

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

Report on

Fact-Finding Meeting at DCP on January 20 and 21, 2026

by

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1.0 SUMMARY

The results of the DCISC January 20 and 21, 2026, 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. Unit 1 Feedwater Heater Leak and Shutdown for Repair
2. Plant Tour
3. Boric Acid Corrosion Control Program
4. Emergency Communications and Tour of Kendall Road Emergency Facilities
5. Artificial Intelligence Uses at DCP
6. Corporate Employee Safety Culture
7. Staffing Update
8. Meet with DCP Officers
9. Use of Common Cause Evaluations in the Corrective Action Program
10. Reactor Vessel Embrittlement Sample Capsule B Update
11. Station Update
12. Meet with Nuclear Regulatory Commission (NRC) Resident Inspectors
13. Safety-Security Interface
14. Quality Verification Program

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.

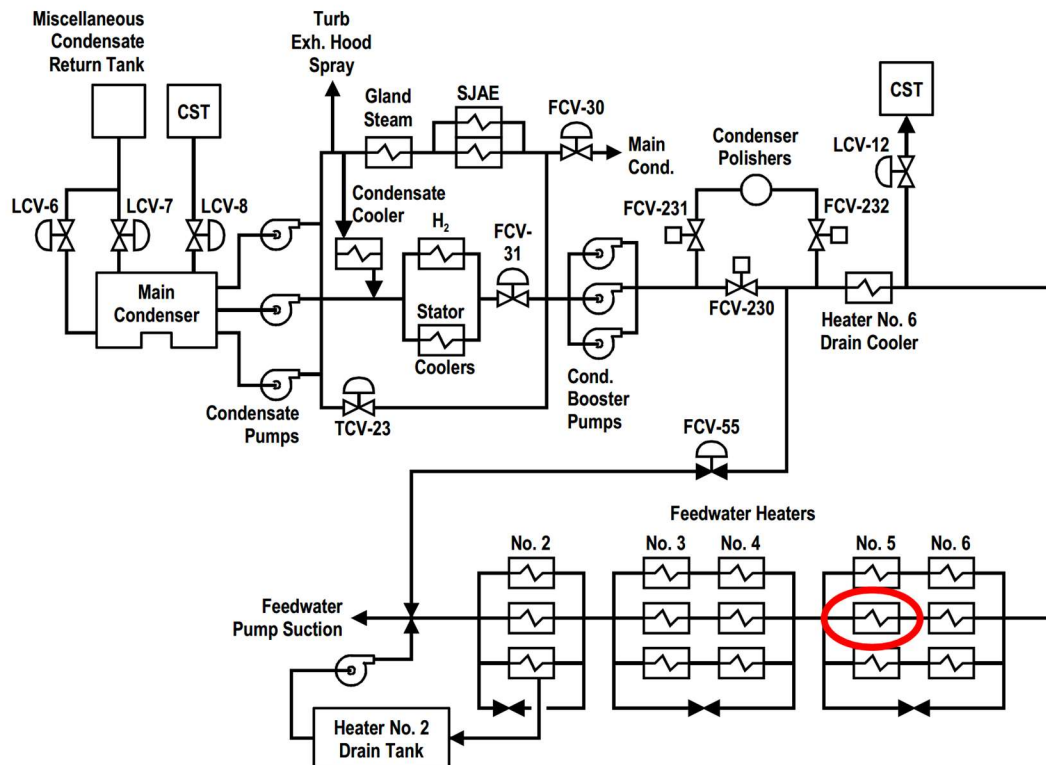
3.0 DISCUSSION

3.1 Unit 1 Feedwater Heater Leak and Plant Shutdown for Repair

The FFT met with Dan McBride, Operations Director; Michael Jackson, Engineering Services Director; and Mark Sciacca, Nuclear Projects Director, for an update on a December 15, 2025, event regarding the identification of a leak in Unit 1 Feedwater Heater (FWH) 5C and a subsequent plant shutdown for repair. Delphine Hou, Harpreet Bhalla, Deb Luchinger, and Jerry Bischof from the Department of Water Resources (DWR) along with DCISC Consultant Lisa Darden 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.) This was the DCISC's first in-depth review of this event which was followed by a plant tour of turbine building areas containing the FWHs for both Unit 1 and Unit 2 (Section 3.2 below). This event was briefly discussed with station management during the DCISC's December 15, 2025, Fact-Finding Meeting (Reference 6.1) when the following recommendation was opened for follow-up:

