

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**Report on****Fact-Finding Meeting at DCP
on December 2, 3, and 11, 2025****by****Raluca Scarlat, Member****with Richard McWhorter and Lisa Darden (Remote), Consultants****1.0 SUMMARY**

The results of the DCISC December 2, 3, and 11, 2025, Fact-Finding Meeting at the Diablo Canyon Power Plant (DCPP) in Avila Beach, CA, are presented. The subjects addressed and summarized in Section 3 are as follows:

1. Emergency Diesel Generator Mission Times and Operability Determination
2. Aging Management Programs
3. Reactor Vessel Embrittlement Sample Capsule B Update
4. Meet with DCP Officers
5. Steam Generator Health
6. Meet with Licensed and Non-Licensed Operators
7. Meet with San Luis Obispo County Department of Emergency Services
8. Auxiliary Saltwater System Discharge Arrangement and FLEX Program
9. Artificial Intelligence Uses at DCP
10. Plant Tour Inside the Radiologically Controlled Area
11. Chemistry Department
12. Meet with Nuclear Regulatory Commission (NRC) Resident Inspectors
13. Public Engagement and Outreach Programs
14. Tour of Outside Equipment Areas
15. Observe Nuclear Safety Oversight Committee Meeting (Remote)

2.0 INTRODUCTION

This Fact-Finding Meeting at the DCP was held to evaluate specific safety matters for the DCISC. The objective of the evaluation was to determine if Pacific Gas and Electric's (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. This Fact-Finding Meeting had the additional goal of onboarding Dr. Scarlat to the Fact-Finding Meeting process, and to facilitate her familiarity with the plant. Therefore, many questions were asked to that end, not

originating from a concern for safety, but with the goal of detailed familiarization with aspects of the plant equipment and plant processes that impact safety. The FFT commends PG&E for the facilitation of this goal and looks forward to continuing productive conversations that contribute to the common goal of ensuring safety at DCPD and communicating the risk and the management of the risk to the relevant members of the public.

Section 4 – Conclusions, highlights the conclusions of the Fact-Finding Team (FFT) based on items reported in Section 3 – Discussion. These highlights also include the FFT’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 DCPD on specific areas of interest, etc.

Section 5 – Recommendations, presents specific recommendations to the DCISC and 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 Emergency Diesel Generator Mission Times and Operability Determination

The DCISC FFT met with Brian Engleton, Shift Operations Manager, for an update on the basis for Emergency Diesel Generator (EDG) mission times and their use in a recent evaluation of EDG system operability. Delphine Hou and Jerry Bischof from the California Department of Water Resources (DWR) also participated remotely in the meeting. (DWR is the state agency charged with overseeing state funds allocated to facilitate the extension of DCPD power operations under Senate Bill 846.) The DCISC last reviewed the health of EDGs during its September 2025 Fact-Finding Meeting (Reference 6.1), when it concluded the following:

The health of DCPD’s Emergency Diesel Generators for both units were rated as Green (Healthy) with no major equipment issues. Equipment challenges with fuel oil day tank level instruments and alarm panel relay modules were being satisfactorily addressed. Two equipment failures that recently occurred during post-maintenance tests were being effectively addressed via the Corrective Action Program, and the DCISC had additional questions regarding the mission time used in an operability evaluation for Emergency Diesel Generator 2-2.

The EDGs are safety-related equipment whose functions are to furnish electric power when offsite power sources are unavailable to mitigate a design basis accident, to enable the reactor to continue to produce power for 72 hours when there is no accident condition, or to furnish power sufficient for an emergency shutdown of the plant. During the DCISC’s September 2025 review of EDG System Health, the DCISC learned that on September 5, 2025, following maintenance activities on EDG 2-2, a jacket cooling water leak occurred from the Jacket Water Pump telltale drain (Notification 51300035). The leak, about 0.3 gallons per hour (gph; 100 drops per minute), was active only during EDG operation and was indicative of minor seal degradation on the pump. The

full level of the tank is 15 inches (30 gallons), the low-level alarm is at 8 inches, and EDG inoperability would occur if water level dropped below 0 inches.

Following the September meetings, the DCISC requested and was provided with several Notifications (SAPNs) providing further information on DCP's evaluation of EDG 2-2 for continued operability with the Jacket Water Pump seal leak. The additional information provided was unclear to the DCISC with regards to the EDG mission times used in the operability evaluations. Specifically, SAPN 51300035 stated that the EDG mission time was 7 days, but SAPN 50838199 stated that the EDG mission time was 24 hours with reference to a 1993 PG&E letter as the basis for the 24-hour mission time. SAPN 50838199 then appeared to use the shorter 24-hour figure as a part of the basis for determining EDG operability but contained other statements regarding a 7-day mission time. Given that much of this previous information was received following the September Fact-Finding meeting, there was not an opportunity for the DCISC to further discuss these documents in detail with PG&E. As a result, the September FFT made the following recommendation to the DCISC:

The DCISC should further review DCP's basis for developing mission times used in an operability determination for a jacket water pump seal leak on Emergency Diesel Generator 2-2. (D9/25FF-3.12)

Following up on the above recommendation, the purpose of this meeting was to review with PG&E the additional information provided as well as any actions taken since the September 2025 review.

Mr. Engleton began by responding to the DCISC's question regarding the correct mission time for the EDGs. He reported that the correct mission time was 7 days and not 24 hours as cited in some evaluations. The seven-day mission time was established by a later evaluation that had not previously been provided to the DCISC, Notification 50979167, a copy of which was provided following the meeting and reviewed by the FFT. The notification specified that the seven-day mission time was based on a very detailed review of licensing basis documents for Emergency Core Cooling Systems and the Electric Power Systems that support their operation following off-normal and accident scenarios. The FFT found that this conclusion appeared to be correct and the seven-day mission time was appropriate.

In response to the FFT's additional questions, Mr. Engleton explained to the FFT the program under which Compensatory Actions and Prudent Actions were managed. Procedure OM7.ID12, "Operability Determination," Revision 46, dated January 15, 2025, established two categories of actions that could be taken to mitigate equipment degradations. The first category, Compensatory Measures, was defined as interim measures implemented to restore, maintain or enhance a function normally required for operability. The second category, Prudent Actions, differed from Compensatory Measures in that they served to increase margins or validate assumptions, rather than to establish or ensure operability. A "Mission Time" of seven days implied operability of the EDG with no operator action over that duration. However, when operator action may be required to ensure mission time, temporary Compensatory Measures may be put in place, allowing for considerations of readiness of the plant to do the work. The shift manager maintains a log of all Compensatory Measures.

The Technical Specifications for DCP's EDGs allows an EDG to be out of service for a defined time period, referred to as "Completion Time." Due to time constraints, the FFT could not ascertain exactly when the EDG was declared inoperable, when the Compensatory Measures were implemented, and if the Completion Time requirement was met. Additionally, the FFT was aware of an open License Amendment Request (LAR) to the NRC to modify the EDG Completion Times using risk-based methodologies. As a case study for Risk-Informed Completion Time, the FFT recommends that the DCISC review how the Completion Time was met for this EDG 2-2 event as well as how a similar event would be handled in the future following approval of the LAR and implementation of a Risk-Informed Completion Time.

Mr. Engleton further explained that under the above Notification, the magnitude of the leak was reviewed and determined to be acceptable for continued operability provided that a Compensatory Measure was established to replenish the Jacket Water Expansion Tank to 15" within two hours following receipt of the low level alarm (annunciator PK16-08) in the Control Room when the EDG was running. With the low-level alarm automatically occurring at 8" (about 16 gallons remaining) and the existing leak rate of 0.3 gph (53 hours of draining time from 8" to 0"), there would be no risk of emptying the expansion tank within the two-hour operator response time even if the leak were to increase significantly (i.e., by a factor of ten). The FFT inquired about industry experience on such leaks increasing, and he stated that industry operating experience records were checked, and it was found that such seal leaks were usually caused by extremely small bits of material caught in the seal and the leaks actually tended to decrease over time as the seal and the trapped material wore down. The FFT also asked how a two-hour response time for operator action would be acceptable for meeting a seven-day mission time, and Mr. Engleton explained that the presence of the existing low-level alarm was significant in making the operator action acceptable for continued operability. In other words, the automatic alarm was being relied upon to initiate the operator actions necessary to ensure continued operability such as was the existing case for many other important EDG functions (such as low oil pressure, high temperature, low or high voltage, etc.). As described in OM7.ID12, the Compensatory Measure (operator action every two hours) was necessary and acceptable for meeting EDG mission time of seven days.

