



October 27, 2014

10 CFR 50.90

PG&E Letter DCL-14-093

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

Diablo Canyon Units 1 and 2
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82

Revision to Response Date for NRC Request for Additional Information – Fire
Modeling 3 - National Fire Protection Association Standard 805

Reference:

1. NRC Letter, "Diablo Canyon Power Plant, Units 1 and 2 – Request for Additional Information Re: License Amendment Request to Adopt National Fire Protection Association Standard 805 (TAC Nos. MF2333 and MF2334)," dated July 31, 2014

Dear Commissioners and Staff:

In Reference 1, the NRC provided a request for additional information (RAI) regarding Pacific Gas and Electric Company's (PG&Es) license amendment request (LAR) to adopt National Fire Protection Association Standard 805. The RAI questions were discussed in draft form in a teleconference on July 8, 2014, and during an audit performed at Diablo Canyon Power Plant during the week of July 14-18, 2014.

On October 16, 2014, PG&E discussed with NRC Staff moving the response to Fire Modeling (FM) RAI 3.b from the 90-day response letter to the 120-day response letter. PG&E agreed to provide the reason for changing the response date in a letter.

The reason for the change in the response date is as follows:

The only fire modeling tool used that was not explicitly listed in Attachment J of the LAR is Consolidated Model of Fire and Smoke Transport (CFAST). CFAST was used to analyze the hot gas layer (HGL) for a catastrophic turbine generator (TG) fire within fire zones 14-D and 19-D. CFAST was also used to model thermocouple targets at critical locations to analyze the



temperature where structural steel is exposed.

The verification and validation (V&V) basis for HGL calculations using CFAST was provided in the LAR. The V&V basis for thermocouple targets was not provided in the LAR.

During review of the V&V basis for the use of thermocouple targets in CFAST, one of the limitations of CFAST (specifically flame height to ceiling height ratio) was identified as being outside the range of limitation for CFAST V&V.

In order to properly address the concern, PG&E elected to use Fire Dynamics Simulator (FDS) as a FM tool to perform a sensitivity analysis of the TG fire scenario. This analysis is a complex simulation using computational fluid dynamics FM software that requires additional time to perform. The sensitivity analysis making use of this FM tool (FDS) is not yet complete.

Consistent with other RAI responses, all subparts of FM RAI 3 will be submitted within the same RAI response letter. Therefore, PG&E will provide the response to FM RAI 3 with the other 120-day RAI responses due to the additional analysis being performed to respond to FM RAI 3.b.

PG&E makes no regulatory commitments (as defined by NEI 99-04) in this letter. This letter includes no revisions to existing regulatory commitments.

If you have any questions or require additional information, please contact Mr. Tom Baldwin at 805-545-4720.

I state under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2014.

Sincerely,

Barry S. Allen
Site Vice President



mjrm/4557/50037411

cc: Diablo Distribution
Marc L. Dapas, NRC Region IV Administrator
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