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)

DCPD's FWHs are shell and tube heat exchangers which take low-grade (extraction) steam from the Main Turbines to pre-heat Condensate and Feedwater prior to entering the Steam Generators to increase the thermal efficiency of the plant. Condensate and Feedwater flows inside the heat exchanger tubes and is heated by steam flowing through the shell side. Condensate and Feedwater flowing through the tubes of the FWHs generally operates at a higher pressure than the steam flowing through the shell. DCPD uses one stage of Feedwater heating (Number 1 FWHs) and five cascading stages of Condensate heating (Numbers 2 through 6 FWHs). The FWHs are arranged in three parallel trains (A, B and C) for a total of 18 FWHs per unit. The cascade flow begins with Number 6 FWH and ends with the Number 2 FWH on the Condensate System followed by flowing to the Number 1 FWH on the Feedwater System and then to the Steam Generators. A diagram of the Condensate System showing the Number 2 through 6 FWHs is shown below (a Number 5 FWH is circled in red).



Mr. McBride provided the FFT with an explanation of the event timeline, operator actions, and decisions made during the event. At about 8:00 a.m. December 15, 2025, Unit 1 Control Room Operators received an alarm indicating a high level in FWH 6C. Operators were dispatched to the area to observe conditions, and they identified that the (shell side) drain valve on FWH 5C was open and diverting large amounts of water from FWH 5C to FWH 6C. Other indications such as temperatures and drain valve positions were checked, and the operators concluded that a tube leak was occurring in FWH 5C. Operations Shift Management (Senior Reactor Operators) promptly decided to reduce Unit 1 power by about 9% and isolate the 5C and 6C FWHs in accordance with plant procedures. (The Numbers 5 and 6 FWHs are configured such that they were required to be isolated as a pair.) The power reduction was completed, and the two FWHs were successfully isolated by about 11:00 a.m. on December 15.

Following isolation of the 5C and 6C FWHs on December 15, station management continued to gather information and plan repairs. The station could operate for an extended period with the two non-nuclear safety related FWHs isolated, and repairs could not be completed while the unit was online. As it was not desirable to continue to operate with the FWHs isolated for the extended period until the next scheduled refueling outage in the fall of 2026 due to the reduction in power and efficiency, managers decided to shut down the unit and complete repairs as soon as possible. A Unit 1 power reduction began about 12:15 p.m. on December 16, and the Reactor and Main Generator were taken offline about 11:40 p.m. on December 16.

Once the unit was offline, repairs were initiated and completed approximately 44 hours later. The head was removed from FWH 5C, and leak checks readily identified the leaking tubes. Additional

Eddy Current Tests (ECTs) were performed on adjacent tubes to identify other tubes that had been damaged, and a total of 27 tubes (of 690 total tubes) were plugged during the repair activity. Following repairs, Unit 1 was restarted with the Reactor and Main Generator coming online about 8:15 p.m. on December 18 and the unit reaching nominal full power at about 9:00 a.m. on December 19. The FFT inquired whether there were any other plant issues that occurred during the shutdown and startup, and Mr. McBride reported that there were no issues and both personnel and equipment performed well during the shutdown and startup. Regarding other maintenance activities that may have been completed during the short shutdown, PG&E reported that there were several minor maintenance activities completed, but no other major repairs were attempted during the shutdown.