Additionally, the Notification established two Prudent Actions, the first of which required that operators would check expansion tank level every two hours and replenish the coolant if tank level fell below 12 inches (about 24 gallons) when EDG 2-2 was operating. The second required that expansion tank level be checked daily and replenished if needed during normal standby (non-operating) conditions by operators performing their routine inspections.

The FFT found that the above explanation of EDG mission time and the Compensatory Measure put in place for the Jacket Water Pump seal leak resolved the questions contained in the DCISC recommendation cited above (D9/25FF-3.12). Accordingly, the FFT concluded that DCP's Operability Determination was appropriate and recommends that the recommendation be closed. Regarding the status of the Jacket Water Pump seal leak, Mr. Engleton reported that the pump was replaced on October 2, 2025, and the EDG was satisfactorily tested to confirm that the seal leak was no longer present. In summary, the Compensatory Measure was in place for less than a month, the leak occurred only during EDG operation, and the EDG was tested monthly by running for two hours at full load. The Compensatory Measure and Prudent Actions were appropriately determined, carried out, and closed. The FFT requested to see a list of all Compensatory Measures

for the year 2025 and was informed that there were no other Compensatory Measures used in 2025. The FFT also questioned whether continued operation with the leak would affect chemistry of the jacket cooling water, and Mr. Engleton deferred to the Chemistry Group to answer that question (see Section 3.11 below).

Conclusion: DCPD provided additional information regarding evaluations of a seal leak on the Jacket Water Cooling Pump for Emergency Diesel Generator (EDG) 2-2 and the associated Operability Determination which justified the continued operability of the EDG with the leak remaining present. The DCISC found that the Operability Determination was appropriate and that the leak was repaired about one month following its discovery.

Recommendations to the DCISC:

As a case study for Risk-Informed Completion Time, the DCISC should further review how the Technical Specification-required Completion Time was met for an October 2025 Emergency Diesel Generator 2-2 Jacket Water Pump leak event as well as how a similar event would be handled in the future following approval of the License Amendment Request and implementation of a risk-informed Completion Time. (D12/2/25FF-3.1)

The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting and is recommended for closure: *The DCISC should further review DCPD's basis for developing mission times used in an operability determination for a jacket water pump seal leak on Emergency Diesel Generator 2-2 (D9/25FF-3.12).*

Recommendations to PG&E: None

3.2 Aging Management Programs

The DCISC FFT met with Philippe Soenen, Strategic Initiatives Director; Carlos Lopez, License Renewal Supervisor; and Mike Wright, License Renewal Consultant, for an update on DCPD's Aging Management Programs. Delphine Hou and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed Aging Management Programs during its August 2024 Fact-Finding Meeting (Reference 6.2), when it concluded the following:

DCPD's License Renewal Application continued to be processed by the NRC. Aging management inspections completed to date have not revealed any significant issues, and NRC reviews of the aging management inspections have not identified any problems. PG&E satisfactorily provided answers to two DCISC questions related to reactor vessel embrittlement calculation uncertainties and to reactor vessel performance monitoring.

The FFT asked PG&E specifically how the Aging Management Plans (AMPs) applied to instrumentation and cabling at DCPD. Messrs. Soenen and Wright reported that there were 44 total AMPs being implemented at DCPD as contained in and described by the License Renewal Application submitted to the NRC on November 7, 2023 (Reference 6.3). Five of the AMPs

applied directly to instrumentation and electrical cables (excluding transmission system cables) according to the following categories:

<u>Category</u>	<u>Types of Cables</u>
1	Cables located in areas where local environmental conditions could accelerate aging
2	Cables supplying sensitive high-voltage, low-level current signals in the Radiation Monitoring (RM) and Nuclear Instrument (NI) Systems
3	Inaccessible or underground medium-voltage (over 400 volts but less than 25,000 volts) cables
4	Metal-enclosed electrical buses
5	Metallic cable connections

Category 1, cables subject to limiting conditions of temperature, radiation or moisture (excluding cables contained in the existing Equipment Qualification Program) were visually inspected. The initial round of inspections was successfully completed before the start of the Period of Extended Operations and future inspections would be performed at a ten-year interval.

Category 2, high-voltage cables in the RM and NI Systems were electrically tested as needed based on failure records. The initial round of inspections was completed, and several minor issues with cable-to-ground insulation values were found and repaired. Future inspections would be performed with a maximum interval of ten years

Category 3, all inaccessible or underground medium-voltage cables greater than 480 volts were tested using the Tan-Delta (Dissipation Factor) method, which measures energy losses in the insulation. Cables containing 480 volts were tested using megger (high voltage resistance) tests. The initial round of inspections was successfully completed, and future inspections would be performed at a six-year interval.

Category 4, procedures were established for inspections to examine the interior conditions for metal-enclosed buses for a sampling of components. The initial round of inspections was successfully completed, and future inspections would be performed at a five-year interval.

Category 5, one-time tests and inspections for a sampling of components were successfully completed before the start of the Period of Extended Operations.

The FFT inquired regarding how the effects of aging on pressure, level and temperature instrumentation were addressed. Mr. Wright reported that such active instruments were not subject to aging management because their conditions were regularly monitored via the surveillance test (calibration) program. Any aging-related degradation (such as cable deterioration) would be found

during those periodic surveillance tests and a separate AMP for such instruments was not necessary.

The FFT also asked about the overall status of the Aging Management Program at DCP, and Mr. Lopez reported that the station had completed the bulk of its initial round of AMP inspections. Items that remained included the testing of valves that were removed from the plant, and it was expected that all inspections would be completed by March 2026. The station was in the process of transitioning to performing future inspections as an ongoing, recurring part of routine station activities. Regarding staffing to support the Aging Management Program, the large number of staff that managed the License Renewal Application process and the initial round of inspections was gradually being reduced. Future program management was being transferred to the Engineering Department under the direction of a dedicated Aging Management Coordinator who would continue to work within the Station Licensing group. There was a large amount of work ahead for plant staff to begin planning and performing recurring inspections for which many are performed on a five-year periodicity. As of the date of the FFT's meetings, 42 of the 44 AMPs had been transferred to Engineering.

Conclusions: The DCISC found that Aging Management Programs for instrumentation and electrical cables were being appropriately managed by DCP.

Recommendations to the DCISC or PG&E: None.

3.3 Reactor Vessel Embrittlement Sample Capsule B Update

The DCISC FFT met with Philippe Soenen, Strategic Initiatives Director, for an update on the analysis of Unit 1 Reactor Vessel Embrittlement Sample Capsule B which was removed from the vessel on April 21, 2025. Delphine Hou and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed the status of Capsule B during its April 2025 Fact-Finding Meeting (Reference 6.4), when it concluded the following:

DCP appeared to be managing well the schedule and scope of work for Refueling Outage 1R25 [including the removal of Capsule B].

Mr. Soenen provided the following information on the status of testing and analysis for Reactor Vessel Embrittlement Sample Capsule B as of the date of the FFT's meetings:

- The Sample Capsule was successfully shipped offsite to the vendor laboratory in Churchill, PA.
- Disassembly of the capsule in a hot cell had been completed.
- Thermal Wires from the capsule had been analyzed, and it was confirmed that the samples had not been thermally overheated during their time in the vessel.
- Dosimetry counts had been successfully completed and fluence reports prepared.

- Charpy V-notch testing for material samples had been successfully completed, and analysis of the data was in progress. (The Charpy V-notch test is a method used to measure the toughness of materials by determining the amount of energy absorbed during fracture.)
- Directions had been given for reconstitution and testing of weld materials previously removed from Capsule S and returned to the vessel in Capsule B to gather additional data. (Data from material originally contained in Capsule S would not be representative of the limiting weld material at DCPD and would not have an impact on current embrittlement calculations.)
- PG&E expected to receive the draft test report by April 2026 for review. A final update on the results would be submitted to the NRC prior to the due date in the fall of 2026.
- Following receipt of the test report, PG&E would analyze the data to determine if any amendments to information previously submitted in the License Renewal Application would be required.
- After testing was completed, all the sample materials would be indefinitely stored at the laboratory as had been done with all other samples previously removed from DCPD's Reactor Vessels.

