

**From:** [Sebrosky, Joseph](#)  
**To:** [Sebrosky, Joseph](#)  
**Subject:** RE: meeting to discuss status of Diablo license amendments for seismic  
**Date:** Tuesday, December 03, 2013 7:19:16 AM

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-----Original Appointment-----

**From:** Sebrosky, Joseph  
**Sent:** Wednesday, February 08, 2012 8:53 AM  
**To:** Sebrosky, Joseph; O'Keefe, Neil; Wang, Alan; Markley, Michael; Farnholtz, Thomas; Denissen, Christie  
**Cc:** Peck, Michael  
**Subject:** meeting to discuss status of Diablo license amendments for seismic  
**When:** Wednesday, February 08, 2012 1:00 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** phone call

The email below provides details regarding a call between Mike Markley and Neil O'Keefe to discuss the status of the Diablo seismic license amendment acceptance review. It is hoped that both Tom Farnholtz and Christie Denissen can also participate. A bridge has been line has been arranged. The number to dial is 888-677-0690 and the passcode is (b)(6)

Purpose:

- 1) To discuss the possibility that the Diablo Canyon 10/20/11 license amendment to revise the seismic licensing basis will be rejected in whole or in part by headquarters
- 2) To gain alignment between RIV DRP, RIV DRS, and NRR DORL branch management regarding the ramifications of rejecting the application
- 3) Identify steps forward

Outcome:

- 1) Clear understanding of the current status of the license amendment acceptance review
- 2) Alignment on ramifications of rejecting the application
- 3) Steps forward identified

Agenda:

1. Background
  - a. Briefing today of DORL senior management to provide them with the status of the acceptance review and other Diablo seismic issues. Agenda for this briefing is found below
  - b. Prior to the briefing DORL branch management would like RIV insights regarding the ramifications of rejecting the Diablo license amendment



- iii. Allegation information
- iv. Non-concurrence on Region IV inspection report associated with seismic operability evaluation
  - b. ongoing licensee efforts
- II. Shoreline report
  - a. Received January 2011
  - b. Center for Nuclear Waste Regulatory Analyses report received 2/3/2012
    - i. Concludes that the PGE report provides a comprehensive summary and assessment of the available geologic, geophysical, and seismological data used to evaluate the seismic hazard the shoreline fault poses to DCPD
    - ii. Report is sufficient to allow PG&E reasonable and defensible technical conclusions
    - iii. Center report will be folded into Research information letter (RIL)
      - c. Target date for RIL issuance is 2/2012
      - i. RIL will serve as basis for public meeting in the Spring time frame
  - III. Status of license amendment to revise seismic licensing basis
    - a. Received 10/20/11
      - i. LAR would provide process for addressing new seismic information
      - ii. Clarify the DCPD safe shutdown earthquake as the 1977 Hosgri earthquake (HE) fault line as the equivalent DCPD safe shutdown earthquake
    - b. Supplemented on December 6, 2011, to provide SRP comparison tables
      - i. Identifies areas where the LAR does not meet current SRP guidance
      - c. Staff plans to reject in whole or in part the LAR on the following bases:
        - i. LAR does not meet the provisions in the new SRP
        - ii. Reevaluation of the RCS for the seismic and LOCA loads not yet completed
          - 1. Inappropriate to complete the LAR review without knowing the results of this reanalysis
        - iii. Licensee has not provided a seismic PRA
      - d. Decision needs to be made on whether to fully reject or partially reject submittal

- i. Rejecting submittal in whole or in part will complicate operability review
- ii. Fukushima proposed 50.54 letter will address seismic issues
- 1. Licensee believes the 50.54 requirements will be less restrictive than what they are proposing
- IV. Allegation – background and status
  - a. Basis for closing out allegation will be RIL and center reports
- V. Region IV nonconcurrency on Diablo Canyon Seismic operability evaluation
  - a. Non concurrence on inspection report followup associated with a nonconformance documented in IR 2011-005
    - i. Previous nonconcurrency associated with issue resolved on 11/9/11
      - 1. Resolution referenced LAR
      - ii. New nonconcurrency based on proposed RIV inspection report
    - b. Non-concurrency bases is that the licensee's prompt operability determination (POD) of the shoreline fault inadequate
      - i. POD failed to demonstrate that the RCS pressure boundary would be maintained following an DDE (Diablo licensing basis equivalent of a Safe shutdown earthquake)
      - ii. POD failed to demonstrate equipment necessary to prevent or mitigate an accident would remain functional following an SSE
      - iii. States an inoperable conclusion does not necessarily equate to an unsafe condition
  - c. Region IV and headquarters view
    - i. No information to suggest that there is an immediate threat to public health and safety that would necessitate declaring any seismically non-conforming SSC inoperable
    - ii. Licensee's current actions meet the Part 9900 guidance for having reasonable assurance of operability, pending further evaluation
    - iii. Act of gaining NRC approval through above LAR facilitates the ability to assess operability
    - d. If LAR is rejected in whole or in part – path forward to resolve non concurrence is complicated
- VI. Ongoing licensee efforts

a. Licensee continues to work with California Coastal Commission and USGS to update seismic information

b. Status of efforts and interested stakeholders interactions

VII. Next steps

VIII. Wrapup