The FFT then reviewed with the PG&E staff the actions that were taken in response to a previous FWH tube leak event that occurred on October 15, 2021, on Unit 2 FWH 5B. The DCISC previously reviewed the 2021 event and its comprehensive Root Cause Evaluation (RCE, SAPN 51133724, dated December 22, 2021) during its January 2022 Fact-Finding Meeting (Reference 6.2), its February 2022 Public Meeting (Reference 6.3), and its August 2022 Fact-Finding Meeting (Reference 6.4). A significant focus of the DCISC's previous reviews was on causes of the failure and the appropriateness of corrective actions initiated by the RCE. The RCE concluded that the 2021 failure was probably caused by fatigue fracture of the FWH tubes driven by excessive vibration of unsupported tube lengths due to breaches in the drain cooler shroud. The drain cooler shroud is in a region of the FWH shell that contains mixed steam-water flow and is susceptible to material erosion from the vapor-liquid mixture. Corrective actions included implementing additional FWH internal inspections and performing preventive tube plugging based on inspection results. Due to the internal arrangement of the FWH, options for internal modifications or refurbishments were limited. More extensive and strategic corrective actions that could be taken (such as FWH replacement) were not considered to be feasible in the 2021 to 2022 timeframe given the plan at the time to cease operations in 2025, only three years later. Additionally, the 2021 RCE identified problems in alarm response procedures, the interpretation of local instrument data, and operator diagnosis. Training, procedures and field instruments were modified to improve operator proactive diagnosis and preemptive planned responses to any future FWH tube failures. The responses to this most recent FWH leak illustrated the effectiveness of these improvements, with isolation of the leaking FWH taking place three hours after the level alarm.

The PG&E staff members reported that the FWH health monitoring efforts that were initiated by the December 22, 2021, RCE were still in effect and that extensive evaluations and monitoring had been regularly performed on all FWHs. The Unit 1 FWH 5C that failed during this event (2025) was classified as the FWH with the "second highest risk" for failure at the station. The risk-ranking was based on a combination of ECT data (known defects) and the number of tubes already plugged in each FWH. FWH 5C had been inspected using ECT during the last Unit 1 Refueling Outage (1R25) in the spring of 2025, and all deficiencies identified at that time were repaired. Following the recent repairs, Unit 1 FWH 5C also had a very low margin for thermal performance and only a small number of tubes (seven) could be plugged in the future without taking other actions (such as machining holes in the divider plate). In general, DCP staff believed that the corrective actions from the 2021 RCE had proven to be very effective in serving as a tactical bridging strategy until such time as the FWHs could be replaced; however, the ultimate fix

to prevent future leaks continued to be conducting a full replacement of the tube bundles (or the entire FWH) which were installed in 1987 and are at the end of useful life.

Regarding the other problems and corrective actions in the 2021 RCE, Mr. McBride reported that the station considered the actions taken to improve operator diagnosis and response were fully successful. Operators were able to accurately diagnose this event in a timely fashion and responded appropriately without having to wait for assistance or instructions from other organizations (management, engineering, or maintenance). Additionally, maintenance preparation and pre-planning were in place such that the duration of the repairs was minimized and significantly improved for this recent repair over the time that was required for repair in 2021 (44 hours versus 30 days in 2021).

The FFT discussed several other aspects of the 2021 RCE with the PG&E staff, and the FFT concluded that the previous RCE appeared generally to have been effective in driving appropriate corrective actions following the 2021 leak event. The FFT inquired about what process would be used for evaluating the most recent event, and PG&E staff responded that a Cause Evaluation (CE) had been initiated in response to the most recent tube leak. They believed that an RCE was deemed unnecessary as the failure mechanism was similar and consistent with the previous RCE and, as such, they did not expect to learn anything new about the failure mechanism. The CE would focus on identifying possible additional monitoring or actions that could be taken to further reduce the risk of future failures until such time that the FWHs could be replaced. The FFT recommends that the DCISC review the results of the CE following its completion.

