

July 25, 2018

PG&E Letter DCL-18-056
PG&E Letter DIL-18-009

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

10 CFR 50.54, 10 CFR 72.32

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Docket No. 72-26, Materials License No. SNM-2511
Diablo Canyon Independent Spent Fuel Storage Installation
Emergency Plan Implementing Procedure Update

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54(q)(5) and the requirements of 10 CFR 72.32, Pacific Gas and Electric Company (PG&E) is providing a summary of the analysis of changes to Emergency Plan (E-Plan) Implementing Procedure OM10.ID1, "Maintaining Emergency Preparedness."

The associated enclosures are listed below:

- Enclosure 1 - Diablo Canyon Power Plant Emergency Plan Implementing Procedures, Revision Numbers for Emergency Plan Implementing Procedures
- Enclosure 2 - Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 18, "Maintaining Emergency Preparedness"

PG&E evaluated the changes for a reduction in effectiveness, as defined in 10 CFR 50.54(q), and concluded that the changes do not reduce the effectiveness of the E-Plan. The E-Plan continues to meet the requirements in Appendix E of 10 CFR 50 and the planning standards of 10 CFR 50.47(b). Therefore, prior NRC approval of the associated changes was not required.



This update does not contain any privacy and proprietary information in accordance with NRC Generic Letter 81-27, "Privacy and Proprietary Material in Emergency Plans."

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If there are questions regarding this update, please contact me at (805) 545-3446.

Sincerely,

Michael A. Ginn
Emergency Planning Manager

armb/4743/50986332

Enclosures

cc/enc: William C. Allen, NMSS Project Manager
Kriss M. Kennedy, NRC Region IV Administrator
Christopher W. Newport, NRC Senior Resident Inspector
Balwant K. Singal, NRC Senior Project Manager
Senior Emergency Preparedness Inspector (RGN-IV/DR)

Enclosure 1
PG&E Letter DCL-18-056
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**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

Revision Numbers for Emergency Plan Implementing Procedures

**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

<u>Proc. No.</u>	<u>Rev.</u>	<u>Title</u>
OM10.ID1	18*	Maintaining Emergency Preparedness
OM10.DC1	9	Emergency Preparedness Drills and Exercises
EP G-1	44	Emergency Classification and Emergency Plan Activation
EP G-2	50	Interim Emergency Response Organization
EP G-3	59	Emergency Notification of Off-Site Agencies
EP G-4	30	Assembly and Accountability
EP G-5	14	Evacuation of Non-Essential Site Personnel
EP OR-3	10	Emergency Recovery
EP RB-1	8	Personnel Dosimetry
EP RB-2	8	Emergency Exposure Guides
EP RB-3	7	Stable Iodine Thyroid Blocking
EP RB-4	5	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	8	Alternate Personnel Decontamination Facilities
EP RB-8	29	Instructions for Field Monitoring Teams
EP RB-10	20	Protective Action Recommendations
EP RB-12	12	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	10	Core Damage Assessment Procedure
EP RB-14A	2	Initial Detection of Fuel Cladding Damage
EP RB-15	15	Post Accident Sampling System
EP RB-16	15	Operating Instructions for the EARS Computer Program
EP RB-17	0	Operation Instructions for QuickDose
EP R-2	35	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	9	Release of Radioactive Liquids
EP R-7	18	Off-Site Transportation Accidents
EP EF-1	54	Activation and Operation of the Technical Support Center
EP EF-2	40	Activation and Operation of the Operational Support Center
EP EF-3	45	Activation and Operation of the Emergency Operations Facility
EP EF-4	21	Activation of the Off-Site Emergency Laboratory
EP EF-9	12	Backup Emergency Response Facilities
EP EF-10	17	Activation and Operation of the Joint Information Center
EP EF-11	2	Alternate Emergency Response Facilities / Incident Command Post (ICP)

***Revised Document**

**Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure OM10.ID1, Revision 18, “Maintaining
Emergency Preparedness”**

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 18

Change	Original Content	Content Change	Reason for Change
1	N/A – added new content	5.2.3.c. Radiological emergency response training is provided to those who may be called on to assist in an emergency. ^{T00747}	Added new content. This change adds in a new step to close a gap for training of personnel who may be called upon to assist in an emergency at Diablo Canyon Power Plant (DCPP). The addition of this step does not create any new training requirements or expand the pool of potential people requiring training. This change does not result in the need to revise any part of the DCPP E-Plan or any other E-Plan procedure. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
2	N/A – added new content	5.2.3.d. Specialized training and periodic retraining in the categories in part NUREG-0654 part O.4.a - O.4.j. is provided. ^{T36234}	Added new content. This change adds in a new step to close a gap for specialized training of personnel who may be called upon to assist in an emergency at DCPP. The addition of this step does not create any new training requirements or expand the pool of potential people requiring training. This change does not result in the need to revise any part of the DCPP E-Plan or any other E-Plan procedure. This change does not affect how the current E-Plan meets any planning standard functions,

