section 401
  - Atomic Energy Act

Key Discussion Topics: Alternatives – Environmental

- **Alternatives Analysis**
  - Reasonable Alternative: Purchased Power
    - Selected as the only reasonable replacement alternative based on its capability to provide reliable baseload power by the operating license expiration dates.
  - However, to provide a fuller comparison a combination alternative is presented in the Environmental Report (ER) which included the following:
    - Wind, 830 MW wind onsite and offsite with battery storage for firm generation
    - Solar Photovoltaic, 1,160 MW offsite with battery storage for firm generation
    - Geothermal, 200 MW
    - Demand Side Management, 100 MWe

Key Topic Discussions: Agency and Tribal Consultations – Environmental

- **Agency consultations are in progress with the following tribes, stakeholders, and regulators**

Agencies	Tribes
California Central Coast Regional Water Quality Control Board	Tule River Indian Tribe
California State Office of Historic Preservation	Santa Ynez Band of Chumash Indians
California Department of Fish and Wildlife	Salinan Tribe of Monterey & San Luis Obispo Counties
California Department of Public Health	Northern Chumash Tribal Council (NCTC)
California State Lands Commission	yak titʸu titʸu yak tiłhini – Northern Chumash Tribe
California Coastal Commission	Chumash Council of Bakersfield
NOAA	Coastal Band of the Chumash Nation
USFWS	Barbareno/Ventureno Band of Mission Indians
NRC	
Bureau of Land Management	

Threatened and Endangered Species

- **Federally Listed California Red-Legged Frog (CRLF) discovered on DCPP Property in 2020 (lower Diablo Creek and Tom's Pond)**
  - There have been no reported observations of this species (CRLF) within the plant operational footprint or observed impacts to (or take of) the species during the current license term.
  - Take avoidance measures have been incorporated into operating procedures for vegetation maintenance activities near habitat areas
  - Anticipate informal Section 7 consultation for continued operations
- **Federally Listed, State Protected Southern Sea Otter frequent the Intake Cove**
  - PG&E holds CDFW collection permit for this species
  - No take anticipated for continued operations

Threatened and Endangered Species

- **Federally Listed Black Abalone subject to NPDES monitoring, no adverse operational impacts or take anticipated**
- **NOAA Fisheries Biological Opinion (2006) determined no operational impacts on the following species:**
  - Guadalupe fur seal, steller sea lion, blue whale, fin whale, sei whale, sperm whale, and humpback whale
- **NOAA Fisheries Biological Opinion (2006) includes provisions for the following species:**
  - Loggerhead turtle, green sea turtle, leatherback turtle, and Pacific olive Ridley turtle
  - Existing Incidental Take Permits Expires on August 26, 2025
- **Anticipate informal Section 7 Consultation between NRC and USFWS regarding CRLF**
- **Anticipate consultation between NRC and NOAA Fisheries to renew Biological Opinion and Sea Turtle Incidental Take Permit**

Essential Fish Habitat (EHF)

- **EFH for the following species is designated within the vicinity of DCPP:**
  - Groundfish, Coastal Pelagic Species, Highly Migratory Species, Pink Salmon, Chinook Salmon, and Coho Salmon
- **Groundfish EFH is protected from fishing**
- **No habitat areas of particular concern (HAPCs) are located within the 6-mile vicinity of DCPP**
- **DCPP maintains control programs for water withdrawal, NPDES discharges, thermal effluents, and wastewater discharges – no effects on EFH are anticipated for continued operations**

Key Discussion Topics: Groundwater Monitoring Program & Spent Fuel Management – Environmental

- **Groundwater Protection Program**
  - DCPP implemented the ground water protection program in 2003
  - Groundwater samples are collected quarterly at 6 on-site wells
  - 2012 study concluded that groundwater from beneath the power block migrates southwesterly to the Pacific Ocean and discharges near Diablo Cove or the intake cove
    - Given the site layout, flow direction, and nearest residence at 1.5 miles north of DCPP, there is no pathway for groundwater at DCPP to impact drinking water supplies
- **Spent Fuel Management**
  - There is enough storage in the existing ISFSI and spent fuel pools to accommodate all fuel through the PEO (60 years of total operation).

Key Discussion Topics: SAMA Update – Environmental

- **Severe Accident Mitigation Alternatives (SAMA) Analysis for DCPP was performed in 2023 using the methodology documented in NEI 05-01**
- **The results are provided in the ER**
  - SAMA Report will be included in the ER

Lessons Learned – Environmental

- **Incorporate lessons learned from previously submitted ER & SAMA analyses into the DCPP ER and basis documents**
  - SAMA Evaluations
  - Agency Consultations
- **Review and incorporate applicable information into DCPP LR ER based on previously submitted LR and SLR ER RAIs (e.g., Comanche Peak, River Bend, Waterford, Turkey Point, Surry, Point Beach)**
- **Engagement in NEI License Renewal Environmental Task Force**
- **Industry peer review provides useful feedback to refine the ER**
- **The most recent 5 years of data, available at the time of development, is included in the environmental report**

License Renewal Pre-Submittal Meeting References – Environmental

References

1. NUREG/BR-0184, “Regulatory Analysis Technical Evaluation Handbook,” U.S. Nuclear Regulatory Commission, 1997 (ML111290858).
2. NUREG-1555, *Standard Review Plan for Environmental Reviews for Nuclear Power Plants*, Supplement 1, *Operating License Renewal, Final Report*, Revision 1 –June 2013, Sections 5.1 and 5.2 (ML13106A246).
3. NEI 17-04, Revision 1, “Model SLR New and Significant Assessment Approach for SAMA,” August 2019 (ML19316C718).
4. U.S. NRC, “Interim Endorsement of NEI 17-04, “Model SLR [Subsequent or Second License Renewal] New and Significant Assessment Approach For SAMA, Revision 1,” Letter from Anna Bradford, Director Division of New and Renewed Licenses Office of NRR to Chris Earls, Senior Director Regulatory Affairs, NEI, December 11, 2019 (ML19323E740).
5. RG 4.2, Supplement 1, Revision 1, “Preparation of Environmental Reports For Nuclear Power Plant License Renewal Applications” June 2013 (ML13067A354).
6. Environmental Review for Renewal of Nuclear Power Plant Operating Licenses, 61 Fed. Reg. 28,467, 28,481 (June 5, 1996).

Discussion & Future Activities

- **NRC Perspective**
  - Good practices from current LR application reviews
- **Portal (e-room) plan**
  - Will provide access to documents for review through a portal
  - PG&E propose file structure; NRC PM and staff provide feedback
  - PG&E conduct an overview (virtual meeting) towards later part of sufficiency review
  - Portal to be made available upon completion of sufficiency review

Closing Remarks

- **DCPP, Units 1 and 2, License Renewal Application**
  - PG&E will submit a high-quality application that meets NRC requirements
  - Will be consistent with industry practices and lessons learned from recent LRs/SLRs
  - DCPP application is on track to be submitted to the NRC by December 31, 2023

Questions?