Additionally on December 8, 2025, a brief remote meeting was held wherein DCISC consultants Richard McWhorter, Andy Kadak, and Mark Kirk, met with Mr. Lopez along with License Renewal Staff Members Robbie Thomson, and Michelle Olsofsky. The purpose of the meeting was for PG&E to provide additional information regarding Reactor Vessel embrittlement data contained in Table 4.2.2-1 of the License Renewal Application (Reference 6.3) as modified by Amendment 1 (Reference 6.5). The desired information was received by the DCISC and will be included in a separate report being prepared by Dr. Kirk. Dr. Kirk's report will be submitted to the DCISC and made publicly available in the near future.

Conclusion: DCPD reported that the testing and analysis of materials removed from Unit 1 Reactor Vessel Sample Capsule B was in progress, and results were expected to be available as planned in mid-2026.

Recommendations to the DCISC or PG&E: None.

3.4 Meet with DCPD Officers

The DCISC FFT met with Paula Gerfin, Senior Vice President and Chief Nuclear Officer; Adam Peck, Site Vice President; Allen Wilson, Vice President Engineering, Projects and Outages; Blair Jones, Vice President Business and Technical Services; and Lindsay Miller, Chief of Staff and Senior Director. The DCISC last met with a DCPD officer during its September 2025 Fact-Finding Meeting (Reference 6.6), when it concluded the following:

The regular meetings with DCPD Officers and Directors continue to be beneficial for both organizations.

The participants discussed the current meeting agenda items and other items of mutual interest.

Conclusions: The regular meetings with DCPD Officers and Directors continue to be beneficial for both organizations.

Recommendations to PG&E or DCISC: None.

3.5 Steam Generator Health

The DCISC FFT met remotely with Shawn Dunlap, Secondary Systems Strategic Supervisor, and Steve Goschke, Steam Generator (SG) Strategic Engineer, for an update on the health of SGs and future inspection plans. Delphine Hou and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed SG health during its August 2023 Fact-Finding Meeting (Reference 6.7), when it concluded the following:

DCPD's Steam Generators were in excellent health, and plans for future Steam Generator inspections were appropriate. The Engineering Department has hired approximately 48 new staff members over the last year with a mix of entry level engineers and experienced engineers with nuclear experience. This increased staffing level should be sufficient to support the upcoming 1R24 refueling outage.

Historically, DCPD's four SGs per unit were replaced in Refueling Outages 2R14 (Unit 2) in 2008 and 1R15 (Unit 1) in 2009 due to tube degradation. One of the most important SG parameters is the integrity of the 4,444, 0.75-inch diameter, Alloy 690 tubes in each SG. The tubes serve as the pressure boundary between the Reactor Coolant System (RCS) and the Main Steam and Feedwater Systems. To ensure the continued integrity of these tubes, they have been regularly inspected by performing inspections from the primary sides of the SGs using Eddy Current Testing (ECT) inspections. In the past, these inspections were performed every three refueling cycles (every four to five years). Recently, permission had been obtained to extend this inspection interval to 96 Effective Full Power Months (about every eight years) in accordance with NRC regulations and industry guidance for plants based on a history of good inspection results. Mr. Goschke reported that the replacement SGs have been performing very well, and there were currently no issues with performance or maintenance of the eight SGs at DCPD.

At DCPD, 100% of the tubes were last inspected via ECT on Unit 1 during Refueling Outage 1R24 in 2023 and on Unit 2 during Refueling outage 2R21 in 2019. Previous inspections found only minor indications of tube degradation, and only a very small number of tubes have been plugged as follows:

Following 1R24 (2023)

<u>SG Number</u>	<u>Tubes Plugged</u>
1-1	1
1-2	5
1-3	2
1-4	0
Total	8

Following 2R21 (2019)

<u>SG Number</u>	<u>Tubes Plugged</u>
2-1	0
2-2	0
2-3	0
2-4	3 (tubes plugged during original manufacturing)
Total	3

In addition to ECT inspections on the primary (RCS) side of the SG tubes, the secondary (Main Steam) side of the SG tubes is typically visually inspected and cleaned using a process called “sludge lancing.” Sludge lancing was last performed on Unit 1 during Refueling Outage 1R24 and Unit 2 during Refueling Outage 2R21. Additionally, during these cleanings, a Foreign Objects Search and Retrieval (FOSAR) activity is performed to identify and remove any foreign objects that may have entered the secondary side of the SGs from the Feedwater System. If any foreign objects are found and cannot be removed, an analysis is carried out to ensure that there is little or no potential for the objects to cause tube fretting. During past sludge lancements, the SGs were generally found to be clean with little sludge material and few foreign objects removed. Any foreign objects that could not be retrieved were reviewed and found to be acceptable to remain in the SG during future operations. Lastly, inspections of the steam drum areas of the SGs are typically performed every eight refueling outages.

Mr. Goschke reported that since the time of the DCISC’s last review, Unit 1 completed a full round of primary and secondary side inspections during Refueling Outage 1R24 in 2023. On the primary side, there were no major new indications of tube degradation and no additional tubes were plugged. Growth rates in areas of known degradation were low enough to allow future inspections to continue to be conducted on the previously approved/extended interval of 96 Effective Full Power Months (EFPM) of operations (approximately five refueling cycles or eight years). On the secondary side, the amounts of sludge removed continued to be low and there were no major new deficiencies that would require decreasing the interval for future SG secondary-side inspections and cleanings. The current plan for future primary and secondary inspections called for them to be concurrently conducted on Unit 1 during Refueling Outage 1R29 in 2031 and on Unit 2 during Refueling Outage 2R27 in 2028. The FFT requested and reviewed a copy of the most recent Unit 1 SG Degradation Assessment report, dated April 10, 2025. The FFT found that the detailed conclusions of the report aligned with Mr. Goschke’s overview of the health of SGs on Unit 1. Questions about chemical analysis of the sludge and conclusions about corrosion monitoring were deferred to the Chemistry Department (Section 3.11 below).

The FFT was provided with and reviewed the document, “Steam Generator Degradation Assessment,” Revision 0, dated October 1, 2025, for the Unit 2 SGs. There FFT learned that there were no deviations from Electric Power Research Institute (EPRI) guidelines during the inspections. The SG inspection window was set at 96 Effective Full Power Months (EFPM), and the next Unit 2 SG inspections were planned for Refueling Outage 2R27 in the fall of 2028. The degradation assessment reviewed the validity of the 96 EFPM inspection window (based on tube integrity criteria) to ensure that the SG will continue to meet structural and leakage criteria. Tube Support Plate (TSP) wear is an existing degradation mechanism that was evaluated and potential degradation mechanisms that were also evaluated included Antivibration Bar (AVB) wear and loose part wear. Steam pressure was checked to verify if the 3dNDP (three times the normal pressure drop between the primary and secondary sides) values used for pressure testing at the last inspection remains valid. Operational experience from other plants with the similar SG models was reviewed for tube wear, foreign object wear, foreign material, and pressure testing tube failure. For TSP and ABV, worst case deterministic projections of tube wear at 8 Effective Full Power Years (EFPY) were made based on current wear observations, and the results meet the tube wear structural limit. (Details of the error analysis for these calculations were not provided in the documents reviewed.) For completeness, future FFT should review the error analysis for this calculation; the FFT notes that the measured depth of flaw is reported to one significant figure (19%), and the projected depth is reported to three significant figures (44.1%); there is likely good reason for this, but the FFT did not have the occasion to review these uncertainty calculations. Overall, the Degradation Assessment concluded that no changes were needed to the 8-EFPY inspection interval. The FFT commends the SG engineers for preparing a well-documented evaluation and demonstrating a strong understanding of the assessment during the FF meeting.

The FFT inquired regarding whether any future chemical cleanings of the secondary side of the SGs were planned, and Mr. Goschke reported that thermal performance was currently acceptable as demonstrated by the steady and nominal pressure output of the SGs. It was projected that the Unit 1 SGs would likely be cleaned during Refueling Outage 1R29 in 2031 and Unit 2 during Refueling Outage 2R32 in about 2035 (should DCP operations be extended beyond 2030). The FFT concluded that DCP’s Steam Generators were in excellent health, and plans for future Steam Generator inspections were appropriate.

