

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**Report on****Fact-Finding Meeting on July 31 and August 1, 2024****by****Per F. Peterson, Member, and R. Ferman Wardell, Consultant****1.0 SUMMARY**

The results of the DCISC July 31 and August 1, 2024, Fact-Finding Meeting for the Diablo Canyon Power Plant (DCPP) are presented. The subjects addressed and summarized in Section 3 are as follows:

1. Observation of the July 31, 2024 NRC-Evaluated Emergency Exercise
2. DCPP Stranded Plant Procedure
3. Annual Radiological Reports
4. Operational Experience Program Update
5. Workplace Seismic Safety
6. Nuclear Liability Insurance
7. Meet with DCPP Officer
8. Meet with NRC Senior Resident Inspector
9. Spent Fuel Movement to ISFSI

2.0 INTRODUCTION

This Fact-Finding Meeting for the DCPP was held to evaluate specific safety matters for the DCISC. The objective of the evaluation was to determine if PG&E's performance is appropriate and whether any areas revealed observations which are important enough to warrant further review, follow-up, or presentation at a public meeting. These safety matters include follow-up and/or continuing review efforts by the Committee, as well as those identified as a result of reviews of various safety-related documents.

Section 4 – Conclusions, highlights the conclusions of the FFT based on items reported in Section 3 - Discussion. These highlights also include the team's suggested follow-up items for the DCISC, such as scheduling future Fact-Finding Meetings on the topic, presentations at future public meetings, and requests for future updates or information from DCPP on specific areas of interest, etc.

Section 5 – Recommendations, presents specific recommendations to PG&E proposed by the FFT. These recommendations will be considered by the DCISC. After review and approval by the DCISC, this Fact-Finding Report, including its recommendations, will be provided to PG&E. The Fact-Finding Report will also appear in the DCISC Annual Report.

3.0 DISCUSSION

3.1 Observation of the DCPN NRC-Evaluated Emergency Exercise

The DCISC Fact-finding Team (FFT), comprised of Member Dr. Per F. Peterson and Consultant R. Ferman Wardell, observed key phases of the July 31, 2024 NRC-evaluated DCPN emergency exercise. DCPN performs one major exercise and several limited exercises annually with NRC and the Federal Emergency Management Agency (FEMA) evaluations occurring every other year. This particular exercise was an Ingestion Pathway Exercise, which would continue beyond this initial stage to evaluate the longer-term effects of radioactivity on the environment and food chain. The last DCISC observation of a DCPN emergency exercise was in September 2022 (Reference 6.1) when it concluded the following:

The DCPN September 14, 2022 Evaluated Emergency Exercise appeared to have been planned and implemented effectively. The scenario was challenging, and emergency personnel handled it properly. Each emergency location activated on time and set up properly. Emergency Action Levels and Protective Action Recommendations were declared correctly.

Subsequently, in March 2023 (Reference 6.2) the DCISC reviewed the critique of the September 14, 2022 emergency exercise and concluded the following:

DCPN's September 14, 2022 emergency exercise critique determined that the exercise was satisfactory overall, meeting all major objectives. The critique was comprehensive and thorough, including many lessons-learned for improved future performance. Three gaps to excellence were identified and corrected.

The purpose of this July 31, 2024 exercise was to develop and maintain the Emergency Response Organization's (ERO's) key skills to protect public health and safety in the unlikely event of a radiological emergency. Because this exercise included FEMA evaluation for ingestion pathways, the scenario involved a simulated release large enough to require declaration of a General Emergency. The Emergency Plan Exercise was designed to evaluate the proficiency of DCPN personnel in implementing the principal Emergency Plan functions in response to a radiological emergency sufficiently severe to exercise ingestion pathways responses. The Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), Unified Dose Assessment Center (UDAC), and Joint Information Center (JIC) participated. The plant simulator acted as the Control Room and drove indications in DCPN's Emergency Response Facilities.

The NRC, Sheriff's Watch Commander, County Emergency Operations Center, and the State of California Office of Emergency Services Warning Center participated along with offsite agencies

within the DCPPE Emergency Planning Zone as described in the County's extent of play agreement with FEMA.