Mr. Sciacca then briefed the FFT on the status of plans for future FWH replacements. With the passage of SB 846 in 2022 and the state direction to pursue five years of extended operations, PG&E had initiated a project to replace all the Numbers 3, 4, 5 and 6 FWHs (12 heaters per unit; 24 total). The project was centered around the broad scope of 12 heaters per unit because the physical layout and interferences in the plant made it impossible to replace a smaller number of FWHs without first removing other FWHs. The remaining Numbers 1 and 2 FWHs were in better condition, and their locations make them much easier to access without removing other FWHs. (The FFT later directly observed the configuration issues in the areas of the Numbers 3, 4, 5 and 6 FWHs during its plant tour in Section 3.2 below.)

Phase 1 of the FWH Replacement Project is focused on engineering, procuring, and planning for the replacements. Phase 2 of the project would be the actual replacement of FWHs in the units. (The DCISC was previously aware of these actions and reviewed overall planning for major projects during several Fact-Finding Meetings and Public Meetings over the last three years.) Phase 1 had been moving forward since the decision was made to extend operations in 2022. Of the total 24 replacement FWHs being needed and procured for the two units, 18 were expected to be delivered in late 2026 and 6 were expected to be delivered in early 2027. For the Numbers 5 and 6 FWHs, only replacement tube bundles were being procured and the shells, which were located inside the Main Condenser, would be retained. Inspections were completed on the FWH shells and the results demonstrated that the Numbers 5 and 6 FWH shells were in good condition. For the Numbers 3 and 4 FWHs, entire units (shells and tube bundles) were being procured since all of the Numbers 3 and 4 FWHs were required to be removed to allow for replacement of the Numbers 5 and 6 FWHs due to the physical layout and interferences.

Currently, DCPD did not have a specific date for Phase 2 (replacements) to occur because of the lack of clarity on whether expending funds for replacement would be prudent given that operations beyond 2030 were not currently authorized by the state. However, completion of Phase 1 and receiving the FWHs on site would place the station in a position to initiate replacements as soon as clarity about future operations was received or if more FWH tube failures occurred in the near future. The FFT recognized the technical aspect and prudence for moving forward with Phase 2 but also believed that it would be wise to consider moving forward with replacements as soon as possible given the likelihood that operations may extend beyond 2030 and the need to avoid unnecessary plant shutdowns, forced outages, and startups in the future.

Conclusion: A Unit 1 5C Feedwater Heater leak that occurred on December 15, 2025, and the subsequent plant shutdown for repair was well managed by DCPD staff. Actions taken in response to a similar event in 2021 appeared generally to have been effective in driving appropriate corrective actions, and DCPD will perform a new Cause Evaluation for the 2025 event to gather any needed additional corrective actions. DCPD is proceeding with procuring 12 replacement Feedwater Heaters for each unit, and the new equipment will arrive on site in late 2026 and early 2027; however, no plan has yet been approved for installation of the replacement heaters in the units.

Recommendations to the DCISC:

In its 34th Annual Report dated June 30, 2024, the DCISC recommended to the California Public Utilities Commission (CPUC) that they “and all other necessary California state authorities support the funding of the plant upgrade projects recommended by DCPD.” Consistent with this previous recommendation and subsequent technical evaluations by the DCISC, the DCISC should further recommend to the CPUC that it and all other cognizant California state authorities support the implementation of the Feedwater Heater replacement project at DCPD as soon as practically feasible. The DCISC believes that these replacements are important for the plant’s operational performance by avoiding unnecessary plant shutdowns, forced outages, and startups in the future. (D1/26FF3.1)

The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting and remains open: *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.

3.2 Plant Tour

The FFT met with Dan McBride, Operations Director, and Mark Sciacca, Nuclear Projects Director, for a tour of Unit 1 areas containing the Feedwater Heaters discussed in Section 3.1 above. The DCISC last toured an area in the plant during its December 2, 2025, Fact-Finding Meeting (Reference 6.5), when it concluded the following:

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.

