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December 7, 2012

PG&E Letter DCL-12-125

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

10 CFR 50.73

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Licensee Event Report 1-2012-007-00, Inadequately Compensated Non-Conformances in the Fire Protection Program

Dear Commissioners and Staff:

Pacific Gas and Electric Company (PG&E) is submitting the enclosed Licensee Event Report (LER) identifying fire areas that did not conform to 10 CFR 50, Appendix R requirements and did not have established, proceduralized, or practiced compensatory measures in place. PG&E is submitting this LER in accordance with 10 CFR 50.73(a)(2)(ii)(B).

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

This event did not adversely affect the health and safety of the public.

Sincerely,

for

Barry S. Allen

wrl8/6980/50517211
Enclosure
cc/enc: Elmo E. Collins, NRC Region IV
Thomas R. Hipschman, NRC Senior Resident Inspector
Joseph M. Sebrosky, NRR Senior Project Manager
INPO
Diablo Distribution

NRC FORM 366 (10-2010) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2013

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Diablo Canyon Power Plant, Unit 1	05000-275	1 OF 5

4. TITLE

Inadequately Compensated Non-Conformances in the Fire Protection Program

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									Diablo Canyon, Unit 2	05000-323
10	08	2012	2012	- 007 -	00	12	7	2012	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE

1

10. POWER LEVEL

100

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check all that apply)*

- ☐ 20.2201(b)
- ☐ 20.2201(d)
- ☐ 20.2203(a)(1)
- ☐ 20.2203(a)(2)(i)
- ☐ 20.2203(a)(2)(ii)
- ☐ 20.2203(a)(2)(iii)
- ☐ 20.2203(a)(2)(iv)
- ☐ 20.2203(a)(2)(v)
- ☐ 20.2203(a)(2)(vi)
- ☐ 20.2203(a)(3)(i)
- ☐ 20.2203(a)(3)(ii)
- ☐ 20.2203(a)(4)
- ☐ 50.36(c)(1)(i)(A)
- ☐ 50.36(c)(1)(ii)(A)
- ☐ 50.36(c)(2)
- ☐ 50.46(a)(3)(ii)
- ☐ 50.73(a)(2)(i)(A)
- ☐ 50.73(a)(2)(i)(B)
- ☐ 50.73(a)(2)(i)(C)
- ☐ 50.73(a)(2)(ii)(A)
- ☑ 50.73(a)(2)(ii)(B)
- ☐ 50.73(a)(2)(iii)
- ☐ 50.73(a)(2)(iv)(A)
- ☐ 50.73(a)(2)(v)(A)
- ☐ 50.73(a)(2)(v)(B)
- ☐ 50.73(a)(2)(v)(C)
- ☐ 50.73(a)(2)(v)(D)
- ☐ 50.73(a)(2)(vii)
- ☐ 50.73(a)(2)(viii)(A)
- ☐ 50.73(a)(2)(viii)(B)
- ☐ 50.73(a)(2)(ix)(A)
- ☐ 50.73(a)(2)(x)
- ☐ 73.71(a)(4)
- ☐ 73.71(a)(5)
- ☐ OTHER

Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME	TELEPHONE NUMBER *(Include Area Code)*
Wilbert R. Landreth, Regulatory Services Engineer	(805) 545-6980

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

☑ YES *(If yes, complete 15. EXPECTED SUBMISSION DATE)* ☐ NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR
01	31	2013

ABSTRACT *(Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)*

On October 8, 2012, Pacific Gas and Electric Company (PG&E) identified fire areas that did not conform to 10 CFR 50, Appendix R requirements and did not have established, proceduralized, or practiced compensatory measures in place. PG&E identified these concerns in the course of responding to requests for information and questions from NRC inspectors conducting a triennial fire protection inspection. On October 9, 2012, at 16:30 PDT, PG&E reported these concerns to the NRC via Event Notification (EN) Number 48395. On October 31, 2012, PG&E provided an update to NRC EN Number 48395 identifying that several alternate compensatory measures were not in plant procedure, CP M-10, "Fire Protection of Safe Shutdown Equipment." PG&E is currently evaluating this further and will provide the conclusions in a supplemental report.

PG&E established compensatory actions in accordance with the Diablo Canyon Power Plant Fire Protection Program requirements and plant procedures on discovery of each condition. Also, PG&E reviewed the extent of this condition and identified no additional issues.

PG&E will provide the cause and corrective actions in a supplemental report.

NARRATIVE

I. Plant Conditions

At the time of the event, Units 1 and 2 were in Mode 1 (Power Operation) at approximately 100 percent reactor [RCT] power with normal operating reactor coolant temperature and pressure.

II. Problem Description

A. Background

The Diablo Canyon Power Plant (DCPP) Fire Protection Program maintains the design, procedures and equipment necessary for fire prevention, detection, suppression, and separation of redundant safe shutdown (SSD) equipment and cabling [CBL]. Through implementation of the Fire Protection Program, DCPP is assured of being able to achieve and maintain SSD of the plant in the event of a fire.

DCPP's licensing basis includes the following requirements of 10 CFR 50, Appendix R, Sections III.G, "Fire Protection of Safe Shutdown Capability," and III.L, "Alternative and Dedicated Shutdown Capability:"

• Fire protection of SSD capability, including equipment, component, and cable separation, to ensure that the minimum equipment necessary to obtain SSD is available, despite the effects of a postulated fire.

• Alternative or dedicated means to support SSD when the potential exists for fire damage to redundant SSD components with, or without, loss of offsite power.