The exercise had as its objective evaluating the following activities:

- Communications between onsite and offsite Emergency Response Facilities
- Coordination with offsite response organizations
- Dissemination of information to the public via media channels
- Operational and engineering assessment of accident sequences
- Engineering assessment, repair plan development, and repair of critical equipment under emergency conditions
- Mitigative action implementation through the simulated repair of equipment
- Protection of workers (radiological or physical) during emergency response

The DCISC FFT began its observation in the simulated Control Room, which was the Reactor Simulator. The exercise scenario is summarized as follows:

- | | |
|----------|--|
| 7:00 am | - Drill Setup |
| 7:40 am | - Initial Conditions (both units at 100% power) |
| 8:02 am | - Reactor Coolant System leak inside Unit 1 (Alert declared) |
| 8:35 am | - Unit 1 reactor trip due to loss of 12kV Bus E |
| 8:50 am | - Train B In-Core Temperature Monitoring System Failure |
| 10:05 am | - Small break loss of coolant accident (LOCA) (Site Area Emergency declared)
- Safety Injection actuation
- Fuel damage
- Loss of two vital buses
- Emergency Diesel Generator trips on overspeed
- Electrical backfeed not available |
| 10:10 am | - Emergency Response Organization responds to Site Area Emergency
- EOF, TSC, OSC and JIC activated |
| 10:15 am | - Early work release/site evacuation
- The DCISC FFT travels to the EOF |
| 11:26 am | - Containment penetration failure (General Emergency declared)
- Radiation release to the environment
- Protective action recommendations (PARs): Evacuate affected Protective Action Zones
- The DCISC FFT travels to the JIC |

- 12:01 pm - PARs upgraded based on radiation dose assessment results
- 1:00 pm
 - Drill terminated
 - Individual facility critiques begun
 - Overall critique begun

The FFT observed activities in the EOF, which was staffed by recovery management personnel from all functional areas of the plant, the San Luis Obispo County (SLO) Emergency Services personnel, various County functional departments, and the Unified Dose Assessment Committee (UDAC) jointly made up of DCPD and County personnel. Although the FFT could not observe the various and final critiques, it appeared that all drill objectives were met.

The FFT also observed activities in the JIC, which consisted of a PG&E Spokesperson, a PG&E Public Information Officer, an SLO County Spokesperson, and the SLO County Certified Public Health Physicist. The spokespersons held periodic mock news conferences with mock media asking questions. There were also numerous written news releases by PG&E (5), SLO County (22), and the City of Pismo Beach (4). The news releases appeared accurate and publicly understandable.

Conclusions: The July 31, 2024 DCPD NRC-Evaluated Emergency Exercise appeared well designed and implemented. The scenario involved a sufficiently large release to require declaration of a General Emergency and to exercise Ingestion Pathways response. All exercise objectives were met. The NRC evaluation was not yet available, and the DCISC will review its evaluation when released. The DCISC should review the DCPD drill critique and NRC evaluation in a future fact-finding meeting when they are completed.

Recommendations: None

3.2 DCPD Stranded Plant Procedure

The DCISC FFT met with Dan McBride, Operations Director, to review the DCPD Stranded Plant Procedure, and updates to include FLEX equipment readiness. (FLEX is not an acronym but describes a strategy developed by the nuclear industry to provide diverse and flexible coping strategies and portable equipment to address the loss of safety-related systems due to beyond design basis events.) A stranded plant means loss of all viable access points to/from DCPD.

The DCISC last reviewed this subject in May 2024 (Reference 6.3), when it concluded the following:

DCPD initiated appropriate follow-up actions in response to a DCISC recommendation concerning post-earthquake procedures. Procedure changes to Operations procedure CP M-4, "Earthquake," were satisfactorily completed. The DCISC should review additional changes planned for procedure CP M-12, "Stranded Plant," during a future Fact-Finding Meeting later in 2024.

Mr. McBride provided a copy of the current Stranded Plant Procedure (Procedure CP M-12, Rev. 9, “Stranded Plant”) to the FFT and then reviewed changes made to the procedure to include the readiness of FLEX equipment in the case the plant is stranded. The changes appeared appropriate.

Conclusions: The DCPD changes to its Stranded Plant Procedure, to include procedure steps for plant personnel to confirm the readiness of FLEX equipment in a stranded plant condition and to transition to use FLEX procedures if warranted, appeared satisfactory.

Recommendations

None.