The FFT was provided with a copy of the SG Program Health Metric which indicated green status for program and equipment performance, red status for program personnel, and yellow for program implementation. The use of the Program Health Metrics in planning continuous program improvement is commended, and a review and discussion of the SG Program Health Metrics should continue as good practice during any future Fact-Finding meetings that cover the SG System.

Conclusion: DCP’s Steam Generators were in excellent health, and plans for future Steam Generator inspections were appropriate.

Recommendation to the DCISC: The DCISC should review the error analysis for calculations contained in the October 2025 Degradation Assessment for the Unit 2 Steam Generators. (D12/2/25FF-3.5)

Recommendations to PG&E: None.

3.6 Meet with Licensed and Non-Licensed Operators

The DCISC FFT met with Dan McBride, Operations Services Director; Chris Newport, Operations Planning Manager; Chip Dean, Senior Reactor Operator; Derrick Klenm, Nuclear Operator; and Jessica Schroeder, Nuclear Operator, for an informal discussion about the roles and responsibilities of licensed and non-licensed operators at the station. The DCISC last met with individual operators when it accompanied a Nuclear Operator on rounds during its November 2023 Fact-Finding Meeting (Reference 6.8), when it concluded the following:

On its plant tour the DCISC Fact-finding Team observed the Turbine Building areas to have been clean and orderly with all equipment operating normally. The DCPD Operator escorting the Team was knowledgeable about the various areas of the plant as well as the equipment.

The FFT discussed the following items with the PG&E operators:

- Training Program for Nuclear Operators and Licensed Operators
- Shift Rotation and Turnovers
- Nuclear Operator Round Execution,
- Operator Recruiting and Staffing
- Reporting Concerns Through the Corrective Action Program
- Use of Artificial Intelligence (AI)
- Positive and Negative Aspects of Operator Work

Regarding the use of AI by operators, the operators were not aware of opportunities to use AI tools in their work but were aware of resources being developed at the site that might become useful to them in the future. Overall, the FFT found the discussions open and informative, and they served to provide a good insight to the FFT about the roles and daily routine of operators at DCPD. The atmosphere was one of pride in and enjoyment of one's work and satisfaction with career prospects; the operator job is competitive, the career path is desirable, and the application pool for these positions is seen as strong. Future operator and crafts observation opportunities for the FFT will be sought. (This activity is tracked on the DCISC's Open Items List under item number O-1.)

Conclusion: An informal meeting with several licensed and non-licensed operators provided good insights into the roles and daily routine, recruiting, career prospects, and training programs of operators at DCPD.

Recommendations to the DCISC or PG&E: None.

3.7 Meeting with San Luis Obispo County Department of Emergency Services

The DCISC Fact-Finding Team met with Kelly Van Buren, Emergency Services and Nuclear Power Plant Program Manager, and Anita Konopa, Emergency Services Coordinator, of the San Luis Obispo County Department of Emergency Services, in San Luis Obispo, CA, to discuss the roles of their department and the DCISC in responding to DCPD emergencies. The DCISC last met with the Department of Emergency Services during its April 2025 Fact-Finding Meeting (Reference 6.9), when it concluded the following:

The DCISC Fact-finding Team's visit with the San Luis Obispo County Department of Emergency Services Nuclear Program Manager was beneficial to learn about the status of the county's emergency preparedness programs and to discuss the role of the DCISC.

Mses. Van Buren and Konopa provided the team with a brief description of their backgrounds and the current responsibilities of their office related to the operation of Diablo Canyon Power Plant during an emergency. The participants discussed the following items regarding Emergency Preparedness programs:

- Relationship of the county with DCPD (good)
- Roles and relationships of county and state entities
- Involvement with area schools and Native American Tribes
- Public engagement. Notably, the emergency planning communications to local residents are done through the website as well as the yearly Emergency Planning Calendar that engages the community in a photo contest and makes the calendar a desirable item that members of the community look forward to receiving.
- SLO Emergency Services Nuclear Incidents informational website (<https://www.prepareslo.org/en/nuclear-incidents.aspx>)
- DCISC's role and policy for Emergency Response
- Relationship of the DCISC to state entities when responding to emergencies

Conclusions: The DCISC Fact-finding Team's visit with the San Luis Obispo County Department of Emergency Services Nuclear staff was beneficial to learn about the status of the county's emergency preparedness programs and to discuss the role of the DCISC.

Recommendation for the DCISC: The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting and remains open: *The DCISC should continue its effort to develop a committee policy for responding to an emergency declaration at DCPD (D3/25FF-3.12).*

Recommendations for PG&E: None.

3.8 Auxiliary Saltwater Discharge Arrangement and FLEX* Program

* FLEX is not an acronym but describes a strategy developed by the nuclear industry to provide diverse and flexible coping strategies to address the loss of safety-related systems due to certain beyond design basis events. It is a group of supplemental components, many of them portable, which are seismically stored, and can be made available for timely attachment to permanent plant systems for accident mitigation.

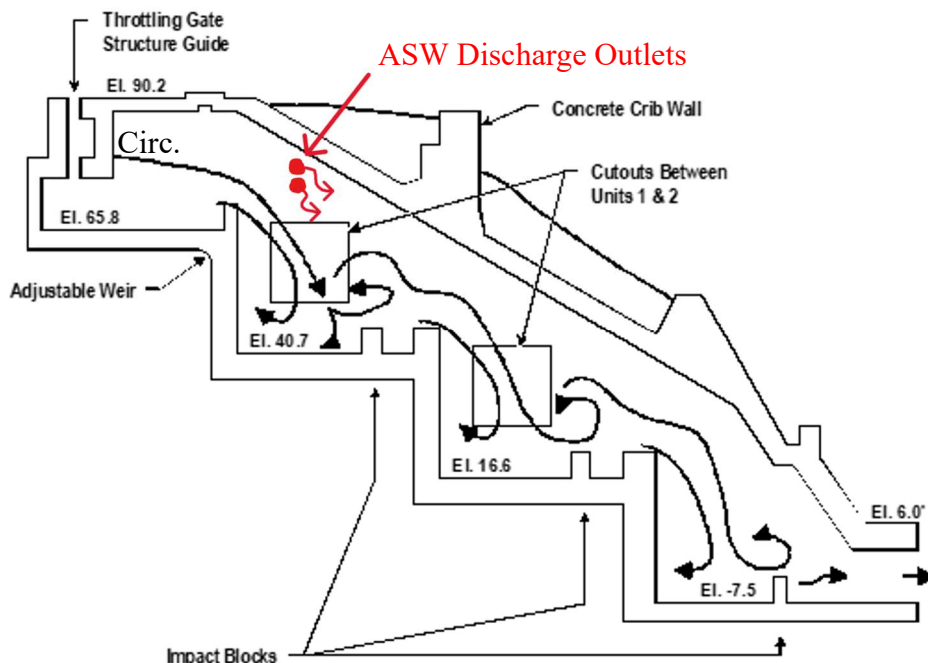
The DCISC FFT met with Michael Jackson, Engineering Services Director; Dallas Adams, Program Engineering Manager; and Bill Conklin, FLEX Program Manager, for an update on the status of PG&E's reviews of a DCISC recommendation to PG&E to review the arrangement of the Auxiliary Saltwater (ASW) System discharge to the Pacific Ocean and its inclusion or exclusion in the FLEX Program. Delphine Hou and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed this topic during its April 2025 Fact-Finding Meeting (Reference 6.10), when it concluded the following:

The DCISC found that a possible collapse of the DCPD Discharge Structure onto the Auxiliary Saltwater discharge outlets was highly unlikely but possible. This scenario should be further reviewed to determine if it should be included as a part of the FLEX Program. A tour of the Discharge Structure found it to be in sound condition with small amounts visible degradation from its exposure to the weather and saltwater.

Additionally in April 2025, the DCISC made the following recommendation to PG&E:

PG&E should review if DCPD should have considered developing FLEX guidelines for providing an alternative discharge path for the Auxiliary Saltwater (ASW) System following a Beyond Design Basis event that may cause a collapse of the Discharge Structure or otherwise obstruct the ASW System discharge (P4/25FF-3.6). PG&E has accepted this recommendation and is working to address it under Notification 51283374.