At the request of the FFT, Messrs. McBride and Sciacca guided the team in touring the following areas:

- Units 1 and 2 Turbine Deck (140' Elevation)
- Unit 1 Turbine Building (104' Elevation), Feedwater Heaters (FWHs) 3A through 6C (12 Feedwater Heaters)
- Unit 2 Turbine Building (104' Elevation), FWH 5B (location of 2021 Feedwater Heater leak event)
- Unit 1 Turbine Building (140' Elevation), at opening looking down on FWHs 1A through 2C (6 Feedwater Heaters)

The FFT learned much regarding the complexity of replacing the FWHs due to movement interferences in the area. The FFT also observed areas around the Feedwater Heater Level Control Valves including their instrumentation and controls that are regularly monitored on operator rounds. Overall, the FFT found that the areas toured were clean, orderly, and well lit, with equipment in good condition. Selected pictures of areas toured by the FFT were as follows:



Mr. McWhorter, Dr. Meshkati, and PG&E Staff at Unit 1 FWHs



PG&E Staff, Dr. Meshkati, and Mr. McWhorter at a Unit 1 FWH Level Control Valve

Conclusion: The DCISC toured areas containing the Units 1 and 2 Feedwater Heaters in the Turbine Building observing the complexity of heater replacement movement paths and the operation of Level Control Valves. The areas toured were clean, orderly, and well lit, with observed equipment in good condition.

Recommendations to the DCISC or PG&E: None.

3.3 Boric Acid Corrosion Control Program

The DCISC FFT met with Michael Jackson, Engineering Services Director; Dallas Adams, Program Engineering Manager; and John Boyle, In-Service Inspection (ISI) Engineer, for an update on DCP's program for managing Boric Acid Corrosion Control (BACC). The DCISC last reviewed this topic during its April 2021 Fact-Finding Meeting (Reference 6.6), when it concluded the following:

DCPP's Boric Acid Corrosion Control Program was being effectively implemented in accordance with the applicable industry guidelines. The number of identified leaks was at an acceptable level, and leaks were being properly monitored and tracked for repairs.

DCPP, like other nuclear power plants, uses boric acid in the Reactor Coolant System for long-term, slow reactivity control along with the fast-acting control rods. Boron absorbs neutrons, and as the reactivity in the nuclear fuel drops due to burnup, the concentration of boron in the coolant

is reduced. The use of boric acid makes the coolant more corrosive to carbon steel components, and this potential for corrosion must be properly managed to avoid equipment damage. Most primary system components are formed from stainless steel and are not susceptible to corrosion from boric acid. The DCPD BACC Program is controlled by procedures ER1.ID2, "Boric Acid Corrosion Control Program," Revision 9, and AD4.ID2, Plant Leakage Evaluation, Revision 15, copies of which was provided to and reviewed by the FFT. The DCPD Inservice Inspection (ISI) Group has overall responsibility for the BACC Program.

The BACC Program procedure provides instructions for documenting and evaluating boric acid leaks and any resulting material damage. Mr. Boyle reported that his group inspects accessible areas every six months, and inaccessible areas (primarily inside Reactor Containment) once every refueling cycle. Additionally, Operations staff are trained specifically in how to visually identify and report boric acid leaks during their routine area inspections, including their monthly inspections inside Reactor Containment. Leaks are typically identified visually by the white coating of boric acid crystals on the leak area.

Any identified leaks are recorded via Notifications into the Corrective Action System and reviewed by the Boric Acid Review Team. The Boric Acid Review Team is made up of representatives from many station functional areas and determines the required corrective actions and schedule for completion. Minor leaks may be corrected by tightening or re-torquing fasteners, adjusting valve packing, repairing gaskets, or repacking leaking valves. Long-term corrective actions include upgrading valve packing materials and loading configurations, gasket replacement, protective coatings and cladding to impede boric acid attack, material changes to replace low carbon steel with corrosion-resistant materials, or other design modifications. Additionally, qualified inspectors from the ISI Group inspect the leak area to determine if the boric acid has caused any damage to equipment. If damage is found, it is reviewed by qualified engineers to evaluate the extent of the damage and determine any impact on the functionality of the component. If a leak cannot be promptly repaired, a reinspection interval is established to ensure the continued functionality of the component.