3.3 Annual Radioactive Effluent Release Report

The FFT met with David Valentine, Chemistry Engineering Supervisor; Matthew Hoey, Chemistry Engineer (Radiological Effluent Releases); Austin Luedtke (Radiological Environmental Monitoring Program); and Craig Sutton, Radiation Protection Manager, to review the 2023 Annual Radiological Effluent Release Report and the 2023 Annual Radiological Environmental Operating Report, which had been submitted to the Nuclear Regulatory Commission (NRC). The DCISC last reviewed these reports in August 2023 (Reference 6.4), when it concluded the following:

The DCPD Radioactive Effluent Release Program and the Radiological Environmental Monitoring Program appeared satisfactory in calculating, monitoring, and measuring radioactivity in the environment. During 2022 there were no abnormal releases of radioactivity nor were there any abnormal levels of radioactivity detected in the environment surrounding DCPD. DCPD site operations had no significant radiological impact on the health and safety of the public or the environment, and radioactive releases were far below regulatory limits.

2023 Annual Radioactive Effluent Release Report (ARERR)

The ARERR described the measured/calculated quantities of radioactive gaseous effluents, liquid effluents, and direct radiation released from the plant in 2023. The descriptions below represent selected, representative excerpts from the report.

The 2023 ARERR summarized gaseous and liquid radiological effluent releases from DCPD Units 1 and 2. The report included the dose to hypothetical representative offsite receptors due to the release of radioactive liquid and gaseous effluents and summarized solid radwaste shipments. The report contained information required by Units 1 and 2 Technical Specification 5.6.3 and was presented in the general format of Regulatory Guide 1.21, “Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water Nuclear Power Plants,” Revision 1, 1974, Appendix B, “Effluent and

Waste Disposal Report.” In all cases, the doses associated with plant effluent releases during the report period were much less than the respective Technical Specification, Offsite Dose Calculation Manual (ODCM), and NRC limits. Results of the monitoring program reflected continued effort to maintain the release of radioactive effluents to the environment as low as reasonably achievable. The results were calculated (based on measured data) in accordance with the ODCM.

Overall, the liquid and gaseous radioactivity releases from DCPD were well-controlled and maintained as low as reasonably achievable. The 2023 results from DCPD were well below all applicable limits for liquid and gaseous releases, and there were no abnormal or uncontrolled releases during 2022. Due to the terrain surrounding the plant, DCPD has no offsite direct radiation receptors with significant occupancy. Therefore, a bounding value for dose from direct radiation has been calculated for a receptor location that is onsite and close to both the sources and the nearest site boundary. Calculated doses from direct radiation have all been well below the 40 CFR 190 limit of 25 mrem/year.

Based on records of 2023 radioactive liquid and gaseous releases, the following off-site radiation doses to the total body of a hypothetical individual at the closest residence on the northwest site boundary full-time and the corresponding percent of ODCM limits for the year 2022 were reported in the ARERR as:

<u>Effluent Type</u>	<u>Calculated Radiation Dose</u>	<u>Percent of ODCM Limit</u>
Liquid	0.000285 millirem	0.0095%
Gaseous	0.000549 millirem	0.000366%

The results of the 2023 ARERR showed that the doses associated with plant effluent releases were much less than the respective DCPD Technical Specification and NRC limits. Overall, the liquid and gaseous radioactivity releases from DCPD were well-controlled and maintained as low as reasonably achievable.

2022 Annual Radiological Environmental Monitoring Program Report (AREMPR)

The AREMPR report described the results of the Radiological Environmental Monitoring Program (REMP), which measures and assesses the levels of radiation or radioactivity in the environment related to operation of DCPD and verifies that DCPD operated within its design parameters. The descriptions below represent selected, representative excerpts from the report.

Approximately 275 solid and liquid environmental samples, 884 air samples, and 1440 Thermo-Luminescent Dosimeter (TLD) radiation detectors were collected over the course of the 2023 REMP monitoring period. Approximately 1800 radionuclide analyses were performed on environmental samples. The types of environmental samples collected for this monitoring period included:

- Air, Particulate
- Air, Iodine-131
- Air, Carbon-14
- Direct Radiation

- Milk
- Meat
- Vegetation
- Drinking Water
- Groundwater
- Monitor Well
- Surface Water
- Aquatic Vegetation
- Fish
- Mussels
- Ocean Sediment

The ambient direct radiation levels in the DCPD offsite environs did not change in 2023 and were within the pre-operational background range. An evaluation of direct radiation measurements indicated that all U.S. Environmental Protection Agency criteria were met by a large margin. The ambient onsite direct radiation levels within the DCPD plant site boundary near the Independent Spent Fuel Storage Installation (ISFSI) were slightly elevated due to dry cask spent fuel storage. The measurements at the remaining onsite REMP environmental TLD locations were not affected by the ISFSI due to ISFSI topographical elevation and placement within an onsite hillside which provided shielding to the rest of the site. An evaluation of direct radiation measurements and member-of-public occupancy times within the site boundary indicated that all Federal criteria for member-of-public dose limits were met by a large margin.