During the DCISC's April meeting, the FFT explained to the PG&E staff the results of its January reviews and the possible scenario where a collapse of the Discharge Structure could block the ASW System discharge outlets. The FFT identified that the safety-related ASW System included two discharge headers per unit (four total) that discharged into the north and south sides of the non-safety related Circulating Water flow path inside the Discharge Structure. From two drawings provided by PG&E (59455 and 438093), the FFT concluded that the location where the ASW System discharge outlets entered the Discharge Structure was approximately as shown in red on the following sketch:



Cross-Section of the DCPD Circulating Water Discharge Structure Showing the Approximate Locations of the ASW System Discharge Outlets in the Sides of the Structure (red dots; added by the FFT)

Also during the DCISC's April meeting, DCPD confirmed that the FFT's understanding of the configuration of the Discharge Structure and the location of the ASW System discharge outlets was correct. The DCISC explained that it believed that a collapse of the Discharge Structure in such a manner as to completely block flow was extremely unlikely, but it was possible. DCPD agreed that there were no existing FLEX guidelines for this scenario and that further research would be required to understand if and how this scenario may have been addressed in the past analyses that formed the basis for the current FLEX Program.

During this meeting, DCPD provided an update on the results of their research into the question of whether development of a FLEX guideline for providing an alternative discharge path for the ASW System was warranted. Mr. Conklin reported that the question was reviewed under Notification 51283374, a copy of which was provided to and reviewed by the FFT. The ASW Pumps provide 3000 gpm each at 442 ft discharge pressure, with one pump per unit required to meet the design basis heat removal. Overall, DCPD concluded that the situation was covered by existing FLEX guidelines, and no new guidelines needed to be developed to address the postulated situation. This was based on the following information:

- Based on drawings and information provided in the Updated Final Safety Analysis Report, the amount of debris that would be generated by a failure of the discharge structure is unlikely to fully block ASW flow. Notably, during shutdown conditions, only a small portion of normal flow is required for cooling during shutdown conditions. Additionally, less than 7% of each of the openings is needed to meet full flow requirements.

- Were the outfall to be completely blocked, FLEX Guideline FSG 44, “Site Debris Removal,” would be used to deploy available heavy equipment which is capable of removing sufficient debris to establish minimum ASW flow. [Note: Both FSG 44 and FSG 05 (discussed below) were previously reviewed by the DCISC as a part of its review of the use of FLEX Guidelines following an earthquake (Reference 6.11 and 6.12).]
- If the outfall damage was so egregious that it became unavailable, hoses could be routed to the ocean, or alternatively other openings along the ASW discharge line could be created. One such strategy was proposed – the flexible joints immediately downstream of the Component Cooling Water Heat Exchangers could be cut to allow discharge through the Turbine Basement to the ocean. Such actions would be guided by FSG 05, “Initial Assessment and FLEX Equipment Staging.”

The FFT further discussed whether the scenario of cutting the flexible joints and flooding the turbine basement needs to be documented as a guideline that operators can access, in a severe accident scenario, thus benefitting from the discussions that were had during this FF meeting. PG&E explained that FLEX training of personnel expects them to be capable of identifying such a strategy, should this highly unlikely scenario occur, and thus training for preparation of such a scenario is already provided. Thus, the scope of the DCISC remains only to verify that there are credible actions that can be taken by plant staff.

The FFT assessment was that debris removal were feasible. The FFT visited the back side of the outfall and discussed routes of access for the front loader equipment that would be driven in to remove the debris. The elevation of the discharge of the lowest discharge conduit is 18 ft below the elevation of the access road, and front loaders would advance to this point, from either side of the outfall. This approach seemed feasible, and publicly available images of the outfall seem to indicate that a front loader could reasonably advance to the point of discharge.

The possible cutting of the flexible coupling was further discussed. The flexible couplings were located in the basement of the Turbine Building (85' elevation). Elevation of the entry door, per Appendix 3 of Notification 51283374, is 90 ft 3 in. Thus, in this scenario, all basement equipment between 85 ft and 90 ft 3 in elevation would be flooded and considered compromised. PG&E confirmed that none of the flooded equipment would be required in Phase 3 of a severe accident. All of the building doors between the room in which the flexible joints are located and the turbine building outside doors would be propped open. The FFT toured the path of water discharge described above and confirmed feasibility. Assuming a 3 x 6 door, this corresponds to 18 sq. ft. opening, which is ample flow area, given that total area at discharge point is 12.5 sq. ft. for 6000gpm. The FFT observes that the flooding of the turbine building basement will prevent personnel access from any further actions in the Turbine Building; for example, if one of the interior doors that is propped open to allow for 3000 gpm of water to flow out of each unit were to lose its mechanism that keeps it propped open, it is difficult to envision how personnel would access the flooded building to open this door. In this scenario, a new strategy for ASW discharge would need to be considered. We commend PGE for thoughtful and creative approaches to verifying that the plant has coping capabilities for this highly unlikely but possible severe accident

scenario; however, the DCISC should review the FSGs for how doors can be propped open, should this action be needed in a severe accident scenario. The propping open of doors, as demonstrated in this particular scenario, can be a useful tool in responding to an unforeseen scenario, and the plant would be well positioned to have tools and training for how operators can effectively achieve the propping open of doors.

Mr. Conklin also noted that dealing with a loss of ASW was not considered a time sensitive issue during Beyond Design Basis situations and that the general criteria for FLEX Program design allowed greater than 72 hours for responding to a loss of ASW. The FFT inquired regarding why there were FLEX guidelines for dealing with a loss of an ASW supply but not with a loss of the discharge. Mr. Conklin explained that dealing with a loss of an ASW supply inlet structure or pump required the use of specialized equipment (diesel driven pumps, hoses, portable suction screens, etc.) that was specifically purchased and staged for that purpose. In that case, the FLEX guidelines were oriented to guide operators in operating the specialized equipment. Also, the supply differed from the discharge in that active pumping was required to supply ASW flow to the plant whereas discharge flow would return to the ocean via gravity and elevation change. The FFT found that the question had been adequately addressed by DCPD and accepted DCPD's conclusion that no additional guidelines were required.

Conclusions: DCPD adequately reviewed the DCISC's recommendation regarding whether additional FLEX guidelines should be developed for a possible blockage of the Auxiliary Saltwater System discharge from a collapse of the Discharge Structure. It was found that no additional FLEX guidelines were needed, and the DCISC accepted this conclusion.

Recommendation for the DCISC: The DCISC should review FLEX Support Guidelines for how doors can be propped open, should this action be needed in a severe accident scenario. The propping open of doors can be a useful tool in responding to an unforeseen scenario, and the plant would be well positioned to have tools and training for how operators can effectively achieve the propping open of doors. (D12/2/25FF-3.8)

Recommendations for PG&E: The following previous recommendation to PG&E was reviewed in this Fact-Finding Meeting and is recommended for closure: *PG&E should review if DCPD should have considered developing FLEX guidelines for providing an alternative discharge path for the Auxiliary Saltwater (ASW) System following a Beyond Design Basis event that may cause a collapse of the Discharge Structure or otherwise obstruct the ASW System discharge (P4/25FF-3.6).*

3.9 Artificial Intelligence Uses at DCPD

The DCISC FFT met with Jordan Tyman, Risk and Compliance Director, and Erin Bowe, Innovations Supervisor, for an update on DCPD's current and future uses of Artificial Intelligence (AI). Delphine Hou and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed this topic during its March 19, 2025, Fact-Finding Meeting (Reference 6.13), when it concluded the following:

DCPP's initiative to implement the use of an Artificial Intelligence platform named Neutron Enterprise for document and data search, retrieval, and reporting continued to be positive. There were no safety concerns associated with DCPP's current plans for the possible use of Artificial Intelligence at the station.

