



**Pacific Gas and
Electric Company**

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PG&E Letter DCL-99-168

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Supplement to 180 Day Response to NRC Generic Letter 99-02, "Laboratory
Testing of Nuclear-Grade Charcoal"

Dear Commissioners and Staff:

NRC Generic Letter (GL) 99-02 was issued on June 3, 1999, to alert licensees that the NRC has determined that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with the current licensing basis as it relates to the dose limits of General Design Criterion 19 of Appendix A to 10 CFR 50, and Subpart A of 10 CFR Part 100. The GL also requested that licensees determine whether their technical specifications (TS) reference ASTM D3803-1989 for charcoal filter laboratory testing. Licensees whose TS do not reference ASTM D3803-1989 should either amend their TS to reference ASTM D3803-1989, or propose an alternative test protocol and provide the information discussed in the GL requested actions.

In PG&E letter DCL-99-150, "180 Day Response to NRC Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Charcoal," dated November 24, 1999, PG&E stated that the Diablo Canyon Power Plant (DCPP) TS require that nuclear grade charcoal in the engineered safety feature systems be tested in accordance with the requirements of ASTM D3803-1989, and that no TS amendment or additional testing are required. The reference to ASTM D3803-1989 was incorporated in the TS by Amendments 113 and 111 to Facility Operating License Nos. DPR-80 and DPR-82, respectively, dated May 28, 1996. The improved TS, issued May 28, 1999, by Amendments 135 and 135, also reference ASTM D3903-1989.

The test parameters listed in Requested Action 1 of the GL are specified in the TS and/or in ASTM D3803-1989, Table 1, "Parameter Specifications." At the request of the NRC Project Manager for DCPP, they are provided in the enclosed table.

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If you have any further questions regarding the current DCPD requirements for laboratory testing of nuclear-grade charcoal, please call Mr. Patrick Nugent at (805) 545-4872.

Sincerely,

A handwritten signature in black ink, appearing to read "D H Oatley". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

David H. Oatley

cc: Edgar Bailey, DHS
Steven D. Bloom
Ellis W. Merschoff
David L. Proulx
Diablo Distribution

Enclosure

TEST PARAMETERS FOR CHARCOAL FILTER MEDIA

Test Parameter	Control Room Filter Bk	Auxiliary Building Filtr Bank	Fuel Handling Building
Pressure	101 kPa	101 kPa	101 kPa
Temperature	30 °C	30 °C	30 °C
Velocity	12.2 mpm	12.2 mpm	12.2 mpm
Relative Humidity	70%	70%	95%
Methyl iodide Concentration	1.75 mg/m ³	1.75 mg/m ³	1.75 mg/m ³
Bed Depth	50 mm	50 mm	50 mm
Test Limit (Penetration)	1%	6%	4.3%
Equilibration	18 hours	18 hours	18 hours
Challenge	60 min	60 min	60 min
Elution	60 min	60 min	60 min
Test Standard	ASTM D3803-1989	ASTM D3803-1989	ASTM D3803-1989
Exception to Standard	70% RH	70% RH	None