Groundwater isotopic monitoring was conducted in accordance with the Nuclear Energy Institute guidance document NEI 07-07, Revision 1, "Groundwater Protection Initiative." Concentrations of tritium were detected in two shallow monitoring wells (stations DY1 and OW1) near the power block. The levels of tritium detected in groundwater were approximately 4% of federal standards for the allowable maximum concentrations of tritium in drinking water. This tritium was evaluated and attributed to rain-washout of gaseous tritium exiting the plant vent system via an approved and monitored isotopic-effluents discharge path. No groundwater tritium was attributed to DCPD system leaks or spills. It was also noted that studies of the DCPD site groundwater gradient indicated that any subsurface groundwater flow beneath the DCPD power block was not used as a source of drinking water. Due to topography and site characteristics, this groundwater gradient flows naturally into the Pacific Ocean which is approximately 100 yards from the power block.

The Old Steam Generator Storage Facility (OSGSF) long term storage vault was constructed within the DCPD site boundary in 2007 for storage of eight retired DCPD steam generators and two retired DCPD reactor heads. This OSGSF did not cause any changes to the ambient direct radiation levels within the DCPD environs during 2022. The OSGSF in-building sumps were inspected quarterly by REMP personnel and only small amounts of water were found and collected for processing via the site's liquid radwaste system.

The results of the 2023 REMP showed no unusual environmental isotopic findings from DCPD site operations. These results were compared to DCPD preoperational isotopic data and showed no unusual trends. The REMP reported that operation of DCPD continued to have no detectable offsite radiological impact. Samples analyzed from the offsite sampling stations continued to show

that DCPD site operations had no significant impact on the health and safety of the public or the environment. The annual offsite radiological dose received by the general public from plant operations was less than one millirem which is insignificant when compared to the 620 millirem average annual radiation exposure to people in the United States from natural and man-made background radiation sources (cosmic, terrestrial, radon, medical, etc.).

Conclusions: The DCPD Radioactive Effluent Release Program and the Radiological Environmental Monitoring Program appeared satisfactory in calculating, monitoring, and measuring radioactivity in the environment. During 2023 there were no abnormal releases of radioactivity nor were there any abnormal levels of radioactivity detected in the environment surrounding DCPD. DCPD site operations had no significant radiological impact on the health and safety of the public or the environment, and radioactive releases were far below regulatory limits.

3.4 Operating Experience Program Update

The DCISC FFT met with Matt Birkel, Director of Performance Improvement, Alex Brown, Performance Improvement Manager for the Corrective Action Program (CAP) and Operating Experience Program (OEP), and Dustin Yancey, OE Coordinator. The DCISC last reviewed the OEP in November 2021 (Reference 6.5), when it concluded the following:

The DCPD Operating Experience Program was healthy and appeared to be implemented effectively except for a missed opportunity in 2011.

