

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**Report on****Fact-Finding Meeting at DCP
on December 15 and 16, 2025****by****Per F. Peterson, Member
with Ferman Wardell and Lisa Darden, Consultants****1.0 SUMMARY**

The results of the DCISC December 15 and 16, 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. Maintenance Department Performance
2. Containment Structure Health and Inspections
3. Time-Based Surveillance Frequency / Online Monitoring
4. Observe Notification Review Team Meeting
5. Outage Performance Review
6. Online Maintenance
7. Radiation Protection Performance Post-Outage
8. Drone Activity At and Around DCP
9. Meet with Nuclear Regulatory Commission Resident Inspectors
10. Meet with DCP Officer
11. Spent Fuel Canister Corrosion Update
12. Spent Fuel Canister Corrosion –Industry Study Update
13. Probabilistic Risk Assessment Program Update
14. Station Update

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.

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 Maintenance Department Performance

The DCISC FFT met with Mike Brass, Maintenance Director, for an update on the performance of the Maintenance Department. The last Maintenance Department interface with DCISC was a Maintenance Observation during the April 17, 2024, Fact-finding meeting (Reference 6.1), when it concluded the following:

The DCISC observation of the lifting of the 10-ton Main Feedwater Pump Turbine Steam Chest by DCPD Maintenance Technicians found that the process was performed properly and carefully, using appropriate safety measures and procedures.

The DCPD Maintenance Department completed two refueling outages and five Emergency Diesel Generator (EDG) major maintenance packages in 2025, while still maintaining the rolling 12-week schedule for routine work. The department supplemented staff with approximately 50 contractors in 2025 to support this additional workload. The contractors were selected based on their skills, known performance from past experiences, and their ability to commit to a long-term assignment. This strategy allowed for establishing positive relationships and expectations on Human Performance (HU) and standards usage and contributed to successful refueling outage project execution and EDG maintenance package performance.

The Maintenance Department was the lead for large projects during both 2025 refueling outages, the largest being the Unit 1 and Unit 2 High-Pressure Turbine rotor and stator blade replacements. This involved a vendor design and material upgrade of the rotor and stator blades and was supported by vendor staff. Prior to the spring Unit 1 outage (1R25), the project was not critical path. However, unexpected indications found on the casing sealing surfaces required additional repairs and resulted in an outage extension of five days past the original 30-day schedule. These repairs required development of special plans and vendor design approval to execute, and the proper time and actions were taken to do this. The lessons learned from this unexpected discovery were incorporated into the planning for the fall Unit 2 outage (2R25) resulting in the project being critical path. This effort was successful as the original 2R25 outage schedule was 32 days and was executed in 31 days.

Maintenance Metrics were shared with the FFT team and showed the department at 100% and Green in all areas except T-week (the Nuclear Industry's term for routine work schedules)

adherence, which was Red. Mr. Brass stated this has been a long-standing issue and was due to their focus on executing large projects and EDG packages in 2025. Mr. Brass stated that the causes were understood and recovery plans were in place to improve performance. Recovery plans include prompting leader intervention before removing work from the T-week process, determining the reason for the removal, and addressing the behaviors that led to the removal of work. The FFT found the details of the recovery plan were appropriate.

Mr. Brass reported that the Maintenance Department had three HU Events and two recordable injuries to contractors in 2025. The recordable injuries occurred during the 2025 refueling outages and affected Refueling Outage Goal performance for the station (see section 3.5 – Outage Performance Review). Each event was generally described to the FFT along with the actions taken. Mr. Brass discussed the department and station leadership support to drive improvement in these areas. Two initiatives to note from this discussion are the Safety Champions and the Craftsmanship Council. The Safety Champions Initiative has been in place for approximately 1.5 years and is supported by the entire station. Daily, one person spends the entire day performing a cross-functional look at safety in the station and reports out their observations at a station meeting later in the day. Also, representatives from all departments meet on the third Thursday of every month to discuss safety at the station. Mr. Brass said his department supports this initiative with members from all shops and leadership engagement. The Craftsmanship Council is a newly formed initiative that is intended to drive a grassroots look at “how we do work”. The council has approximately 30 members from all shops that allows them to talk about issues and provide improvement opportunities with management support. As they are currently developing a charter, this will be a follow-up item for the DCISC. The FFT found that the actions the Maintenance Department and the Station are taking to drive continuous improvement were appropriate.

Conclusion: DCPM Maintenance Department performance was healthy and there was evidence of a continuous improvement culture.

Recommendation to the DCISC: The DCISC should review the charter for the Maintenance Department’s new Craftsmanship Council after its development is complete. (D12/15/25FF-3.1)

Recommendations to PG&E: None

3.2 Containment Structure Health and Inspections

The DCISC FFT met with Chris Beard, Nuclear Engineering Supervisor, and Terry Carraher, Senior Advising Engineer, for an update on DCPM’s Containment concrete and steel liner inspections on Unit 1 and Unit 2. The DCISC last reviewed Containment Structure health during its May 18, 2022 (Containment concrete) and July 20, 2022 (Containment liner) Fact-Finding Meetings (References 6.2 and 6.3, respectively), when it concluded the following:

Containment concrete: The DCPM Containment Structures were sound and appeared to have no safety issues or concerns. The structures satisfactorily passed all recent visual concrete inspections and integrated leak rate tests. The DCISC

should review the results of recent Containment steel liner inspections during a future Fact-Finding Meeting.

Containment liner: *Inspections of the Containment Liners on both units were properly performed and no issues affecting integrity were identified.*

Each Containment Structure consisted of a concrete exterior including:

- A 14 ft-6 in thick, 153 ft diameter reinforced base mat
- A 3 ft-8 in thick, 140 ft inside diameter and 142 ft high reinforced concrete cylindrical wall
- A 2 ft-6 in thick, 140 ft inside diameter reinforced concrete hemispherical dome roof

Each Containment Structure also included a steel liner consisting of:

- A 1/4 in thick mild carbon steel plate placed on top of the Containment base mat
- A 3/8 in thick mild carbon steel plate covering the inside surface of the Containment shell
- Penetration sleeves and local reinforcement of the liner around penetration openings
- Anchorage system of the liner to concrete

The Containment Structure overall has a design pressure of 47 psig at 271 °F, and was designed to sustain a 7.5 magnitude Hosgri Earthquake acceleration spectrum peak of 0.75 g. Additional loads were incorporated into the design to account for wind, pipe rupture, jet impingement, and missile impacts. The DCPD Containment Structure contained a net free volume of 2.55 million cubic feet and had a Technical Specification maximum design basis leak rate of 0.1 weight % per day used for accident calculations.