The FFT began the discussion expressing concerns regarding how the use of AI could have a negative impact on safety if not properly managed. Specific concerns expressed by the FFT were about how new possible failure modes were identified and evaluated as well as the risks inherent with accelerated timeframes of workflow with implementation of AI tools. Mr. Tyman responded with several points of explanation regarding how PG&E was approaching the use of AI at DCPP. He reported that although the use of AI in the world was expanding at a rapid rate, DCPP was moving very slowly and methodically. DCPP's current use of an AI-enhanced search tool (Neutron) was anchored in a model trained on a limited database of NRC and station information. Also, the search tool did not replace any humans in the decision-making process but rather served to better and more efficiently provide information for their decisions. The FFT emphasized that it was important for all AI users to continue to be knowledgeable in knowing what the information that they are seeking and able to recognize possible errors in the information provided by AI. PG&E agreed that it was important to keep the human in the role of decision-maker and independent verifier of information produced from Neutron. Currently, DCPP has no plans to use AI to automate decision-making.

Ms. Bowe then provided a demonstration of the use of the AI search tool (Neutron) to the FFT. She showed how searches were prompted, how results were displayed, and how feedback was given by users to the AI model. Also, she reported that the vendor, Atomic Canyon, was still involved onsite in monitoring the use of the search tool and helping to further train the model. The vendor was also assisting users at the station to grow in their knowledge of how to best prompt the model via appropriate wording of questions, and to learn from the users in which way the tool failed to or succeeded to meet its function. The FFT inquired about which departments found the tool to be most useful, and Ms. Bowe reported that the Work Planners found it very beneficial in helping them locate the myriad of technical documents that were necessary for inclusion into the station's maintenance work packages. It is to be recognized that both the AI system is learning, and the users are also learning what to define as important expectations for the functioning of the AI system. Continued feedback to the AI tool developers and to the internal innovations team directly by the workers and managers who utilize the tool and whose work is impacted by the tool is essential, and we commend PG&E for taking this approach to deployment of the AI tool at DCPP.

The FFT concluded that there continued to be no significant safety concerns with DCPP's current use of AI at the station but encouraged PG&E to fully consider the possibility of new types of failure modes (technical and organizational) that could be generated by the implementation of AI systems at DCPP.

There are safety benefits from application of AI in plant workflows, and positive safety outcomes can be achieved by acceleration of the deployment timeline of such tools. The plant is part of several industry groups for learning from the nuclear industry experience about the application of

AI tools; we commend the plant for the initiative to employ these tools at the plant, for their prudent deployment, and for engagement with the available relevant industry groups.

Conclusions: DCP's initiative to implement the use of an Artificial Intelligence platform named Neutron for document and data search, retrieval, and reporting continued to be positive. There were no significant safety concerns associated with DCP's current plans for the possible use of Artificial Intelligence at the station.

Recommendation to the DCISC: The following previous recommendation to the DCISC was reviewed in this report and remains open: *Because the application of Artificial Intelligence tools has significant potential to change and to improve DCP's operational safety, the DCISC should review this topic frequently (D12/24FF-3.4).*

Recommendations to PG&E: None

3.10 Plant Tour Inside the Radiologically Controlled Area

The DCISC FFT met with Dan McBride, Operations Services Director, and Michael Jackson, Engineering Services Director, for a tour of plant areas containing major components important to safety inside of the Radiologically Controlled Area (RCA). The DCISC last toured an area inside the plant during its September 2025 Fact-Finding Meeting (Reference 6.14), when it concluded the following:

A tour of two Unit 2 Emergency Diesel Generator Rooms found them to be clean and orderly with equipment in good condition.

At the request of the FFT, Mr. McBride and Mr. Jackson guided the team in touring several areas of the Unit 1 Auxiliary and Fuel Buildings inside the RCA with a specific focus on areas containing Emergency Core Cooling System pumps and associated equipment important to safety. The FFT began its entry into the RCA at the control point where technicians coordinated the issuing of dosimeters and the planning of the areas to be toured to avoid unnecessary approaches to areas containing high dose rates. Areas toured included:

- Radiation Protection Offices and RCA Entry (85' Elevation)
- Unit 1 Residual Heat Removal Pumps (73' Elevation)
- Unit 1 Charging (High Head Safety Injection) Pumps (73' Elevation)
- Unit 1 Containment Spray Pumps (73' Elevation)
- Unit 1 Safety Injection Pumps (85' Elevation)
- Unit 1 Auxiliary Feedwater Pumps (100' Elevation)
- Units 1 and 2 Spent Fuel Pools, including New Fuel Storage and Cask Loading Areas (140' Elevation)
- Units 1 and 2 Refueling Water Storage Tanks, Condensate Storage Tanks, and Primary Water Storage Tanks (85' Elevation Outside)

The FFT observed that leak points, even of small leak rates, were labeled and a leak capture system was in place. Overall, the FFT found that the areas toured were clean, orderly, and well lit, with observed equipment in good condition.

Conclusion: The DCISC toured areas containing Emergency Core Cooling System equipment and the Spent Fuel Pools inside the Radiologically Controlled Area. The areas toured were clean, orderly, and well lit, with observed equipment in good condition.

Recommendations to the DCISC or PG&E: None.

3.11 Chemistry Program

The DCISC FFT met with Dave Cortina, Chemistry Manager, for an update on the DCP's Chemistry Program and Department. The DCISC last reviewed this topic during its May 2025 Fact-Finding Meeting (Reference 6.15), when it concluded the following:

DCP's Chemistry Program was performing well with no major issues.

The FFT met with the Chemistry Department to follow up on questions asked during discussions on Steam Generator (SG) health (Section 3.5 above). Mr. Cortina provided an overview of DCP's Chemistry Program which maintains proper water chemistry in the plant's primary and secondary systems to minimize corrosion and biofouling and to manage reactor reactivity in the reactor core. The Chemistry Department is responsible for determining which chemicals, and in what amounts, and processes (e.g., filtration, ion exchange resin, polishing, evaporation, etc.) to use to maintain desired chemistry levels for primary, secondary, and closed cooling systems, as well as to monitor and process station gaseous and liquid wastes.

Regarding the results of SG inspections during Refueling Outage 1R24, Mr. Cortina reported that there were no significant findings and only a small amount of sludge removed from the Unit 1 SGs. He explained that DCP maintained SG chemistry according to guidelines from the Electric Power Research Institute (EPRI) and the Institute for Nuclear Power Operations (INPO) with program effectiveness being monitored by use of the Chemistry Effectiveness Index (CEI). (The CEI combines multiple measurements of chemistry parameters into an 18-month rolling composite that is reflective of the time spent operating outside of industry defined targets for a representative set of primary and secondary chemistry parameters.) SG chemistry parameters are monitored via both periodic and continuous sampling, and the CEI was currently at zero (good performance) on both units. The SG Program Health Metric indicates green status for program and equipment performance, and red status for program personnel, and for the SG management committee.

The FFT asked if the department was involved with the monitoring of the Emergency Diesel Generator 2-2 Jacket Water Pump seal leak (Section 3.1 above), and Mr. Cortina reported that the department was aware of the leak and worked with the Operations Department to ensure that the proper concentration of corrosion-inhibiting chemicals would be maintained were any water added to the system. The department was also responsible for capturing and any lost coolant to ensure

that none of the chemicals were released to the environment. Mr. Cortina reported that the EDG coolant was sampled quarterly to monitor chemical concentrations.

The FFT and Mr. Cortina discussed staffing within the Chemistry Department, and he reported that current staffing levels were adequate. He noted that upcoming changes to the plant's National Pollution Discharge Elimination System (NPDES) permit, which provides limits and sampling requirements for liquid discharges, would increase the amount of work for the department and that more resources could be needed in the future. The FFT also observed that an internal effluent monitoring program was in place. The current National Pollution Discharge Elimination System (NPDES) permit has expired and the most recent application for renewal was submitted by PG&E and deemed complete on October 20, 2025. The proposed new NPDES permit was opened for public comment through December 8, 2025, and the permit adoption hearing is scheduled for February 26 and 27, 2026. The FFT believed that the DCISC should follow up on the implementation, staffing and necessary training plans for complying with the new NPDES and Clean Water Act 401 Water Quality Certification, and the overall strategic plan for the Chemistry Department and its interface with Operations and License Renewal.

The FFT received a copy of the Secondary Water Strategic Chemistry Plan issued in 2024, and the Unit 2 Steam Generator Degradation Assessment (which includes sludge chemistry evaluation, assessment of secondary chemistry trends, and corrosion product transport predictions and observation). The FFT concluded that DCP's Chemistry Program was performing well in maintaining the chemistry of primary and secondary systems such that corrosion would be minimized in plant piping systems and the Steam Generators.