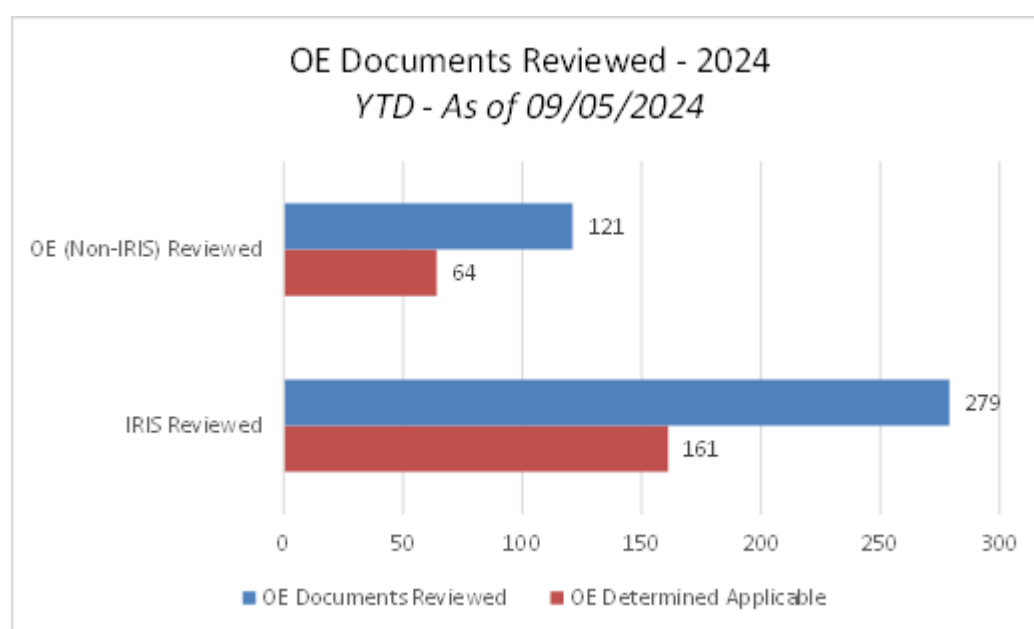
DCPD's Operating Experience (OE) Program is governed by procedure OM4.ID3, "Operating Experience Program," a copy of which was provided to the Fact-finding Team. The program is managed by two persons, the station OE Coordinator and the OE Coordinator's Backup. Industry OE information comes from two primary sources: 1) the Institute of Nuclear Power Operations (INPO) Industry Reporting and Information System (IRIS) (formerly ICES, Industry Consolidated Event System), and 2) other sources, including NRC, industry vendors, international data bases, peer committees, engineering news, etc. From these sources the plant receives 15 to 20 OE event reports per week. These OE Reports are entered into an OE Database for tracking, and the information considered to be relevant to DCPD is transmitted to DCPD department Subject Matter Experts (SMEs typically, from Operations, Maintenance, or Engineering) who review the material for specific applicability to their areas and determine if action is required. Their reviews are formally documented and retained in the OE Database. In addition to receiving industry OE Reports, DCPD also transmits its own OE Reports both to the NRC and to others in the industry via its own entries into the IRIS system. Typically, DCPD reports three to five OE events per month to the industry.

If the OE event is determined to be applicable to DCPD, the SME creates a Corrective Action Program Notification (SAPN) in DCPD's SAP information management system to initiate and track further actions. (SAPN comes from the SAP name brand data base system used by DCPD.) Some higher categories of OE events, such as Level 1 and Level 2 Industry Event Reports from IRIS, bypass the screening process and go automatically into SAP. Once entered into the SAP

system as a Notification, the OE event must be fully reviewed for applicability and any corrective actions for DCPD must be developed and assigned within 60 days. The 60-day standard is closely tracked. Notification closure quality and timeliness are also monitored through the OE Program Health indicator in the monthly Plant Performance Improvement Report. The indicator has remained “Green” (Healthy) for the last year.

Since the beginning of 2024, the OE Coordinator has received and processed 224 OE reports. Of these, 144 were determined to be applicable to DCPD, and were processed as described above. Of the 144 the table below shows the results of applicability required additional analysis or changes to the plant or procedures.

The graphic below has been updated with YTD reference numbers through today (09/05/2024) to provide an updated perspective.



Additionally, in response to the question on DCPD actions:

For the IRIS report population outlined above, 5 of the items reviewed resulted in additional action by DCPD. None were what I think would be considered “significant,” and range from daily brief review / discussion to procedure / program enhancements.

For the Non-IRIS (all other OE) items, 10 of the items reviewed resulted in additional action. One item is currently open and under further evaluation (DA SAPN 51248482, “DA-AST: Potential Unanalyzed Dose Path”) which was initiated in response to a review of an Inspection Report documenting a violation at Waterford station (Refer to OE Evaluation SAPN 51241930).

The remaining items all seem similar to the above IRIS review, actions related to potential program / procedure enhancements.

Conclusions: The DCPD Operating Experience Program was healthy and appeared to be implemented effectively.

Recommendations: None

3.5 Workplace Seismic Safety

The FFT met with Mike Brass, Maintenance Director, for an update on DCPD workplace seismic safety. Workplace seismic safety is directly related to FLEX response to earthquakes (e.g., see 3.2 Stranded Plant Procedure discussion on post-earthquake FLEX response).

The DCISC last reviewed workplace seismic safety in May 2023 (Reference 6.6), when it concluded the following:

Offices, classrooms and shops in DCPD's Maintenance Training Building had the proper anchoring or bottom weighting of tall furniture to assure personnel safety in the event of earthquakes.