The Containment Structure was subject to the following tests/inspections:

- Visual inspections of Containment concrete surfaces per 10 CFR 50, Appendix J, and American Society of Mechanical Engineers (ASME) Section XI Code. This 100% inspection is required to be performed every five years. The most recent inspections are using direct, hands-on visual and sounding techniques via lifts and rappelling equipment. Unit 2 inspections began during Refueling Outage 2R25 in the fall of 2025, completing the outage related inspections, and the non-outage related inspections were in-progress at the time of the FFT's meeting. Unit 1 non-outage inspections will begin when the Unit 2 inspections are complete, and the outage inspections will be performed during Refueling Outage 1R26 in the fall of 2026.
- Visual inspection of the steel liner plate inside the Containment as per 10 CFR 50, Appendix J and ASME Section XI Code. These inspections are required to be performed every 40 months.
- Containment Integrated Leak Rate Tests (ILRTs) as per 10 CFR 50, Appendix J. These tests were performed every 10 years. In an ILRT, large portable air compressors are brought to the site and used to pressurize the containment building a test pressure of 42 psig. The

most recent ILRTs were conducted in June 2019 on Unit 1 (Refueling Outage 1R21) and April 2018 on Unit 2 (Refueling Outage 2R20). There were no indications or problems found during the most recent ILRTs, the results of which were previously reviewed by the DCISC as a part of its routine activities following refueling outages.

Mr. Beard discussed the progress of the concrete inspections to date as well as the qualifications and experience level of the vendor crew performing them. He noted that there have been three Notifications for indications of delamination (concrete flaking) to date. All have been entered into the Corrective Action Program for further evaluation by Civil Engineering. This process will continue throughout the inspection schedule, as previously discussed. Immediate actions, if deemed necessary, will be driven by the Corrective Action Program and final actions will be developed for all findings upon receipt of the vendor's final report and Civil Engineering's disposition. No immediate actions have been required to date, and Mr. Beard did not expect any during this inspection. DCPD expects the vendor report upon conclusion of the inspections during the Refueling Outage 1R26 in the fall of 2026. The DCISC should obtain a copy of this report for review when it is available.

The FFT briefly discussed the method of inspection with Messrs. Beard and Carraher. The previous inspections, done in 2021, were performed using a high-resolution camera mounted on a remotely controlled drone. While this provided an industrial safety benefit as there was no need for an individual to rappel down the sides of Containment, it was determined there was no time savings due to the additional verifications required for each picture taken via the drone. Also, critical information that inspectors get from physically sounding the concrete using hammer taps is absent via the drone inspections. Going forward, drone capabilities would have to be improved for it to be considered as the preferred inspection method.

The FFT inquired about the status and results of the Containment Liner inspections. Mr. Carraher reported that the Containment Liner inspections were scheduled on an American Society of Mechanical Engineers code inspection interval that spanned over two refueling cycles. For Unit 1, Containment Liner inspections were last completed during Refueling Outage 1R24 in the fall of 2023, and no inspections were required to be performed in the recently completed Refueling Outage 1R25. For Unit 2, Containment Liner inspections were last completed in Refueling Outage 2R24 in the spring of 2024. He stated that there were no significant issues identified with the steel liner or the coatings during the inspections on either unit. In general, the inspections were performed visually by personnel qualified under the code requirements. Inspections were performed across the entire accessible interior surface of the Containment using a high-power spotlight and binoculars as needed. Drawings were used to track inspection activities to ensure that all areas were covered, and minor indications were recorded and further evaluated as required by the applicable code. Most indications were found at floor levels where scaffolding and other work activities occasionally came into contact with the liner surface. All observations were entered into the Corrective Action System.

The FFT requested and was provided copies of the inspection reports for the last inspection on each unit. The results shown in the inspection reports confirmed Mr. Carraher's summary that there were no conditions identified that affected the integrity of the Containment Liner on either unit. The FFT also noted that the inspection reports also included inspections required by code and

performed on any containment penetrations that were disassembled during the outage. The FFT concluded that DCP's Containment Liners were sound and appeared to have no safety issues or concerns.

Conclusions: The DCISC found that all Containment Structure inspections were being performed as required and that they appear to have no safety issues or concerns.

Recommendation to the DCISC: The DCISC should review the Unit 1 and Unit 2 Containment concrete inspection reports, expected to be available after Refueling Outage 1R26 in the fall of 2026. The DCISC should also review DCP's disposition of this report and any resulting Notifications and repairs. (D12/15/25FF-3.2)

Recommendations to PG&E: None.

3.3 Time-Based Surveillance Frequency/Online Monitoring

The DCISC FFT met with Chris Newport, Director Quality Verification, Mark Frantz, Nuclear Engineering Manager, and Melchor De La Garza, Online Monitoring Program owner, for an overview of DCP's Time-Based Surveillance Frequency/Online Monitoring program. This program was first presented to the DCISC via a DCP presentation to the DCISC at the October 2025 Public Meeting and has not been reviewed in a prior Fact-Finding Meeting.

The Online Monitoring (OLM) program was newly implemented at DCP in 2025, prior to Refueling Outage 2R25 and after the U.S Nuclear Regulatory Commission (NRC) approved a methodology developed by Analysis and Measurement Services Corporation (AMS) in Topical Report (TR) AMS-TR-0720R2-A, "Online Monitoring Technology to Extend Calibration Intervals of Nuclear Plant Pressure Transmitters". The AMS report is a proprietary document, but a non-proprietary version was available in the NRC ADAMS Repository. Per AMS-TR-0720R2-A, "The OLM methodology presented in this topical report can be used as the technical basis to support plant-specific Technical Specification changes to switch from time-based surveillance frequency for transmitter calibrations to a condition-based calibration frequency based on OLM results."

The OLM methods can identify specific transmitters that have drifted in calibration so that these transmitters are then the focus for calibration checks. This is a key advance enabled by new technology.

This program will allow Diablo Canyon to defer or credit maintenance plans (when corrective maintenance is performed ahead of preventive maintenance schedules, this may be "credited" toward resetting the next due date) while also identifying the transmitters on both units that should be scheduled for a calibration check via reports produced from the vendor, AMS, twice per operating cycle (moving from time-based to condition-based calibrations). Per AMS-TR-0720R2-A Chapter 13, "As a defense against common-mode drift, one transmitter from each group of redundant transmitters involved in OLM must be checked for calibration at a given interval [and be called a backstop]. The backstop is a dynamic number meaning that it can change (increase or

decrease) as more history on calibration behavior of transmitters is accumulated and analyzed by each plant." Each group of OLM-amenable transmitters has an associated backstop that DCPD calculated. This means that at least one transmitter in each group will be required to be calibrated within the maximum period of their group's calculated backstop.

There are 120 transmitters in the OLM program, 60 per unit. DCPD receives mid-cycle and end-of-cycle calibration reports from AMS with recommendations to calibrate based on trends that they will exceed their set values for calibration within the timeline of an outage or next available time to remove from service. After DCPD review and validation, the information is then entered into the Corrective Action Program and outage scope. This process does not currently comply with outage milestones for scope freeze, but DCPD is partnering with AMS to make changes to comply with the milestones. The capability to use OLM to focus calibration on transmitters that are actually drifting is a major advance and provides an example where DCPD is applying new technologies to improve operational safety.

