

which a trip would be actuated is within safety analysis limits.

Therefore, there is no significant increase in the probability of an accident previously evaluated.

The reduction in power measurement uncertainty is bounded by the safety analyses since they were performed or evaluated at 2580.6 MWt. Radiological consequences of [FSAR] Chapter 14 accidents were assessed previously and continue to be bounding. The FSAR Chapter 14 analyses continue to demonstrate compliance with the relevant accident analysis acceptance criteria. Therefore, there is no significant increase in the consequences of any accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

No new accident scenarios, failure mechanisms, or single failures are introduced as a result of the proposed change. All systems, structures and components previously required for the mitigation of an event remain capable of fulfilling their intended design function at the proposed uprated power level. The proposed change has no adverse effects on any safety-related systems or component and does not challenge the performance or integrity of any safety-related system. The proposed variable high power trip allowable value will ensure that the maximum actual steady state power at which a trip would be actuated is within safety analysis limits. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

The maximum steady-state reactor power of 2580.6 MWt assumed in the accident analysis, including uncertainties, remains the same as previously analyzed. Therefore, the change in rated thermal power to 2565.4 MWt does not involve a significant reduction in the margin of safety.

The current accident analyses and system and component analyses had been previously performed at core powers that exceed the proposed measurement uncertainty recapture uprated core power. Evaluations have been performed for analyses that were done at nominal core power and have been found acceptable for the proposed measurement uncertainty recapture power uprate. Analyses of the primary fission product barriers at uprated core powers have concluded that all relevant design basis criteria remain satisfied in regard to integrity and compliance with the regulatory acceptance criteria. As appropriate, all evaluations have been either reviewed and approved by the Nuclear Regulatory Commission or are in compliance with applicable regulatory review guidance and standards. The proposed variable high power trip allowable value will ensure that the maximum actual steady state power at which a trip would be actuated is within safety analysis limits. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this

review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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**Pacific Gas and Electric Company,
Docket Nos. 50-275 and 50-323, Diablo
Canyon Nuclear Power Plant, Unit Nos.
1 and 2, San Luis Obispo County,
California**

Date of amendment requests: May 29, 2003.

Description of amendment requests: The License Amendment Request (LAR) revises TS 3.8.1, "AC Sources—Operating" to allow surveillance testing of the onsite standby emergency diesel generators (DG) during modes in which it is currently prohibited. Specifically, the licensee proposes removing the mode restrictions for the following surveillance requirements (SRs): SR 3.8.1.10 (full load rejection test), SR 3.8.1.13 (protective-trip bypass test), and SR 3.8.1.14 (endurance and margin test). This LAR also incorporates changes included in the NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-283, Revision 3. These changes modify the Notes in SRs 3.8.1.8 (transfer of AC sources test), 3.8.1.9 (post accident load rejection test), 3.8.1.11 (simulated loss of offsite power test), 3.8.1.12 (auto-start on safety injection (SI) signal test), 3.8.1.16 (restoration of loads to offsite power test), 3.8.1.17 (verification of test mode override test), 3.8.1.18 (engineered safety feature and auto-transfer load sequencing test), 3.8.1.19 (loss of offsite power plus SI signal response test), 3.8.4.7 (battery service test), and 3.8.4.8 (battery discharge test) to allow performance of the surveillances in order to reestablish operability following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated operability concerns during plant operation.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed changes do not involve a significant increase in the probability or

consequences of an accident previously evaluated.

The emergency diesel generators (DGs) and their associated emergency loads are accident-mitigating features. As such, testing of the DGs themselves is not associated with any potential accident initiating mechanism. Each DG is dedicated to a specific vital bus and these buses and DGs are independent of each other. There is no common mode failure provided by the testing changes proposed in this license amendment request (LAR) that would cause multiple bus failures. Therefore, there will be no significant impact on any accident probabilities by the approval of the requested amendment.

The design of plant equipment is not being modified by these proposed changes.

The changes include an increase in the online time the DG will be paralleled to the grid in Mode 1 or 2. However, the overall time that the DG is paralleled in all modes (outage/non-outage) should remain unchanged. As such, the ability of the DGs to respond to a design basis accident can be adversely impacted by these proposed changes. However, the impacts are not considered significant based on the ability of the remaining two DGs to mitigate a design bases accident (DBA) or provide a safe shutdown, and data that shows that the DG itself will not perturb the electrical system. Furthermore, the proposed amendments for surveillance requirement (SR) 3.8.1.10 and SR 3.8.1.14 share the same electrical configuration alignment to the current monthly 1-hour loaded surveillance.

For SR 3.8.1.13, the DG would still be able to respond to an auto-start signal were one to be received during testing. The unavailability of the DG during the conduct of this SR 3.8.1.13 is minimal (approximately 5 minutes) and is insignificant from a risk perspective.

In addition, operating experience and evaluation of the probability of a DG being rendered inoperable concurrent with or due to a significant grid disturbance support the conclusion that the proposed changes in this LAR do not involve any significant increase in the likelihood of a safety-related bus blackout.

SR changes that are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-283, Revision 3 have been approved by the NRC and the online tests allowed by the TSTF are only to be performed for the purpose of establishing operability. Performance of these SRs during normally restricted modes will require an assessment to assure plant safety is maintained or enhanced.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different accident from any accident previously evaluated.

The proposed change would create no new accidents since no changes are being made to the plant that would introduce any new accident causal mechanisms. Equipment will be operated in the same configuration currently allowed by other DG SRs that allow