In the previous May 2023 DCISC fact-finding meeting the FFT received and reviewed DCPD's "Standards for Bracing Office Furniture, Cabinets, and Storage Racks Revision 2 (1/30/2020)." The policy is intended to protect personnel from injury and ensure egress routes are not blocked by office furniture impact. This document defines when and how to brace office furniture, file cabinets, bookcases, and storage racks. These standards appeared satisfactory. The FFT was informed that this document was unchanged and still in place.

In past fact-finding meetings the DCISC FFT has toured various workspaces checking on furniture, cabinets, and shelves to see how they meet the DCPD standards. Generally, in recent years items were found to have been secured appropriately; however, during this fact-finding review, there was a tall cabinet in the meeting room that was not anchored or bottom weighted. This cabinet was recently added to the room. Mr. Brass stated that he would initiate a Corrective Action Program notification to have the cabinet secured, and he would review training and plant communications to identify corrective actions.

Conclusions: The DCPD standards for bracing furniture, cabinets and storage racks are not being implemented consistently. A tall cabinet in the fact-finding meeting room had been recently installed without proper anchors or bottom weighting. The Maintenance Director has entered this noncompliance into the DCPD Corrective Action Program for resolution. Additionally, the Maintenance Director confirmed that personnel training and plant communications will be reviewed by DCPD to assess the extent of condition for workspace seismic safety and develop corrective actions. DCISC should review this notification and resulting corrective actions.

Concerns: DCPD is not implementing its workplace seismic safety procedures consistently. The DCISC considers workplace seismic safety to be important to plant seismic safety, because it affects the safety and availability of plant personnel to respond to seismic

events and to implement post-earthquake procedures including FLEX responses if needed. DCISC is treating this as a Concern, because DCPD has recognized the problem and will be taking corrective actions.

Recommendations: None

3.6 Nuclear Liability Insurance

The FFT met with Mark Baker, Engineering Programs Supervisor, and Craig Sutton, Radiation Protection Manager, to review DCPD's nuclear liability insurance for radiological coverage. The DCISC last reviewed DCPD insurance in May 2024 (Reference 6.7), when it concluded the following:

Property and equipment insurance policies were being properly maintained by PG&E, and a 2022 inspection by the insurer found no major deficiencies. The DCISC should review results from the next NEIL inspection (fall 2024) and the status of radiological protection insurance during future Fact-Finding Meetings.

There are two major components to nuclear liability insurance:

1. The Federal Price-Anderson Act: the main purpose of the Act is to ensure the availability of a large pool of funds (currently about \$10 billion) to provide prompt and orderly compensation to members of the public who incur damages from a nuclear or radiological incident no matter who is liable.
2. Additionally, power reactor licensees are required to have the maximum level of primary insurance available from private sources (currently about \$300 million) and contribute up to \$98.5 million per unit to a secondary insurance pool.

DCPD's insurance programs were structured in two primary areas:

- Property and Boiler Machinery – Insured by Nuclear Electric Insurance Limited (NEIL) and European Mutual Association for Nuclear Insurance (EMANI)
- Radiological Protection (radiation exposures and releases) – Insured by American Nuclear Insurers (ANI)

The property insurance portion was structured into several tiers above PG&E's deductible threshold. Policies from NEIL and EMANI were combined to cover the first \$1.5 billion and excess losses above that amount were covered by a separate policy from NEIL for another \$1.25 billion. These policies and their values were also required to be regularly reported to the NRC and were last reported in March 2024.

Radiological insurance provided by ANI for DCPD is in the amount shown below in the annual report to NRC.

As required by 10 CFR 50.54(w)(3), listed below is the annual reporting of nuclear property insurance coverage with Nuclear Electric Insurance Limited (NEIL) and European Mutual Association for Nuclear Insurance (EMANI) for Diablo Canyon Power Plant (DCPP).

DCPP NEIL & EMANI/Primary \$1,500,000,000 P24-027 04/01/24 to A14/1006/2024/1 04/01/25
NEIL Blanket Excess \$1,250,000,000 BX24-007 04/01/24 to 04/01/25.

TOTAL \$2,750,000,000

Pacific Gas and Electric Company (PG&E) procures from EMANI an additional \$200,000,000 of Property Damage coverage in excess of the stated NEIL limits for DCPP. This Policy Number is A14/1006/2024/0 for the Policy Period from April 1, 2024, to April 1, 2025.