The FFT inquired about AMS's plans to use Artificial Intelligence (AI) in the future for the process of identifying transmitters for calibration. DCPD was not aware of such an initiative but stated that they would ask AMS. The FFT also asked if the NRC would be pursuing more equipment groups for inclusion in the OLM program. DCPD does not know of any additional such efforts by the NRC but stated that the Pressurized Water Reactors Owners Group is working with the NRC to pursue more equipment inclusion. The DCISC should follow up on the OLM program after a longer period of implementation to evaluate effectiveness and to learn of any improvements or additional efforts.

Conclusion: The Online Monitoring program is a very new initiative that DCPD has implemented. The implementation was done in accordance with regulatory guidance and appears to have the proper level of ownership and oversight. The capability of OLM has clear potential to increase plant operational safety by focusing maintenance activities on components that require maintenance.

Recommendations to the DCISC: Online Monitoring technology has the potential to increase plant operational safety. DCISC should add Online Monitoring to the Open Item List with a regular periodicity as determined by the DCISC. (D12/15/25FF-3.3)

Recommendations to PG&E: None.

3.4 Observe Notification Review Team Meeting

The DCISC FFT attended the DCPD Notification Review Team's (NRT's) daily meeting on December 15, 2025. The DCISC last observed an NRT meeting during its March 2022 Fact-Finding Meeting (Reference 6.4), when it concluded the following:

The March 23, 2022, meeting of the DCPD Notification Review Team was conducted efficiently and effectively. The team appropriately reviewed and dispositioned approximately 60 Notifications from the previous day.

Notifications are electronic documents used by plant personnel to identify and record plant problems, large or small, for tracking to resolution in the Corrective Action Program (CAP). Notifications are either “DAs” or “DNs.” DAs are for conditions adverse to quality. DNs are for work-only situations in which corrective actions are to take place. Each day, some 50-100 Notifications are initiated, and each one is promptly reviewed by Work Control and the Control Room Shift Manager. DCP’s threshold for submitting Notifications is very low with many of them easily addressed or fixed. Following the initial reviews, the multi-departmental NRT meets each weekday to review and approve disposition of the previous day’s Notifications. Finally, the management-based Corrective Action Review Board (CARB) performs a high-level review of selected Notifications, and the DCISC also regularly observes CARB meetings.

The NRT is responsible for evaluating and classifying each work-only DN and quality-related DA notification for appropriate disposition. DNs are assigned for all equipment/system problems for which corrective actions are necessary and for all other requested work not associated with problem resolution. Additionally, a DA notification is an electronic document created in SAP that denotes an issue as a condition adverse to quality, also called a “Condition Report.” DA Notifications are reviewed by the NRT, classified by significance level, and assigned to the organization(s) responsible for resolution by the NRT within five working days following supervisor approval and operations review.

The December 15, 2025, NRT meeting was facilitated by John Covey, Manager Performance Improvement and CAP, and the NRT reviewed approximately 80 Notifications from the previous day during the meeting. Each member had reviewed all Notifications prior to the meeting and electronically shared any comments or questions with the other NRT members. The FFT observed that the NRT members were well prepared for the meeting and knowledgeable about the notifications reviewed. Approximately 10 of the Notifications were reviewed in more detail during the meeting to address comments or questions raised by NRT members prior to the meeting.

Conclusions: The December 15, 2025, meeting of the DCP Notification Review Team was conducted efficiently and effectively. The team appropriately reviewed and dispositioned approximately 80 Notifications from the previous day.

Recommendations to PG&E or DCISC: None.

3.5 Outage Performance Review

The DCISC FFT met with Casey Weir, Manager Nuclear Outage, for an update on DCP’s outage performance in 2025. Delphine Hou, Deb Luchsinger, Harpreet Bhalla, and Jerry Bischof from the 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 DCP power operations under Senate Bill 846.). The DCISC last reviewed Outage Performance during its December 2023 Fact-Finding Meeting (Reference 6.5), when it concluded the following:

DCPP's Refueling Outage 1R24 was successfully performed. All planned scope of work was completed, and all performance goals were met except for radiation dose and post-outage reliability. The DCISC should follow up on reviewing the causes and corrective actions for Maintenance Outage 1X25 (Pressurizer Safety Valve repair) which occurred about one month after the end of the Refueling Outage.

Mr. Weir reported that both Refueling Outage 1R25 and 2R25 had all planned work completed with no significant scope deletions or additions. Notable work activities completed during the outages included the following:

- Reactor Coolant System Drain Down and Refueling
- Core Barrel removal and inspections
- Fuel Transfer System Upgrade (carts, wheels, sheaves, cables, etc.)
- Two Nuclear Instrument Replacements (Unit 2)
- High-Pressure (HP) Turbine Rotor and Stator blade Replacement
- Tank Inspections for License Renewal
- Electrical Inspections for License Renewal
- Piping Inspections for License Renewal

Mr. Weir reported that the station considered the outages very successful in managing and completing the scope of work and large projects during both 1R25 and 2R25. Compared to past refueling outages, the number of large projects, the number of supplemental workers, and the number of total work hours grew. The station-led large projects, including HP Turbine Rotor Replacement and Fuel Transfer System Upgrade, were well executed due to improved focus on pre-outage planning. Performance improved for these projects from 1R25 to 2R25 with the use of Outage Critiques and implementing lessons learned. For example, the HP Turbine work caused the spring 1R25 outage to exceed the scheduled duration of 30 days by five days due to emergent scope addition (unexpected cracks in the HP Turbine casing sealing surfaces). However, lessons learned were implemented into the fall 2R25 outage project work and the overall duration of the work was improved and the outage was executed in less time (31 days actual vs. 32 days scheduled). Also, the Fuel Transfer System Upgrade improved in duration and dose to workers.

Mr. Weir attributed the improvements in outage performance to increased Operations involvement in outage preparation, scheduling, and risk reviews, having strong staffing in the Outage Control Center (OCC), and, for the first time, publishing two schedules per day. The Operations Shift Managers (SMs) and Senior Reactor Operators (SROs) who were going to be involved with executing and driving the outages were regularly involved with schedule development and the outage safety review. This greatly improved Operations engagement in the outage which in turn, improved Operations performance. It also improved the accuracy of schedule development. The OCC staffing list is color coded based on experience level during outages: Green = two outages or more in the OCC; Yellow = one outage or has changed roles in the OCC; Red = first outage in the OCC. This allows leadership to quickly identify areas of additional oversight needed. Last, the publishing of an updated schedule twice in a 24-hour period better aligned the organization to the actual work in progress and changes to critical path since it is updated more frequently than once per day. DCPP intends to continue these practices.