Pacific Gas and Electric Company (PG&E) committed to adopt National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," 2001 Edition, in accordance with 10 CFR 50.48(c) for DCPP Units 1 and 2, and submit the associated license amendment request by June 28, 2013. At the start of DCPP's NFPA 805 transition in December 2005, fire protection regulatory standards regarding circuit failure issues and multiple spurious operations (MSOs) were still being developed. As a result, PG&E concluded that MSOs were not part of the current licensing basis for Appendix R SSD analysis, and that MSO issues would be tracked and addressed as a part of the NFPA 805 transition. MSOs identified during this transition period were reviewed by an expert panel and the credible scenarios were incorporated into the SSD analysis and plant procedures. PG&E implemented compensatory measures, as recommended by the expert panel, until the MSOs can be resolved via the Risk Evaluation process in NFPA 805. PG&E continues to use this process for any newly identified MSOs. PG&E is currently evaluating the past implementation of this process further and will provide the conclusions in a supplemental report.

During this NFPA 805 transition period, PG&E performed additional circuit analysis for SSD. PG&E identified variances from deterministic requirements (VFDRs). VFDRs are design aspects that potentially impact current 10 CFR 50, Appendix R compliance and SSD. The NFPA transition process now requires PG&E to review each VFDR and evaluate whether the VFDR resulted in nonconformance to the Appendix R design requirements. PG&E had not established this VFDR review process until 2010. VFDRs determined to be nonconforming to

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
		YEAR	SEQUENTIAL NUMBER	REV NO.	
Diablo Canyon Power Plant, Unit 1	05000-275	2012	- 007	- 00	3 OF 5

NARRATIVE

Appendix R require compensatory measures in accordance with DCPP Equipment Control Guideline (ECG) 18.7.1, "10 CFR 50 Appendix R Fire Rated Assemblies."

B. Event Description

On October 8, 2012, during the review of NFPA 805 VFDRs, PG&E identified fire areas that did not conform to 10 CFR 50, Appendix R requirements and did not have established, proceduralized, or practiced compensatory measures in place. PG&E identified these concerns in the course of responding to requests for information and questions from NRC inspectors conducting a triennial fire protection inspection. One of the concerns PG&E identified was the potential to lose both trains of heating, ventilation and air conditioning [VK] to the 480-volt switchgear and battery [BTRY]/inverter [INVT] rooms in the event of a fire. PG&E originally identified this concern on September 9, 2008; however, PG&E did not implement compensatory measures or make the necessary changes to the SSD analysis or procedures. PG&E also identified the potential to lose all reactor coolant pump (RCP) [P] seal [SEAL] cooling in the event of a fire. PG&E originally identified and evaluated this MSO concern and implemented a compensatory measure in 2008. However, the time-critical operator action did not properly account for the time it would take to traverse through the area in which the fire occurred. PG&E identified the potential to lose the ability to trip the running RCPs in the event of fire. This was not addressed by the current SSD analysis or compensatory measure for the area. On October 9, 2012, at 16:30 PDT, PG&E reported these concerns to the NRC via Event Notification (EN) Number 48395.

On October 23, 2012, the NRC Triennial Fire Protection Inspection team postulated a MSO scenario that could result in steam generator (SG) [SG] overfill. DCPP SSD analysis credits manual closure of the main steam isolation valves [ISV] to isolate steam supply to the main feedwater pumps. However, the time it would take to complete these manual actions could exceed the time to prevent SG overfill. Compensatory actions had already been established prior to identifying this concern.

On October 31, 2012, PG&E provided an update to NRC EN Number 48395 identifying that several alternate compensatory measures were not in plant procedure, CP M-10, "Fire Protection of Safe Shutdown Equipment." PG&E is currently evaluating this further and will provide the conclusions in a supplemental report.

On November 1, 2012, PG&E identified a MSO that could result in the loss of control of the RCP seal charging flow control valve [FCV] or fail the valve in the open position. The Appendix R SSD analysis credits an operator action to open the valve's breaker [BKR] and control the valve from the hot shutdown panel [PL]. However, opening the breaker is not adequate as an additional hot short could prevent the control of the valve. Compensatory actions had already been established prior to identifying this concern.

PG&E established compensatory actions in accordance with the DCPP Fire Protection Program requirements and plant procedures upon discovery of each condition that did not already have one established. Also, PG&E reviewed the extent of these conditions and identified no additional issues.

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
		YEAR	SEQUENTIAL NUMBER	REV NO.	
Diablo Canyon Power Plant, Unit 1	05000-275	2012	- 007	- 00	4 OF 5

NARRATIVE

C. Status of Inoperable Structure, Systems, or Components That Contributed to the Event

None.

D. Other Systems or Secondary Functions Affected

None.

E. Method of Discovery

The concerns were discovered during the response to requests for information and questions from the NRC inspectors conducting DCPP's 2012 Triennial Fire Protection Inspection.

F. Operator Actions

Operators established fire watches as compensatory measures as required by the DCPP Fire Protection Program requirements.

G. Safety System Responses

None.

III. Cause of the Problem

PG&E will provide the cause in a supplemental report.

IV. Assessment of Safety Consequences

PG&E's risk assessment for the applicable fire areas concluded that these concerns were not risk significant and did not adversely affect the health and safety of the public.

V. Corrective Actions

A. Immediate Corrective Actions

PG&E established compensatory measures in accordance with ECG 18.7.1 on the date each concern was identified. PG&E established 1-hour roving fire watches in the areas with the potential for a fire scenario to cause a condition where there are no current actions to mitigate the respective concerns in the SSD procedures.

B. Other Corrective Actions

PG&E will provide the corrective actions in a supplemental report.

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
		YEAR	SEQUENTIAL NUMBER	REV NO.	
Diablo Canyon Power Plant, Unit 1	**05000-275**	**2012**	**- 007 -**	**00**	**5 OF 5**

NARRATIVE

VI. Additional Information

A. Failed Components

None.

B. Previous Similar Events

None.

C. Industry Reports

None.