ANI performs annual inspections of nuclear plant programs for controlling radiological incidents and makes recommendations to reduce the risk of radiological incidents. One recent recommendation was for DCPP to add five additional groundwater wells.

Conclusions: Property and equipment insurance policies were being properly maintained by PG&E, and a 2022 inspection by the insurer found no major deficiencies. Similarly, the DCPP maintained a radiological insurance policy.

3.7 Meet with DCPP Officer

The DCISC FFT met with Adam Peck, Site Vice-President, for a general update. The discussion centered on the agenda items in this fact-finding meeting and other items of mutual interest. The DCISC last met with a DCPP Officer (Site Vice-President Adam Peck) in May 2024 (Reference 6.8) when it concluded the following:

The regular meetings between DCISC and DCPP Officers and Directors continue to be beneficial for both organizations.

Conclusions: The regular meetings between DCISC and DCPP Officers and Directors continue to be beneficial for both organizations.

3.8 Meet with NRC Senior Resident Inspector

The DCISC FFT met with Mahdi Hayes, NRC Senior Resident Inspector for an update. The DCISC meets regularly with the NRC Resident Inspectors and last met with the Senior Resident Inspector during its April 2024 Fact-Finding Meeting (Reference 6.9), when it concluded the following:

The meeting with the NRC Senior Resident Inspector was beneficial, and the DCISC should continue the meetings.

The items discussed in this meeting included the following:

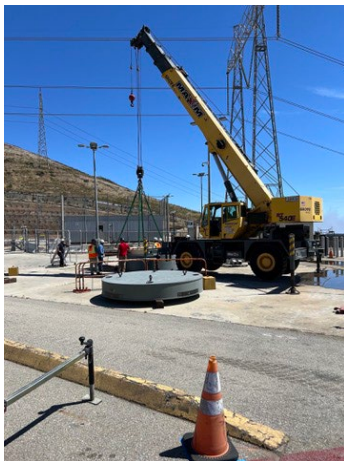
- Recent and near-term future NRC Inspection Activities
- The new DCPD Resident Inspector has been selected but not yet announced.
- Scheduling an NRC Presentation for the DCISC October Public Meeting

Conclusions: The meeting with the NRC Senior Resident Inspector was beneficial, and the DCISC should continue the meetings.

3.8 DCPD Independent Spent Fuel Storage Installation (ISFSI) Current Campaign

The DCISC FFT met with Jearl Strickland, DCPD Consultant, for an update on the current campaign to move spent fuel from the Spent Fuel Pool to the ISFSI. The DCISC last reviewed the ISFSI in June 2024 (Reference 6.10). The group attended an NRC spent fuel movement inspection meeting to learn the results of their inspection of the current campaign. The NRC concluded the campaign performance was satisfactory with no noted problems.

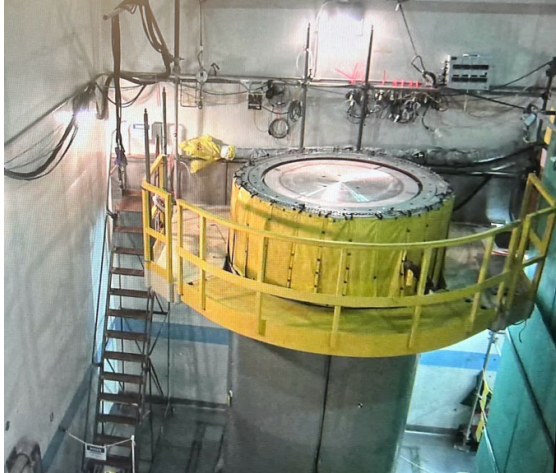
Mr. Strickland took the FFT to the ISFSI to observe campaign activities. The activities included operators using ISFSI cranes and loading devices to complete the insertion of the Multi-purpose Canister into the Outer Cask in the below ground transfer pit. These activities appeared to have been performed correctly and safely.



In-Ground Transfer Facility



New Concrete/Steel Overpacks Awaiting Loading



Multi-purpose Canister Washdown Area



DCISC FFT: Wardell and Peterson
Outside the ISFSI

Conclusions: The current spent fuel transfer campaign from the Spent Fuel Pool to the Independent Spent Fuel Storage Installation appeared satisfactory to the DCISC and to the NRC in its recent inspection.

