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*NRC Section Chief:* L. Raghavan.

*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:* August 27, 2002.

*Description of amendment requests:* The proposed license amendments would revise the term "minimum measured flow per loop" to "measured loop flow" in the allowable value and nominal trip setpoint for the Reactor Coolant Flow-Low reactor trip function contained in Table 3.3.1-1, "Reactor Trip System Instrumentation," of Technical Specification (TS) 3.3.1. In addition, the proposed amendments would allow for an alternate method for the measurement of reactor coolant system (RCS) total volumetric flow rate through measurement of the elbow tap differential pressures on the RCS primary cold legs. The use of elbow tap differential pressures normalized to Diablo Canyon Power Plant Cycle 1 and 2 precision flow calorimetrics would improve the accuracy of the RCS flow measurement through reduction of the effect of hot leg temperature streaming that is present in the current flow calorimetric method.

*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 change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change revises the Technical Specification (TS) 3.3.1 Table 3.3.1-1 term "minimum measured flow per loop" to "measured loop flow" in the allowable value and nominal trip setpoint for the Reactor Coolant Flow-Low reactor trip function and allows an alternate method for the measurement of reactor coolant system (RCS) total flow to meet TS surveillance requirement (SR) SR 3.4.1.4 through measurement of the elbow tap differential pressures on the RCS primary cold legs.

The change will not increase the probability of an accident previously evaluated because adequate RCS flow will still be assured. The Reactor Coolant Flow-Low reactor trip function allowable value and nominal trip setpoint are accident mitigation functions and are not an accident initiator. The elbow tap method to measure RCS flow and the change to the flow definition associated with the Reactor

Coolant Flow-Low reactor trip function do not involve a plant modification.

For the elbow tap method to measure RCS flow, sufficient margin exists to account for all reasonable instrument uncertainties and therefore the RCS flow will continue to be maintained at a value which is bounded by the design basis accident initial conditions. The change to the flow definition associated with the Reactor Coolant Flow-Low reactor trip function allowable value and nominal trip setpoint does not change a design basis accident initial condition or the conditions at the time of reactor trip during a design basis accident and therefore has no adverse effect on the design basis accidents which credit the Reactor Coolant Flow-Low reactor trip setpoint.

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

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to the flow definition associated with the Reactor Coolant Flow-Low reactor trip function allowable value and nominal trip setpoint and the proposed elbow tap method to measure RCS flow will not create the possibility of a new or different type of accident from any previously evaluated. There are no physical changes being made to the plant and there are no changes in operation of the plant that could introduce a new failure mode, creating an accident which has not been evaluated.

Therefore, the proposed change does not create the possibility of a new or different accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed change to the flow definition associated with the Reactor Coolant Flow-Low reactor trip function allowable value and nominal trip setpoint and the proposed elbow tap method to measure RCS flow will not reduce the margin of safety. For the proposed elbow tap flow method, sufficient margin exists to account for all reasonable instrument uncertainties and thus the RCS flow will continue to be maintained at a value which is bounded by the design basis accident initial conditions, and no adverse effect on the plant response to design basis accidents is created. The change in the flow definition associated with the Reactor Coolant Flow-Low reactor trip function allowable value and nominal trip setpoint does not change a design basis accident initial condition or the conditions at the time of reactor trip during a design basis accident, and therefore has no effect on the plant response to design basis accidents which credit the Reactor Coolant Flow-Low reactor trip setpoint. Since the change does not affect the response to design basis accidents, it does not result in a decrease in departure from nucleate boiling margin or reactor coolant system peak pressure margin for the design basis accidents.

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 requests involve no significant hazards consideration.

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*NRC Section Chief:* Stephen Dembek.

*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:* November 1, 2002.

*Description of amendment requests:* The proposed license amendments would revise Technical Specification (TS) 3.3.1, "Reactor Trip System (RTS) Instrumentation," and TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation" as follows: (1) Revise both the RTS and ESFAS instrumentation TS and TS Bases to change or clarify the allowances for bypassing and tripping tested channels with other channels inoperable; (2) remove Surveillance Requirement 3.3.1.10 from Function 16.b, "Turbine Stop Valve Closure;" (3) correct the nominal trip setpoint value for Function 16.b, "Turbine Stop Valve Closure;" (4) correct the allowable value for the Function 18.f, "Turbine Impulse Chamber Pressure, P-13;" and (5) remove and relocate the nonsafety-related turbine trip function from Function 5 of Table 3.3.2-1, "Turbine Trip and Feedwater Isolation." This function will be relocated to other owner-controlled documents.

*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 change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes in the required action statements in the Limiting Conditions for Operation (LCOs) for the allowable surveillance testing configurations for both the reactor trip system (RTS) and engineered safety feature actuation system (ESFAS) instruments will not change the probability or consequences of an accident previously evaluated.

The proposed surveillance testing configuration changes only clarify available surveillance testing configurations and