Refueling Outage 2R25 performance versus goals was as follows:

<u>Performance Measure</u>	<u>Goal</u>	<u>Actual</u>	
Recordable Injuries	0	1	(not met)
Serious Injury or Fatality Events	0	0	
Nuclear Safety Issues	0	0	
Site Human Performance Clock Resets	0	0	
Foreign Material Exclusion Events	0	0	
Outage Duration (Days)	< 40	31.3	
Radiation Dose (Person-Rem)	< 30	25.548	
Power Ascension (Days)	< 4	2.083	
Reliability (Days Following Outage)	> 90	monitoring	

Regarding DCP's having exceeded the goal for Recordable Injuries, Mr. Weir noted that the Maintenance Department had one Recordable injury in each outage in 2025, (broken toe in 1R25 and broken rib in 2R25). Both occurred very early in the respective outage and immediate actions were taken to refocus on safety to prevent further events. Also, the department has taken actions to improve overall safety performance (see section 3.1 above - the Safety Champion and Craftsmanship Councils).

Conclusion: DCP's Refueling Outages 1R25 and 2R25 were successfully performed. All planned scope of work was completed, and all performance goals were met except for recordable injuries. The Maintenance Department has taken actions to address deficiencies in safety performance. DCP has initiated improvements which have continued to elevate their outage performance.

Recommendations to the DCISC or PG&E: None.

3.6 Online Maintenance

The DCISC FFT met with Jared Smith, Manager Work Control, for an update on DCP's Online Maintenance Program. Delphine Hou, Deb Luchsinger, Harpreet Bhalla, and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed Online Maintenance during its September 2024 Fact-Finding Meeting (Reference 6.6), when it concluded the following:

The DCP Online Maintenance Program had appropriate procedural controls in place to successfully accomplish maintenance during plant operation while minimizing risk.

Corrective Maintenance activities are initiated through the reporting of equipment deficiencies into the Corrective Action System as Notifications. Notifications are reviewed for significance by the Shift Manager every shift and further reviewed daily by the Notification Review Team (NRT) and the Daily Review Team (DRT). The DRT classifies and prioritizes Corrective Maintenance activities based upon the importance of the system or component and the significance of the

deficiency. Urgent deficiencies (Priority 1 – 3) are assigned to the Fix-it-Now (FIN) Team for repairs, which protects the rolling 12-week schedule for routine maintenance. The highest priority deficiencies are entered into a priority work list on the station Plan of the Day to ensure close monitoring and tracking through resolution.

Importantly, Online Maintenance can increase plant operational safety because it can address reliability for specific components without the risks associated with shutting the plant down. Because corrective maintenance performed online can improve plant operational safety, the DCISC regularly reviews the topic.

Corrective Maintenance activities that are not assigned to the FIN Team are entered into DCP's 12-week rolling matrix for maintenance activities. The 12-week rolling matrix covers DCP's pre-planned online maintenance for all the major Systems, Structures, and Components and is organized primarily upon the Surveillance Tests that are required to be performed at regular frequencies during Technical Specifications MODE 1, Power Operation. This also follows the industry guidance in AP-928, Work Management – An Institute of Nuclear Power Operations (INPO) guideline for how to plan, schedule, and execute work at nuclear power plants. By knowing which equipment is planned to be taken out of service 12 weeks ahead of time, DCP can manage the scheduling of online maintenance to minimize any increases in risk due to maintenance activities. This process for managing on-line maintenance also ensures compliance with the NRC Maintenance Rule, 10 CFR 50.65, Section (a)(3), which requires facilities to ensure that the amount of time that equipment is unavailable due to maintenance is balanced against the reliability improvements achieved by performing maintenance. The 12-week matrix process ensures this is the case by bundling all maintenance activities for a particular component into the same window of unavailability, and thereby minimizing the amount of equipment unavailability required to perform online maintenance activities.

Schedule development starts at T-30 (30 weeks prior to the scheduled maintenance) with the T-12 matrix work plus low priority items. At T-26, Engineering engages and adds items from System Health reports, projects, etc. A multi-department team is involved in helping with scoping, including Supply Chain and Planning. At T-15, the same multi-department team meets to verify progress and hand-off to Planning for preparing work orders. Scope freeze occurs at T-9 as Planning is complete. At T-7, a multi-functional Integrated Risk Review team (IRRT) reviews the scheduled maintenance activities and identifies if any are High-Risk or Very High-Risk, and assignments are made to evaluate for readiness. These evaluations get a challenge review at T-2. The IRRT is composed of representatives from Operations (a Senior Reactor Operator), Instrumentation and Controls Maintenance, Mechanical Maintenance, Electrical Maintenance, Radiation Protection, Chemistry and Environmental Services, Safety, Security, Engineering Services, Emergency Planning, and Work Planning. Normally, DCP's Work Week Manager or Outage Manager serves as chairperson for the IRRT meeting.

DCP also continues to use the Electric Power Research Institute (EPRI)-developed Phoenix Risk Model, which incorporates the plant configuration and DCP's updated Probabilistic Risk Assessment model. The Phoenix Risk Model provides a quantitative analysis of risk (i.e., changes in reactor Core Damage Frequency) presented by taking specific equipment out of service as well as that resulting from removing a number of different pieces of equipment from service at the same

time. The computer program displays the aggregate risk presented by the postulated work plan in a color context of Green, Yellow, Orange, or Red, with Red being the greatest risk.

Mr. Smith shared with the FFT initiatives the DCPW Work Management (WM) group is working on. These entail new procedures that include supporting responsibilities (all supporting departments to WM), providing teaching and learning on the T-week process to station personnel who are new to the process or need a refresher, and incorporating Power BI (Power Business Intelligence – a Microsoft data analytics tool that transforms raw data into visual dashboards to easily identify trends) for monitoring performance trends so actions can be taken earlier.

Performance metrics for DCPW WM/Online Maintenance are currently all Green and have been all Green for over three years.

Conclusion: The DCPW Online Maintenance Program is healthy and has appropriate leadership engagement and team involvement in place to successfully accomplish maintenance during plant operation while minimizing risk.

Recommendations to the DCISC or PG&E: None.

3.7 Radiation Protection Performance Post-Outage

The DCISC Fact-Finding Team met with Craig Sutton, Manager, Nuclear Radiation Protection, to discuss the health and performance of the Radiation Protection (RP) Department and their recent outage performance. The last RP-related observation for the DCISC was an As Low As Reasonably Achievable (ALARA) Review Committee (ARC) meeting during its April 2024 Fact-Finding Meeting (Reference 6.7), when it concluded the following:

The April 17, 2024, meeting of the ALARA Review Committee to evaluate the Outage 2R24 personnel radiation dose to date and dose goal appeared to be thoughtfully and effectively implemented. Outage ALARA performance to date was as expected with no surprises.

Mr. Sutton provided the team with an update on DCPW RP staffing, outage staffing hires, outage performance for high radiological jobs, and current innovations they are working on. Current RP staffing is at approved levels with no long-term openings. DCPW almost exclusively hires RP staff from the Navy which has been the model. Mr. Sutton noted that it is an expectation that all RP and Chemistry personnel have dual qualifications in both RP and Chemistry. This offers a lot of flexibility when key roles become vacant or when station needs arise.