4.0 CONCLUSIONS

- 4.1** The July 31, 2024 DCPD NRC-Evaluated Emergency Exercise appeared well designed and implemented. The scenario involved a sufficiently large release to require declaration of a General Emergency and to exercise Ingestion Pathways response. All exercise objectives were met. The NRC evaluation was not yet available, and the DCISC will review its evaluation when released. The DCISC should review the DCPD drill critique and NRC evaluation in a future fact-finding meeting when they are completed.
- 4.2** The DCPD changes to its Stranded Plant Procedure, to include procedure steps for plant personnel to confirm the readiness of FLEX equipment in a stranded plant condition and to transition to use FLEX procedures if warranted, appeared satisfactory.
- 4.3** The DCPD Radioactive Effluent Release Program and the Radiological Environmental Monitoring Program appeared satisfactory in calculating, monitoring, and measuring radioactivity in the environment. During 2023 there were no abnormal releases of radioactivity nor were there any abnormal levels of radioactivity detected in the environment surrounding DCPD. DCPD site operations had no significant radiological impact on the health and safety of the public or the environment, and radioactive releases were far below regulatory limits.
- 4.4** The DCPD Operating Experience Program was healthy and appeared to be implemented effectively.

- 4.5 The DCPD standards for bracing furniture, cabinets and storage racks are not being implemented consistently. A tall cabinet in the fact-finding meeting room had been recently installed without proper anchors or bottom weighting. The Maintenance Director has entered this noncompliance into the DCPD Corrective Action Program for resolution. Additionally, the Maintenance Director confirmed that personnel training and plant communications will be reviewed by DCPD to assess the extent of condition for workspace seismic safety and develop corrective actions. DCISC should review this notification and resulting corrective actions.**

Concern: DCPD is not implementing its workplace seismic safety procedures consistently. The DCISC considers workplace seismic safety to be important to plant seismic safety, because it affects the availability of plant personnel to respond to seismic events and to implement post-earthquake FLEX responses if needed. DCISC is treating this as a Concern, because DCPD has recognized the problem and will be taking corrective actions.

- 4.6 Property and equipment insurance policies were being properly maintained by PG&E, and a 2022 inspection by the insurer found no major deficiencies. Similarly, the DCPD maintained a radiological insurance policy.**
- 4.7 The meeting with the NRC Senior Resident Inspector was beneficial, and the DCISC should continue the meetings.**
- 4.8 The current spent fuel transfer campaign from the Spent Fuel Pool to the Independent Spent Fuel Storage Installation appeared satisfactory to the DCISC and to the NRC in its recent inspection.**

5.0 RECOMMENDATIONS

- 5.1 None.**

6.0 REFERENCES

- 6.1 “Diablo Canyon Independent Safety Committee Thirty-Third Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2022 – June 30, 2023,” Approved September 13, 2023, Volume II, Exhibit D.3, Section 3.10, “Observe September 14, 2023 Emergency Exercise.”**
- 6.2 Ibid., Exhibit D.8, Section 3.2, “September 14, 2022 Emergency Exercise Critique.”**
- 6.3 “Diablo Canyon Independent Safety Committee Thirty-Fourth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2023 – June 30, 2024,”**

To Be Approved October 8, 2024, Volume II, Exhibit D.9, Section 3.2, “Response to DCISC Recommendation on the Use of Earthquake Response Procedures”.

- 6.4 Ibid., Exhibit D.2, Section 3.10, “Radioactive Effluent Release and Environmental Monitoring Reports.”
- 6.5 “Diablo Canyon Independent Safety Committee Thirty-Second Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2021 – June 30, 2022,” Approved September 19, 2022, Volume II, Exhibit D.4, Section 3.6, “Operating Experience Program Update.”
- 6.6 “Diablo Canyon Independent Safety Committee Thirty-Third Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2022 – June 30, 2023,” Approved September 13, 2023, Volume II, Exhibit D.10, Section 3.1, “Workplace Seismic Safety Update.”
- 6.7 “Diablo Canyon Independent Safety Committee Thirty-Fourth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2023 – June 30, 2024,” To Be Approved October 8, 2024, Volume II, Exhibit D.9, Section 3.5, “Nuclear Insurance Program.”
- 6.8 Ibid., Exhibit D.9, Section 3.13, “Meet with DCPD Officer.”
- 6.9 Ibid., Section 3.1, “Meet with NRC Senior Resident Inspector.”
- 6.10 Ibid., Exhibit B.9, “Spent Fuel Movement Update.”