



**Pacific Gas and Electric Company**

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August 2, 2012

PG&E Letter DCL-12-069

10 CFR 50.90

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

Submittal of Quality Assurance Plan and Revised Phase 1 Documents for the License Amendment Request for Digital Process Protection System Replacement

- References:
1. PG&E Letter DCL-11-104, "License Amendment Request 11-07, Process Protection System Replacement," dated October 26, 2011 (ADAMS Accession No. ML11307A331).
  2. Digital Instrumentation and Controls DI&C-ISG-06 Task Working Group #6: "Licensing Process Interim Staff Guidance," Revision 1, January 19, 2011 (ADAMS Accession No. ML110140103).
  3. NRC Letter "Diablo Canyon Power Plant, Unit Nos. 1 and 2 - Acceptance Review of License Amendment Request for Digital Process Protection System Replacement (TAC Nos. ME7522 and ME7523)," dated January 13, 2012.
  4. NRC Letter "Summary of June 13, 2012, Teleconference Meeting with Pacific Gas and Electric Company on Digital Replacement of the Process Protection System Portion of the Reactor Trip System and Engineered Safety Features Actuation System at Diablo Canyon Power Plant (TAC Nos. ME7522 and ME7523)," dated June 27, 2012 (ADAMS Accession No. ML12170A866).
  5. Invensys Operations Management Letter, "Invensys Operations Management Letter Submittal to Support License Amendment Request from PG&E for Replacement of the Eagle 21 Process Protection System at Diablo Canyon Power Plant," dated October 26, 2011 (ADAMS Accession No. ML113190392).

Dear Commissioners and Staff:

In Reference 1, Pacific Gas and Electric (PG&E) submitted License Amendment Request (LAR) 11-07 to request NRC approval to replace the Diablo Canyon Power

Attachments 9-11 to the Enclosure contain Proprietary Information  
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Plant (DCPP) Eagle 21 digital process protection system (PPS) with a new digital PPS that is based on the Invensys Operations Management Tricon Programmable Logic Controller, Version 10, and the CS Innovations, LLC (a Westinghouse Electric Company), Advanced Logic System. The LAR format and contents in Reference 1 are consistent with the guidance provided in Enclosure E and Section C.3, respectively, of Digital Instrumentation and Controls (I&C) Revision 1 of Interim Staff Guidance Digital I&C-ISG-06, "Licensing Process" (ISG-06) (Reference 2). In Reference 3, the NRC staff documented its acceptance of Reference 1 for review.

The PG&E Quality Verification group has developed the quality assurance plan document "Quality Assurance Plan for the Diablo Canyon Process Protection System Replacement". This plan is contained in Attachment 1 to the Enclosure and addresses the Open Item Number 27 contained in Enclosure 2 of Reference 4.

PG&E has revised the ISG-06 Phase 1 documents, "DCPP Units 1 & 2 PPS Replacement Functional Requirements Specification (FRS)" and the "DCPP Units 1 & 2 PPS Replacement Interface Requirements Specification (IRS)." The revised "DCPP Units 1 & 2 PPS Replacement FRS, Revision 5," and the "DCPP Units 1 & 2 PPS Replacement IRS, Revision 6," are contained in Attachments 2 and 3 to the Enclosure, respectively. These revised FRS and IRS documents supersede the documents previously submitted in Attachments 7 and 8 to the Enclosure of Reference 1, respectively.

Invensys Operations Management has created document "993754-1-916, V10 Tricon Reference Design Change Analysis," that addresses the impact of changes between Tricon version 10.5.1 and Tricon version 10.5.3. Tricon version 10.5.3 is intended to be installed for the Diablo Canyon PPS replacement. The Invensys Operations Management document "993754-1-916, V10 Tricon Reference Design Change Analysis, Revision 0" is contained in Attachment 4 to the Enclosure.

Invensys Operations Management submitted, in Reference 5, the following Invensys Operations Management ISG-06 Enclosure B Phase 1 Tricon documents to support Reference 1; "993754-1-802, Revision 1, Software Verification and Validation Plan," "993754-1-813, Revision 0, Validation Test Plan," and "993754-1-906, Revision 0, Software Development Plan." These Invensys Operations Management documents have been revised to address NRC comments contained in Enclosure 2 of Reference 4. The non-proprietary versions of the Tricon Software Verification and Validation Plan, Validation Test Plan, and Software Development Plan are contained in Attachments 5, 6, and 7 of the Enclosure, respectively, and the proprietary versions are contained in Attachments 9, 10, and 11 of the Enclosure, respectively. These revised Tricon documents supersede the documents previously submitted in Reference 5.

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This letter contains Invensys Operations Management documents contained in Attachments 9, 10, and 11 to the Enclosure that contain information proprietary to Invensys Operations Management. Accordingly, Attachment 8 to the Enclosure includes Invensys Operations Management Affidavit No. 993754-AFF-38T. The affidavit is signed by Invensys Operations Management, the owner of the information. The affidavit sets forth the basis on which the Invensys Operations Management proprietary information contained in Attachments 9, 10, and 11 to the Enclosure may be withheld from public disclosure by the Commission, and it addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390 of the Commission's regulations. PG&E requests that the Invensys Operations Management proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390. Correspondence with respect to the Invensys Operations Management proprietary information or the Invensys Operations Management affidavit provided in Attachment 8 to the Enclosure should reference Invensys Operations Management Affidavit No. 993754-AFF-38T and be addressed to Roman Shaffer, Project Manager, Invensys Operations Management, 26561 Rancho Parkway South, Lake Forest, CA 92630.

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


This information does not affect the results of the technical evaluation or the significant hazards consideration determination previously transmitted in Reference 1.

This communication does not contain regulatory commitments (as defined by NEI 99-04).

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

Executed on August 2, 2012.

Sincerely,

  
James M. Welsch  
Interim Site Vice President

kjse/4328 SAPN 50271918  
Enclosure  
cc: Diablo Distribution

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