DCPW has a large source of preferred, independent, RP workers that they hire for outage work. They have an agreement with the union to pay the supplemental RP workers union wages for the outage duration with an agreed to severance date. Prior to an outage, they send letters to the preferred RP workers and based on responses, DCPW evaluates qualifications, ranks the candidates, and then hires as needed. They typically hire 40 senior technicians and 80 deconners (radiological area cleaners) per outage and often achieve a 98-99% return rate. This has served them well for

maintaining standards performance, managing outage workload, and ensuring needed qualifications based on outage scope.

Mr. Sutton described the high dose jobs that challenged RP during the 2025 outages. They included removal and reinstallation of the core barrel, core barrel inspections, and fuel transfer system upgrades. Mr. Sutton said RP had adequate staff levels for all the projects and DCPD RP Shift Supervisor oversight was strong with his and other observations documenting sound radiological controls and enforcement in place.

The FFT asked Mr. Sutton if the RP Department was pursuing any innovation initiatives to improve performance or automate work. Two items he shared with the team were that they were 1) working with Cal-Poly on automating surveys to streamline this work and save dose and 2) installing Radio Frequency Identification (RFID) on tools in the Radiologically Controlled Area (RCA) to better prevent contaminated tools from leaving the RCA. Both initiatives are in progress, but implementation dates are not yet known.

Conclusions: The DCPD Radiation Protection (RP) department is healthy, properly staffed with qualified personnel, and has established robust plans for obtaining outage RP staff support with qualifications to safely support station needs.

Recommendation for the DCISC or PG&E: None.

3.8 Drone Activity At and Around DCPD

The DCISC FFT met with Trevor Marks, Manager Nuclear Security Operations, and Erick Gonzalez, Supervisor Nuclear Training, for an update on drone activity at and around DCPD. The DCISC last reviewed this topic during its November 2020 Fact-Finding Meeting (Reference 6.8), when it concluded the following:

DCPD monitors any drone activity near the power plant and has acted appropriately when such activity was observed in the past. In general, drone intrusions do not seem to pose a substantial risk to nuclear safety at DCPD.

A heightened awareness of drone activities near nuclear power plants began in the 2014 timeframe when the NRC issued Information Advisory 14-03, “Updated Suspicious Flight Activity Voluntary Reporting Procedures – Unmanned Aircraft Systems.” The advisory initiated a voluntary reporting system among nuclear power plants in the U.S. through which any drone sightings were reported to the NRC. The system was somewhat akin to existing reporting mechanisms for small boats that might inadvertently wander into restricted areas near nuclear power plants. This reporting system has remained in place to date and was the mechanism by which the NRC was able to track the overall nature of a potential threat and provide nuclear power plants with updated threat information when needed. In 2018, the Nuclear Energy Institute also published a technical report, NEI 18-05, “Guidance for Responding to an Unmanned Aerial System/Unmanned Aerial Vehicle within the Owner Controlled Area.” The NEI report was prepared in coordination with various

federal agencies and provided additional reporting guidelines, recommended site action checklists, and a list of references and resources.

Regarding sightings specifically at DCP, there have not been any in the last few years. DCP first observed multiple (approximately ten) sightings in the winter of 2017-2018 which were reported to the NRC and included in their database. In the years since 2018, there had been only a few individual and infrequent sightings at DCP and in the last few years, none. All the previous sightings at DCP were over the Owner-Controlled Area (OCA), and only a few were sighted near to the plant's Protected Area.

DCP participated in an industry task force working to obtain permanent airspace restrictions over a portion of DCP's OCA from the Federal Aviation Administration (FAA). On October 28, 2020, DCP successfully became the first nuclear power plant in the U.S. to receive the designation and remains one of two nuclear plants with this designation. The FAA airspace restriction would be designated on aeronautical charts and would provide a legal basis for prosecution of any violators apprehended by local authorities for flying drones near DCP.

DCP Security has established proactive measures for drone detection if the need arises. They have contracted with drone detection and mitigation experts to allow detection capabilities on-site. Note that mitigation actions are not legal for any groups except the Federal Aviation Administration and the Department of Defense.

Drone uses on-site are not precluded. DCP Security has an established approval process if DCP employees have a need to use a drone. For example, containment dome inspections were previously performed using a drone and a PG&E videographer occasionally obtains video around the site for communications purposes.

Conclusions: DCP continues to monitor any drone activity near the power plant and has acted appropriately when such activity was observed in the past. In general, drone intrusions do not seem to pose a substantial risk to nuclear safety at DCP.

Recommendation for the DCISC or PG&E: None.

3.9 Meeting with Nuclear Regulatory Commission 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 December 2, 2025, Fact-Finding Meeting (Reference 6.9), when it concluded the following:

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

The participants discussed the following items:

- Effects the Executive Orders have had on the NRC
- DCP's 2025 refueling outage performance
- Recent NRC Inspection Findings and Concerns

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

Recommendation to the DCISC or PG&E: None.

3.10 Meet with DCP Officers

The DCISC FFT met with Blair Jones, Vice President Business and Technical Services, and Allen Wilson, Vice President Engineering. The DCISC last met with a DCP officer during its December 2, 2025, Fact-Finding Meeting (Reference 6.10), when it concluded the following:

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

The participants discussed the current meeting agenda items, current plant status, and other items of mutual interest. The DCISC was informed of an emergent issue on Unit 1 on December 15, 2025. A Feedwater (FW) Heat Exchanger tube leak occurred and required ramping the unit to approximately 90% power to stabilize the unit. Plans were being made to shutdown Unit 1 to make repairs to the affected FW Heat Exchanger. This and future plans for FW Heat Exchanger health were discussed. The DCISC should follow-up on the findings and cause evaluation for the affected FW Heat Exchanger tube leak as well as future plans to address FW Heat Exchanger health.

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

Recommendations to the DCISC: The DCISC should follow-up on the findings and cause evaluation for the affected Feedwater Heat Exchanger tube leak that occurred on December 15, 2025 as well as future plans to address FW Heat Exchanger health. (D12/15/25FF-3.10)

Recommendations to PG&E: None.

3.11 Spent Fuel Canister Corrosion Update

The DCISC FFT met with Philippe Soenen, Director Strategic Initiatives, Performance Improvement and Organizational Effectiveness; Eric Brackeen, Manager Dry Fuel Storage Program & Decommissioning Projects; Kyle Duke, Supervisor Nuclear Engineering; and Brian Ketelsen, Director Business and Technical Services, to discuss the DCP response to additional questions from a member of the public regarding Multipurpose Canister Corrosion [Independent

Spent Fuel Storage Installation (ISFSI) canister corrosion]. DCISC Consultant Richard McWhorter, as well as Delphine Hou, Deb Luchsinger, Harpreet Bhalla, and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed the ISFSI Canister Corrosion topic during its September 2025 Fact-Finding Meeting (Reference 6.11), when it concluded the following:

DCPP provided responses to questions and concerns received by the DCISC from a member of the public regarding methods used to inspect Spent Fuel Multi-Purpose Canisters for corrosion. Additional information was requested during this Fact-Finding Meeting and later provided by PG&E. The DCISC should review this revised information during a future Fact-finding Meeting.