Conclusions: DCP's Chemistry Program was performing well with no major issues.

Recommendation to the DCISC: The DCISC should follow up on the implementation, staffing and necessary training plans for complying with the new National Pollution Discharge Elimination System and Clean Water Act 401 Water Quality Certification, and the overall strategic plan for the Chemistry Department and its interface with Operations and License Renewal. (D12/2/25-3.11)

Recommendations to PG&E: None.

3.12 Meeting with NRC Resident Inspectors

The DCISC FFT met with Madhi Hayes, NRC Senior Resident Inspector, and Eli Garcia, NRC Resident Inspector, for an update. The DCISC last met with the NRC Resident Inspectors during its August 2025 Fact-Finding Meeting (Reference 6.16), when it concluded the following:

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

The participants discussed the following items:

- NRC Reorganization and Future Changes to the Reactor Inspection Program
- DCCP's Safety Culture and Corrective Action Program
- Recent NRC Inspection Findings and Concerns

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

Recommendations to the DCISC or PG&E: None.

3.13 Public Engagement and Outreach Programs

The DCISC FFT met with Tom Jones, Regulatory, Environmental, and Repurposing Senior Director, and Carina Corral, Strategic Initiatives Manager and DCISC Liaison, for an update on the scope and status of DCCP's programs for public engagement and outreach. Delphine Hou and Jerry Bischof from DWR also participated remotely in the meeting. This was the first DCISC review of this topic in recent years.

Mr. Jones reported to the FFT that PG&E uses a multi-pronged approach for outreach to the general public including:

- Meeting with the public and providing information in various group settings (clubs, schools, fairs, etc.)
- Using four avenues of social media to inform the public about DCCP
- Providing plant tours to various groups and individuals with approximately 1000 people per year participating
- Providing a "speaker program" providing PG&E employees to speak at local events
- Interacting directly with local media
- Interacting directly with groups that both support and oppose the use of nuclear power

The FFT and Mr. Jones then discussed various aspects of how the Emergency Preparedness (EP) program includes outreach to and interaction with the public. Mr. Jones explained that the bulk of PG&E outreach for EP centered around the time of the annual siren tests every fall. He also noted that PG&E was working with the county to facilitate a future transition to the Integrated Public Alert and Warning System (IPAWS). The siren system's effectiveness is limited in that it only informs the public to turn their attention to news media to find out about an emergency and does not itself provide any specific information about the nature of the emergency. The IPAWS system has the advantage of providing text messages to every mobile phone in the affected areas with important information on the nature of the emergency and actions that should be taken by members of the public. PG&E also continued to provide annual calendars containing emergency

information to all members of the community. The calendars and the local pictures contained within them were generally very popular with the local residents.

The FFT and Mr. Jones then reviewed various aspects of DCP's Emergency Plan including:

- Types of Emergency Exercises and their periodicity
- Emergency Preparedness zones
- Location, functions and uses of the Joint Information Center
- PG&E's relationship with the county in performing dose assessments and making recommendations for evacuations
- PG&E's relationship with the county in performing field monitoring evolutions
- PG&E views the annual calendar as key tool in community information about emergency preparedness, risks to the community, and resources to the community afforded by DCP
- Engagement of tourists to the area, retirement of the Energy Information Center, and the distribution of reactor emergency preparedness information in hotels and restaurants.
- Monitoring and implementing recommendations for ingestion pathways for any affected farm animals or crops
- Possible roles of the DCISC during an actual emergency at DCP.

The FFT also discussed with PG&E how outreach and consultations were made with native American tribal entities in the area with Mr. Jones pointing out that such populations in the area were dispersed among the public and not located on any designated tribal lands. Lastly, the FFT inquired regarding the status of the Energy Education Center (EEC) and were informed that due to low use, it had been declared surplus and was being liquidated by PG&E. Mr. Jones noted that DCP was considering remodeling an existing room at the site to house some of the EEC exhibits and to be used during public tours to the site. Overall, the FFT found PG&E's programs towards public outreach and engagement were appropriate.

Conclusions: The DCISC reviewed PG&E's programs for public outreach and engagement, including those associated with Emergency Preparedness, and found them to be appropriate for educating and informing the public about the station and its activities.

Recommendations to the DCISC or PG&E: None.

3.14 Tour of Outside Equipment Areas

The DCISC FFT met with Phillippe Soenen, Strategic Initiatives Director, for a tour of plant areas containing major components outside of the plant Protected Area. The DCISC last toured an outside area of the plant during its May 2025 Fact-Finding Meeting (Reference 6.17), when it concluded the following:

A tour of the Intake Structure found it to be in good condition with only small amounts of concrete degradation.

At the request of the FFT, Mr. Soenen guided the team in touring several plant areas outside of the Protected Area. Areas toured included:

- Intake Structure Top Deck (19' Elevation)
- Old Steam Generator Storage Facility
- 230kV and 500kV Switchyards
- FLEX Equipment Storage Area (near ISFSI)
- Independent Spent Fuel Storage Facility

Overall, the FFT found that the areas toured were clean, orderly, and well lit, with observed equipment in good condition except for minor leaks. The PG&E staff accompanying the FFT highlighted the care that was being taken to protect the thriving local ecosystems (marine and land).

Conclusion: The DCISC toured the Intake Structure, Independent Spent Fuel Storage Installation, and other outside areas. The areas toured were clean, orderly, and well lit, with observed equipment in good condition.

Recommendations to the DCISC or PG&E: None.

3.15 Observe Nuclear Safety Oversight Committee Meeting (Remote)

(Because of its privacy agreement with DCP, the DCISC cannot share information regarding the details of the NSOC evaluation or subsequent corrective actions.)

The DCISC FFT remotely observed the December 11, 2025, Nuclear Safety Oversight Committee (NSOC) exit meeting. The DCISC last observed an NSOC exit meeting during its March 19, 2025, Fact-Finding Meeting (Reference 6.18), when it concluded the following:

The DCP Nuclear Safety Oversight Committee appeared to be thorough and comprehensive in their evaluations and candid in their reports.

The NSOC is a committee of five executive-level, external industry peers who are selected and appointed by DCP's Chief Nuclear Officer and have sufficient expertise to satisfy the applicable requirements of American Standards Institute/American Nuclear Society Standard 3.1, "Selection, Qualification and Training of Personnel for Nuclear Power Plants." Its purpose is to advise the

Chief Nuclear Officer and the site leadership team on nuclear safety policy and to provide an independent perspective on plant performance. The NSOC typically visits DCPD three times per year for four days each. The first three days are usually spent in the plant interviewing personnel, observing activities, and reviewing records. The exit meeting is then typically held on NSOC's fourth day of meetings for the purpose of reporting the NSOC's conclusions to the Chief Nuclear Officer and the site leadership team. The FFT observed that the NSOC members appeared thorough in their evaluations and candid in their reports, and DCPD responded to all comments with acceptance and consideration of future actions. Some of the NSOC's observations were consistent with those of the DCISC, and a few observations provided more unique and valuable perspectives on station performance. The FFT observed that PG&E was welcoming of the critique and identification of areas of improvement, and PG&E's robust engagement with NSOC was commendable. It was noted in this meeting that the Chief Nuclear Officer specifically commended the current NSOC members for using their experiences well to make observations and recommendations that could have significant benefit for improving future performance at the station.

Conclusion: The DCPD Nuclear Safety Oversight Committee appeared to be thorough and comprehensive in their evaluations and candid in their reports. PG&E's robust engagement with NSOC was commendable.

Recommendations for the DCISC or PG&E: None.