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 18

Change	Original Content	Content Change	Reason for Change
			elements, or site-specific commitments. No additional evaluation required.
3	N/A – added new content	5.3.2.a. During drills, if appropriate, on-the-spot correction of incorrect performance is made and demonstration of the proper performance offered by the instructor. ^{T36233}	Added new content. This change adds in a new step to close a gap for correcting performance issues during drills. The addition of this step does not create any new drill and exercise program requirements. This change does not result in the need to revise any part of the DCPP E-Plan or any other E-Plan procedure. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
4	5.9 <u>Annual Review of Support Agreements</u> ^{T36206}	5.9 <u>Annual Review of Support Agreements</u>	Modified existing content. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
5	N/A – added new content	5.9.1 Letters of Agreement for services are maintained with the organizations listed below: ^{T36206} <ul style="list-style-type: none"> • Cambria Community Healthcare District • CALFIRE / San Luis Obispo County Fire Dept. 	Added new content. This change adds in a new step for listing agencies DCPP maintains agreements with. The addition of this step does not create any new letter of agreement requirements. This change does not result in the need to revise any part of

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 18

Change	Original Content	Content Change	Reason for Change
		<ul style="list-style-type: none"> • Department of California Highway Patrol • DOE Oak Ridge Operations Office • French Hospital Medical Center • INPO Nuclear Power Plant Agreement • Marian Regional Medical Center • PG&E Company Helicopter Operations Department • San Luis Ambulance Service, Inc. • United States Coast Guard 	<p>the DCPP E-Plan or any other E-Plan procedure.</p> <p>The content for this new step is copied from E-Plan section 5.12.2.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
6	<p>5.9.1</p> <p>All emergency preparedness support agreements shall be reviewed annually.</p> <p>a. Document the review of each agreement with a letter to file.</p> <p>b. Update or renew all agreements expiring prior to the next year's scheduled review.</p> <p>c. Update the Emergency Plan during the next revision to reflect the current contracts or agreements.</p>	<p>5.9.2</p> <p>All emergency preparedness support agreements shall be reviewed annually. ^{T36206}</p> <p>a. Perform review per AWP EP-007, "Updating Letters of Agreement."</p> <p>b. Ensure each agreement includes:</p> <p>1. A description of responsibility including during hostile actions.</p> <p>2. When the support or service will be provided.</p> <p>3. How the support or service will be initiated.</p>	<p>Added new content.</p> <p>Added steps 5.9.2.a. – 5.9.2.b.6 to provide improved instructions on how the annual reviews of the letters of agreement are performed. Items from 5.9.2.b.1 - 5.9.2.b.6 were taken from E-Plan section 8.6.</p> <p>The addition of this content to step 5.9.2 does not create any new letter of agreement requirements. This change does not result in the need to revise any part of the DCPP E-Plan or any other E-Plan procedure.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 18

Change	Original Content	Content Change	Reason for Change
		<p>4. Prior recognition by both parties that a prompt, effective response will be initiated.</p> <p>5. The degree of emergency preparedness that response organization must continuously maintain in order to be capable of carrying out the obligation when the mobilization request occurs.</p> <p>6. The identification of points of contact and telephone numbers for requesting assistance and verifying requests.</p> <p>c. Document the review of each agreement with a letter to file.</p> <p>d. Update or renew all agreements expiring prior to the next year's scheduled review.</p> <p>e. Update the Emergency Plan during the next revision to reflect the current contracts or agreements.</p>	
7	<p>Attachment 7: Page 1 of 3</p> <p>Full Scale Drills</p>	<p>Attachment 7: Page 1 of 3</p> <p>Full Scope Drills</p>	<p>Modified existing content.</p> <p>Changed "full scale" to "full scope" to align OM10.ID1 with the drill and exercise procedure nomenclature in E-Plan section 8.3.1 and OM10.DC1.</p> <p>The terms are synonymous and as such this is a title change only.</p>

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure OM10.ID1, Revision 18

Change	Original Content	Content Change	Reason for Change
			This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.