The revised information received in September 2025 was discussed at the DCISC October 2025 Public Meeting as part of the September 2025 Fact-Finding Report approval. Also at this meeting, the DCISC presented to DCPD several follow-up questions received from the same member of the public in response to DCPD's initial response to ISFSI canister corrosion. The DCISC approved providing these follow-up questions to PG&E so they can respond and that the DCISC would review at a future Fact-Finding meeting. See Enclosure 1 of this report for the follow-up questions received and PG&E's response.

The FFT discussed the response to the follow-up questions with the DCPD team. The response confirmed that DCPD uses appropriate equipment for visual inspections and characterization monitoring, verifies accuracy of the equipment in accordance with industry standards, monitors more often than regulatory required, and uses proper evaluation techniques for current assessments and future predictions. The DCISC determined that PG&E has adequately addressed all near-term corrosion concerns regarding ISFSI canisters and that they have implemented a conservative approach to inspection and monitoring such that a safety issue does not currently exist [there is no chance corrosion or stress corrosion cracking (SCC) will cause an on-site or off-site consequence before the next inspection].

DCPD also provided the FFT with a summary of progress in its planning for the 2027 ISFSI Canister Inspections:

- Inspection will be performed early – summer 2026
- Contracts are being developed
- Plans are to use the same vendor that did the last inspection
- Plans are to use the most up-to-date inspection equipment
- DCPD is exploring cleaning capabilities (for areas of corrosion or defect)
- Eight canisters will be inspected (minimum required is two)

The DCISC requested a presentation on the summer 2026 ISFSI canister inspections at the June 2026 Public meeting and/or the October 2026 Public Meeting. The DCISC also requested that Member Raluca Scarlat be invited to observe some of the inspections.

Conclusions: The DCISC determined that PG&E has adequately addressed any corrosion concerns regarding ISFSI canisters at DCPD and that they have implemented a conservative approach to inspection and monitoring such that a safety issue does not currently exist.

Recommendations to the DCISC:

The DCISC should request that PG&E make a presentation on the summer 2026 Independent Spent Fuel Storage Installation inspection campaign at the June or October 2026 Public Meetings and that Member Raluca Scarlat be invited to observe some of the inspections. (D12/15/25FF-3.11A)

The DCISC should continue to monitor advances in canister inspection methods. (D12/15/25FF-3.11B)

Recommendations to PG&E: None

3.12 Spent Fuel Canister Corrosion –Industry Study Update

The DCISC FFT met with Philippe Soenen, Director Strategic Initiatives, Performance Improvement and Organizational Effectiveness; Eric Brackeen, Manager Dry Fuel Storage Program and Decommissioning Projects; Kyle Duke, Supervisor Nuclear Engineering; and Brian Ketelsen, Director Business and Technical Services, to discuss the Electric Power Research Institute (EPRI) Study on Radiological Consequences of a Release of Radionuclides from a Spent Fuel Storage Cask. DCISC Consultant Richard McWhorter, as well as Delphine Hou, Deb Luchsinger, Harpreet Bhalla, and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC was last updated on the status of the EPRI study during its May 2023 Fact-Finding Meeting (Reference 6.13), when it concluded the following:

An industry study to analyze the dose consequences for a hypothetical through-wall crack of a spent fuel storage container was delayed until at least 2025 in order to obtain additional research data from the Department of Energy. The DCISC should continue to monitor the status of the study and review the final report after its issuance.

The following response was provided by DCPD to the DCISC FFT at the time of the meeting as a status update:

PG&E Response:

“EPRI conducted an aging management working group meeting in August 2024 and there were a number of recommendations from the working group. While progress is made on some of the items, including review of AMID database, evaluation of surface and volumetric inspection tools, the work on the consequence is not fully started yet.

Specifically, Sandia National Labs was planning to generate validation data for GOTHIC and MELCOR. However, this work is currently stopped. These codes showed that there is 6 orders of magnitude reduction in normalized aerosol mass depletion in order of 1-5 hours. Given the scope and funding requirements for the project, this needs to be a collaborative project between multiple organizations. Currently, EPRI is in discussions with both DOE and NRC to enable the generation of validation data. Even when it starts after forming collaborations, this work will take several years and there was no EPRI commitment for the completion of this work in 2025.

Additionally, under Extended Storage Collaboration Program (ESCP) Fuel subcommittee, data is being collected to gather collection of release fractions and particle sizes. Data is already available from ORNL, JRC, and other potential sources. This report is anticipated to be published in late 2026 or early 2027.

Collection of these data will enable more realistic dose calculations and reduce the excess conservatism in the models.”

This response provides a satisfactory update to the DCISC that the industry continues to pursue this information, that initial indications are that effects are small, and that DCPD continues to monitor progress.

Conclusions: The DCISC determined that PG&E’s response provides a satisfactory update to the DCISC, that the industry continues to pursue this information, that initial indications are that effects are small, and that DCPD continues to monitor progress.

Recommendations to the DCISC or PG&E: None.

3.13 Probabilistic Risk Assessment Program Update

The DCISC FFT met with Jordan Tyman, Director Nuclear Projects, Risk and Compliance, for an update of the Probabilistic Risk Assessment (PRA) Program. The DCISC last reviewed this topic during its November 2024 Fact-Finding Meeting (Reference 6.14), when it concluded the following:

DCPD’s Probabilistic Risk Assessment (PRA) Program was currently emphasizing the development of various risk-based License Amendment Requests to support extended plant operations. Overall, the PRA Program continued to provide excellent support for enhancing the safety of plant operations.

DCPD first developed a Seismic PRA during its initial licensing in 1988 and as a part of its Long-Term Seismic Program. Later, the Individual Plant Examination (for internal events) was developed followed by the Individual Plant Examination for External Events. Lastly, an evaluation for internal fires was added as a part of the plant’s transition to a Fire Protection Program based

on the National Fire Protection Association (NFPA) 805 Standard. As a result, the current PRA model includes hazards from seismic, fire, flooding, and internal events.

Mr. Tyman briefed the FFT on current risk-informed program changes that have been implemented using PRA methods and analyses through License Amendment Requests (LARs). Progress continues on these efforts since the plant is now moving into extended operations.