4.0 CONCLUSIONS

- 4.1 DCPD provided additional information regarding evaluations of a seal leak on the Jacket Water Cooling Pump for Emergency Diesel Generator (EDG) 2-2 and the associated Operability Determination which justified the continued operability of the EDG with the leak remaining present. The DCISC found that the Operability Determination was appropriate and that the leak was repaired about one month following its discovery.**
- 4.2 The DCISC found that Aging Management Programs for instrumentation and electrical cables were being appropriately managed by DCPD.**
- 4.3 DCPD reported that the testing and analysis of materials removed from Unit 1 Reactor Vessel Sample Capsule B was in progress, and results were expected to be available as planned in mid-2026.**
- 4.4 The regular meetings with DCPD Officers and Directors continue to be beneficial for both organizations.**
- 4.5 DCPD's Steam Generators were in excellent health, and plans for future Steam Generator inspections were appropriate.**

- 4.6 An informal meeting with several licensed and non-licensed operators provided good insights into the roles and daily routine, recruiting, career prospects, and training programs of operators at DCPD.
- 4.7 The DCISC Fact-finding Team's visit with the San Luis Obispo County Department of Emergency Services Nuclear staff was beneficial to learn about the status of the county's emergency preparedness programs and to discuss the role of the DCISC.
- 4.8 DCPD adequately reviewed the DCISC's recommendation regarding whether additional FLEX guidelines should be developed for a possible blockage of the Auxiliary Saltwater System discharge from a collapse of the Discharge Structure. It was found that no additional FLEX guidelines were needed, and the DCISC accepted this conclusion.
- 4.9 DCPD's initiative to implement the use of an Artificial Intelligence platform named Neutron for document and data search, retrieval, and reporting continued to be positive. There were no significant safety concerns associated with DCPD's current plans for the possible use of Artificial Intelligence at the station.
- 4.10 The DCISC toured areas containing Emergency Core Cooling System equipment and the Spent Fuel Pools inside the Radiologically Controlled Area. The areas toured were clean, orderly, and well lit, with observed equipment in good condition.
- 4.11 DCPD's Chemistry Program was performing well with no major issues.
- 4.12 The meeting with the NRC Resident Inspectors was beneficial, and the DCISC should continue the meetings.
- 4.13 The DCISC reviewed PG&E's programs for public outreach and engagement, including those associated with Emergency Preparedness, and found them to be appropriate for educating and informing the public about the station and its activities.
- 4.14 The DCISC toured the Intake Structure, Independent Spent Fuel Storage Installation, and other outside areas. The areas toured were clean, orderly, and well lit, with observed equipment in good condition.
- 4.15 The DCPD Nuclear Safety Oversight Committee appeared to be thorough and comprehensive in their evaluations and candid in their reports. PG&E's robust engagement with NSOC was commendable.

5.0 RECOMMENDATIONS

Recommendations to the DCISC:

- 5.1 The DCISC should further review how the Technical Specification-required Completion Time was met for an October 2025 Emergency Diesel Generator 2-2 Jacket Water Pump leak event as well as how a similar event would be handled in the future following approval of the License Amendment Request and implementation of a risk-informed Completion Time. (D12/2/25FF-3.1)
- 5.2 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.1) and is recommended for closure: *The DCISC should further review DCP's basis for developing mission times used in an operability determination for a jacket water pump seal leak on Emergency Diesel Generator 2-2 (D9/25FF-3.12).*
- 5.3 The DCISC should review the error analysis for calculations contained in the October 2025 Degradation Assessment for the Unit 2 Steam Generators. (D12/2/25FF-3.5)
- 5.4 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.7) and remains open: *The DCISC should continue its effort to develop a committee policy for responding to an emergency declaration at DCP (D3/25FF-3.12).*
- 5.5 The DCISC should review FLEX Support Guidelines for how doors can be propped open, should this action be needed in a severe accident scenario. The propping open of doors can be a useful tool in responding to an unforeseen scenario, and the plant would be well positioned to have tools and training for how operators can effectively achieve the propping open of doors. (D12/2/25FF-3.8)
- 5.6 The following previous recommendation to the DCISC was reviewed in this report (Section 3.9) and remains open: *Because the application of Artificial Intelligence tools has significant potential to change and to improve DCP's operational safety, the DCISC should review this topic frequently (D12/24FF-3.4).*
- 5.7 The DCISC should follow up on the implementation, staffing and necessary training plans for complying with the new National Pollution Discharge Elimination System and Clean Water Act 401 Water Quality Certification, and the overall strategic plan for the Chemistry Department and its interface with Operations and License Renewal. (D12/2/25-3.11)

Recommendations to PG&E:

- 5.8 The following previous recommendation to PG&E was reviewed in this Fact-Finding Meeting (Section 3.7) and is recommended for closure: *PG&E should review if DCP should have considered developing FLEX guidelines for providing an alternative discharge path for the Auxiliary Saltwater (ASW) System following a Beyond Design Basis event that may cause a collapse of the Discharge Structure or otherwise obstruct the ASW System discharge (P4/25FF-3.6).*

6.0 REFERENCES

- 6.1 “Diablo Canyon Independent Safety Committee Thirty-Sixth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2025 – June 30, 2026,” Scheduled for approval at the October 21, 2026, DCISC Public Meeting, Volume II, Exhibit D.3, Section 3.12, “Emergency Diesel Generators.”
- 6.2 “Diablo Canyon Independent Safety Committee Thirty-Fifth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2024 – June 30, 2025,” Approved October 23, 2025, Volume II, Exhibit D.2, Section 3.8, “License Renewal Application.”
- 6.3 “License Renewal Application,” submitted to the Nuclear Regulatory Commission as an enclosure to PG&E Letter DCL-23-118, November 7, 2023, NRC ADAMS Accession Number ML23311A154.
- 6.4 “Diablo Canyon Independent Safety Committee Thirty-Fifth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2024 – June 30, 2025,” Approved October 23, 2025, Volume II, Exhibit D.9, Section 3.1, “Outage Management Overview.”
- 6.5 “Supplement and Annual Update: Diablo Canyon Power Plant License Renewal Application, Amendment 1,” submitted to the Nuclear Regulatory Commission as an enclosure to PG&E Letter DCL-24-092, October 14, 2024, NRC ADAMS Accession Number ML24289A118.
- 6.6 “Diablo Canyon Independent Safety Committee Thirty-Sixth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2025 – June 30, 2026,” Scheduled for approval at the October 21, 2026, DCISC Public Meeting, Volume II, Exhibit D.3, Section 3.11, “Meet with DCCP Director.”
- 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,” Approved October 10, 2024, Volume II, Exhibit D.3, Section 3.8, “Steam Generators.”
- 6.8 Ibid., Exhibit D.4, Section 3.11, “Accompany Unit 2 Operator on Rounds.”
- 6.9 “Diablo Canyon Independent Safety Committee Thirty-Fifth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2024 – June 30, 2025,” Approved October 23, 2025, Volume II, Exhibit D.9, Section 3.5, “Meeting with San Luis Obispo County Department of Emergency Services.”
- 6.10 Ibid., Exhibit D.9, Section 3.6, “Auxiliary Saltwater Discharge Arrangement, Area Tour, and FLEX Program.”

- 6.11 “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,” Approved October 10, 2024, Volume II, Exhibit D.1, Section 3.8, “Post-Earthquake Procedures for Plant Access and the Use of FLEX Equipment.”
- 6.12 Ibid., Exhibit D.9, Section 3.2, “Response to DCISC Recommendation on the Use of Earthquake Response Procedures.”
- 6.13 “Diablo Canyon Independent Safety Committee Thirty-Fifth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2024 – June 30, 2025,” Approved October 23, 2025, Volume II, Exhibit D.7, Section 3.9, “Innovation Initiatives.”
- 6.14 “Diablo Canyon Independent Safety Committee Thirty-Sixth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2025 – June 30, 2026,” Scheduled for approval at the October 21, 2026, DCISC Public Meeting, Volume II, Exhibit D.3, Section 3.13, “Plant Tour.”
- 6.15 “Diablo Canyon Independent Safety Committee Thirty-Fifth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2024 – June 30, 2025,” Approved October 23, 2025, Volume II, Exhibit D.10, Section 3.3, “Chemistry Program.”
- 6.16 “Diablo Canyon Independent Safety Committee Thirty-Sixth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2025 – June 30, 2026,” Scheduled for approval at the October 21, 2026, DCISC Public Meeting, Volume II, Exhibit D.2, Section 3.5, “Meeting with NRC Resident Inspectors.”
- 6.17 “Diablo Canyon Independent Safety Committee Thirty-Fifth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2024 – June 30, 2025,” Approved October 23, 2025, Volume II, Exhibit D.10, Section 3.6, “Intake Structure Tour.”
- 6.18 Ibid., Exhibit D.7, Section 3.11, “Observe Nuclear Safety Oversight Committee Meeting.”