- Risk-Informed Completion Times
- Risk-Informed Surveillance Frequency Control Program
- Mode Change Risk Evaluations
- Risk-Informed In-Service Inspections
- Supporting the NFPA-805 Fire Protection Program
- Supporting Maintenance Rule (a)(4) Online Risk Assessments
- Risk-Informed Categorization of Systems, Structures and Components (10 CFR 50.69)

Regarding the first item on the list, Risk-Informed Completion Times, PG&E received approval of its LAR in early May 2024 and implemented the associated program changes later that same month. (The term “Completion Times” refers to the maximum time that a safety system is allowed to be inoperable before compensatory actions must be initiated according to the plant’s Technical Specifications.) Mr. Tyman explained to the FFT the implementation of this program which required full station effort and readiness. This process allows PG&E to use the Phoenix risk model to evaluate any proposed completion time changes in the context of plant conditions and to define any risk management actions that are needed to compensate for those changes. This gives Operations the ability to place compensatory measures in place to ensure plant safety when equipment is out of service and plant conditions change.

Mr. Tyman reported that PG&E received approval from the NRC of its LAR for using risk-informed categorizations of systems, structures and components under 10 CFR 50.69. PG&E is using this new approach to reclassify components as appropriate in the Control Room Ventilation, Radiation Monitoring, Feedwater, and Main Steam systems. Also, a request for extending the integrated leakage testing for the Containment systems from 10 years to 15 years is still in NRC review.

Lastly, Mr. Tyman explained that the group continues to focus on converting the PRA analysis software from “Riskman” to “CAFTA” (Computer Aided Fault Tree Analysis) as the CAFTA software had over the last few years become the industry standard. This would be followed by an update of the overall PRA model to incorporate recent changes to plant design, procedures and methodology. This effort is supported with a supplemental group from a contractor.

The DCISC FFT requested Mr. Tyman provide an update to the DCISC at the June 2026 Public Meeting with respect to:

- Updated PRA tools and methods
- How PRA is being used in the plant
- The NRC’s role in approving PRA tools and methods

Conclusions: The PRA Program and Team continue to provide excellent support for enhancing the safety of plant operations and for extended operations.

Recommendations to the DCISC: The DCISC should request that PG&E make a presentation at its June 2026 Public Meeting on updates Probabilistic Risk Assessment (PRA) tools and methods, how PRA is being used in the plant, and the NRC's role in approving PRA tools and methods. (D12/15/25FF-3.13).

Recommendations to PG&E: None.

3.14 Station Update

The DCISC FFT met virtually with Justin Rogers, DCPD Station Director, on January 14, 2026, for a station update. The DCISC's last station update was during its September 2025 Fact-Finding Meeting (Reference 6.15), when it concluded the following:

DCPD's update on recent station activities was informative, and no new major issues were identified.

Mr. Rogers provided an update on the following recent activities at DCPD as follows:

- Unit 1 Feedwater Heat Exchanger tube leak repair – upon detection of a tube leak on December 15, 2025, Operations safely reduced power to approximately 90% to stabilize the unit and protect the secondary. The station then planned and executed a forced outage to make repairs. The schedule duration was planned for 64 hours and was safely executed in approximately 44 hours. Note that a previous Feedwater Heat Exchanger tube repair outage was completed in approximately 30 days. This supports the improvements in outage performance as noted in section 3.5 above. A root cause evaluation was assigned and was in progress at the time of this presentation.
- Power production – Unit 1 tunnel cleaning is scheduled for two weekends in February 2026 (the tunnel carries Pacific Ocean water from the intake to the turbine building). This requires securing one Circulating Water (CW) pump to support the side being cleaned (east or west). Unit 1 power must be reduced to 50% to secure a CW pump. Mr. Rogers discussed the planning of this evolution and emphasized the industrial safety plans being developed.
- Leadership changes – there have been no changes in key leadership positions, however, DCPD has added a Safety Manager position.

The FFT asked for a status on the progress of electronic procedure development and usage. Mr. Rogers stated that he expected some key Operations surveillance procedures would be in effect in the near future. The DCISC should plan an observation of electronic procedure usage during the next FFM where Member Per F. Peterson is a participant.

Conclusion: DCP's update on recent station activities was informative, and no new major issues were identified.

Recommendations to the DCISC: The DCISC should schedule an observation of electronic procedure usage in the plant during the next FFM of which Member Per F. Peterson is a participant. (D12/15/25FF-3.14)

Recommendations to PG&E: None.

4.0 CONCLUSIONS

- 4.1 DCP Maintenance Department performance was healthy and there was evidence of a continuous improvement culture.**
- 4.2 The DCISC found that all Containment Structure inspections were being performed as required and that they appear to have no safety issues or concerns.**
- 4.3 The Online Monitoring program is a very new initiative that DCP has implemented. The implementation was done in accordance with regulatory guidance and appears to have the proper level of ownership and oversight. The capability of OLM has clear potential to increase plant operational safety by focusing maintenance activities on components that require maintenance.**
- 4.4 The December 15, 2025, meeting of the DCP Notification Review Team was conducted efficiently and effectively. The team appropriately reviewed and dispositioned approximately 80 Notifications from the previous day.**
- 4.5 DCP's Refueling Outages 1R25 and 2R25 were successfully performed. All planned scope of work was completed, and all performance goals were met except for recordable injuries. The Maintenance Department has taken actions to address deficiencies in safety performance. DCP has initiated improvements which have continued to elevate their outage performance.**
- 4.6 The DCP Online Maintenance Program is healthy and has appropriate leadership engagement and team involvement in place to successfully accomplish maintenance during plant operation while minimizing risk.**
- 4.7 The DCP Radiation Protection (RP) department is healthy, properly staffed with qualified personnel, and has established robust plans for obtaining outage RP staff support with qualifications to safely support station needs.**
- 4.8 DCP continues to monitor any drone activity near the power plant and has acted appropriately when such activity was observed in the past. In general, drone**

intrusions do not seem to pose a substantial risk to nuclear safety at DCPD.

- 4.9 The meeting with the NRC Resident Inspectors was beneficial, and the DCISC should continue the meetings.
- 4.10 The regular meetings with DCPD Officers and Directors continue to be beneficial for both organizations.
- 4.11 The DCISC determined that PG&E has adequately addressed any corrosion concerns regarding ISFSI canisters at DCPD and that they have implemented a conservative approach to inspection and monitoring such that a safety issue does not currently exist.
- 4.12 The DCISC determined that PG&E's response provides a satisfactory update to the DCISC that the industry continues to pursue this information, that initial indications are that effects are small, and that DCPD continues to monitor progress
- 4.13 The PRA Program and Team continue to provide excellent support for enhancing the safety of plant operations and for extended operations.
- 4.14 DCPD's update on recent station activities was informative, and no new major issues were identified.

5.0 RECOMMENDATIONS

Recommendations to the DCISC:

- 5.1 The DCISC should review the charter for the Maintenance Department's new Craftsmanship Council after its development is complete. (D12/15/25FF-3.1)
- 5.2 The DCISC should review the Unit 1 and Unit 2 Containment concrete inspection report, expected to be available after Refueling Outage 1R26 in the fall of 2026. The DCISC should also review DCPD's disposition of this report and any resulting Notifications and repairs. (D12/15/25FF-3.2)
- 5.3 Online Monitoring technology has the potential to increase plant operational safety. DCISC should add Online Monitoring to the Open Item List with a regular periodicity as determined by the DCISC. (D12/15/25FF-3.3)
- 5.4 The DCISC should follow-up on the findings and cause evaluation for the affected Feedwater Heat Exchanger tube leak that occurred on December 15, 2025, as well as future plans to address FW Heat Exchanger health. (D12/15/25FF-3.10)
- 5.5 The DCISC should request that PG&E make a presentation on the summer 2026 Independent Spent Fuel Storage Installation inspection campaign at the June or

October 2026 Public Meetings and that Member Raluca Scarlat be invited to observe some of the inspections. (D12/15/25FF-3.11A)

- 5.6 The DCISC should continue to monitor advances in canister inspection methods. (D12/15/25FF-3.11B)**
- 5.7 The DCISC should request that PG&E make a presentation at its June 2026 Public Meeting on updated Probabilistic Risk Assessment (PRA) tools and methods, how PRA is being used in the plant, and the NRC's role in approving PRA tools and methods. (D12/15/25FF-3.13)**
- 5.8 The DCISC should schedule an observation of electronic procedure usage in the plant during the next FFM of which Member Per F. Peterson is a participant. (D12/15/25FF-3.14)**

Recommendations to PG&E:

- 5.9 None.**

6.0 REFERENCES

- 6.1 “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.8, Section 3.5, “Observe DCCP Maintenance Activity.”
- 6.2 “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 28, 2022, Volume II, Exhibit D.2, Section 3.3, “Containment Structure Inspections.”
- 6.3 “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.9, Section 3.8, “Containment Liner Inspections.”
- 6.4 “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 28, 2022, Volume II, Exhibit D.7, Section 3.4, “Attend Notification Review Team Meeting.”
- 6.5 “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.5, Section 3.1, “Refueling Outage 1R24 Results.”

- 6.6 “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.3, Section 3.5, “On-Line Maintenance.”
- 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.8, Section 3.1, “Observe As Low As Reasonably Achievable (ALARA) Committee Meeting.”
- 6.8 “Diablo Canyon Independent Safety Committee Thirty-First Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2020 – June 30, 2021,” Approved October 20, 2021, Volume II, Exhibit D.4, Section 3.10, “Drone Sightings.
- 6.9 “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.4, Section 3.12, “Meet with the Nuclear Regulatory Commission (NRC) Resident Inspectors.”
- 6.10 Ibid., Section 3.4, “Meet with DCCP Officers.”
- 6.11 Ibid., Exhibit D.3, Section 3.4, “Spent Fuel Canister Corrosion.”
- 6.12 Ibid., Exhibit D.3, Enclosure 1, “DCISC Questions (Received from a Member of the Public) Regarding Multipurpose Canister Corrosion and Answers Provided by PG&E on October 7, 2025.”
- 6.13 “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 3.10, “Industry Efforts to Evaluate the Radiological Consequences of a Release of Radionuclides from a Crack in a Spent Fuel Storage Cask.”
- 6.14 “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.4, Section 3.7, “Probabilistic Risk Assessment Program.”
- 6.15 “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 3.9, “Station Update.”

DCISC Follow-up Questions (Received from a Member of the Public) Regarding Multipurpose Canister Corrosion and Answers Provided by PG&E on December 15, 2025:

These questions are numbered to correspond to the items in the September 2025 fact finding report, (Reference 6.12).

1. “PG&E has not answered regarding whether or not the lengths and depths of the verification block are representative of stress corrosion cracking. The Aspect Ratio of stress corrosion cracks as well as the tortuous path of these cracks need to be considered.”

PG&E Response:

“The verification block for equipment used to perform the visual examination does not have to contain SCC for the examination equipment to accurately identify and characterize indications on the surface of the material being inspected. The ability to identify and measure indications would be demonstrated and proven during the procedural testing of the equipment selected to perform the visual examination.

As previously stated, the verification block has surface indications of known lengths and depths that are used to validate the examination equipment remains capable of accurately characterizing indications at the surface of the material being examined, prior to, during, and after performance of the examination.”

2. “Is PG&E asserting that this new tool is capable of identifying stress corrosion cracks?”

PG&E Response:

“The purpose of PG&E’s response regarding the use of a more advanced borescope model was to signify that PG&E remains committed to utilizing inspection and examination equipment capable of providing the most accurate data possible.

However, the borescope used during the prior baseline inspection, and the borescope that is planned to be used during future multi-purpose canister aging management inspections, is capable of identifying indications that are representative of cracking at the surface of the examined locations.”

3. “PG&E indicates that the rust indications are representative of pitting corrosion. Pitting corrosion in weld regions can become stress corrosion cracking. Propagation rates in weld regions need to consider stress corrosion cracking (SCC) rates, not just pitting corrosion rates.”

PG&E Response:

“Based on the results of PG&E’s evaluation of the examination results that concluded SCC was not present, the use of SSC propagation rates to assess future inspection frequencies is not required per PG&E’s NRC approved aging management program which was established in accordance with the guidance of NUREG-2214 and ASME Code Case N-860.

However, as discussed in Section E.6.1.1 of the LRA (and see question 4 below), PG&E did conservatively consider SCC propagation rates for the locations where pitting was identified in the weld region. Use of the conservative propagation rates confirmed the next inspection interval of 5 years for the multi-purpose canister aging management program remained acceptable.”

4. “Note that at the SCC rate PG&E considered (0.06" in 5 years), through wall cracking would occur in 42 years.”

PG&E Response:

“See response to follow-up Question 3. Since no SCC has been identified, this growth rate (to yield a through-wall crack at 42 years) does not apply.”

5. “Will PG&E collect surface temperature measurements at the next inspection in order to confirm that temperatures remain high enough to preclude deliquescence? A comparison of crack growth rates is available here: TLR-RES_DE_REB-2024-10_Manuscript. The ASME Code Case N-860 crack growth rate is provided in Section 3.3. This crack growth rate is temperature dependent, for a temperature of 35 C the crack would grow 3.8 mm in 5 years, and through-wall in 16.7 years.”

PG&E Response:

“As noted in previous response to Question 9, PG&E remains engaged in the latest research and development efforts related to multi-purpose canister inspections and is evaluating the use of additional examination methods that may be used during the 2026 inspections, including collection of temperature data.”

6. No follow up
7. “Is PG&E confident of the accuracy for features with high aspect ratio (depth>>>width)? On what basis?”

PG&E Response:

“PG&E is confident in the accuracy of the examination results. See responses to follow-up Questions 1 and 2 related to examination equipment capabilities and accuracies.”

8. “Has PG&E demonstrated that the tools applied to evaluate inspection results that did not meet the acceptance criteria (item 6 of Table A-2 in the LRA) are capable of observing CISCC if present? How?”

PG&E Response:

“See responses to follow-up Questions 1 and 2 related to examination equipment capabilities and accuracies.”

9. No follow up

10. No follow up

11. No follow up