The BACC Program status is reflected in part by the significance and number of boric acid leaks being tracked, and the number of leaks is regularly included as a performance indicator in the monthly Plant Performance Improvement Report. Plant leaks are classified as follows:

- LK1: Affects personnel safety or causes plant shutdown
- LK2: Active leak; exhibits visual evidence of wetness.
- LK3: Inactive leak that could cause equipment damage; dry, discolored, or excessive buildup (deposits on adjacent fasteners)
- LK-4: Pump seal or valve seat leakage tracked by a system engineer

Mr. Boyle reported that the category of LK1 was not typically found on primary systems containing boric acid (or if found it would be quickly repaired). DCPD currently was tracking several active LK1 leaks on secondary systems, and the FFT saw an example of one of those leaks and its associated barriers and catch container during its tour in the Turbine Building discussed in Section 3.2 above.

Example pictures of LK2 and LK3 leaks were provided to and reviewed by the FFT along with the program performance indicator. The most recent (December 2025) Boric Acid Leak performance indicators showed “Red” (Unhealthy) statuses for both units for the last three months due the number of unrepaired leaks categorized as LK3 being about twice the goal for both units. This was a significant reduction in program performance when compared to the significantly lower number of LK3 leaks and the “Green” performance indicators present at the time of the DCISC’s last review in 2021. The FFT considered this to be degrading performance and recommends that PG&E devote additional resources as needed to repair the high number of LK3 leaks in the plant with the aim of achieving the Boric Acid Leak Maintenance performance indicator goals. (The actual number of leaks and example pictures could not be included in this report as the information was declared as confidential by PG&E.)

The FFT also discussed training and certification for leak inspectors, and Mr. Boyle reported that ISI Group staff who perform inspections are required to be certified as VT-2 (Visual and Optical Testing Level II) inspectors. Achieving this certification requires classroom training, field training, and regular vision testing. The FFT also discussed with Mr. Boyle the implications of the 2002 Reactor Head leak with major corrosion impact at another nuclear power plant, which he learned about from his peers on the industry network. Mr. Boyle in turn briefed the FFT on a recent (2025) industry event at a different nuclear power plant where a small leak developed on an instrumentation tube weld located on the bottom of the Reactor Vessel. This illustrates the good practices of proactively learning from industry experience, and it highlights the importance of monitoring primary system leaks closely, since they are of direct consequence to primary coolant boundary integrity

Conclusions: DCP’s Boric Acid Corrosion Control Program was being implemented in accordance with applicable industry guidelines; however, the number of leaks being tracked by the program was unusually high. PG&E should devote additional resources as needed to the Boric Acid Corrosion Control Program and to repair the high number of leaks classified as “LK3” (inactive leaks) in the plant.

Recommendations for the DCISC: Based on industry experience with boric acid corrosion, DCISC should implement rigorous and systematic follow-up of boric acid corrosion monitoring at DPCC. (D1/26FF3.3)

Recommendation for PG&E: PG&E should devote additional resources as needed to the Boric Acid Corrosion Control Program and to repair the high number of leaks classified as “LK3” in the plant with the aim of achieving the Boric Acid Leak Maintenance performance indicator goals. (P1/26FF-3.3)

3.4 Emergency Communications and Tour of Kendall Road Emergency Facilities

The DCISC FFT met with Tom Jones, Regulatory, Environmental and Repurposing Senior Director; Jordan Tyman, Risk and Compliance Director; and Andy Warwick, Emergency Planning Manager, for a tour of Emergency Response Facilities located at PG&E’s Kendall Road offices in San Luis Obispo, CA, and to discuss communications systems used during an emergency at DCP.

The DCISC last toured Emergency Response Facilities during its January 2025 Fact-Finding Meeting (Reference 6.7), when it concluded the following:

DCPP provided a briefing on Emergency Preparedness planning, and facilities used for responding to emergencies were toured and observed to be in good condition.

The FFT requested to tour and be briefed on the capabilities of emergency response facilities located at PG&E's Kendall Road offices in part due to discussions held at the DCISC's October 2025 Public Meeting regarding the possible use of those facilities for staging of DCISC staff in the event of a declared emergency at DCP. Messrs. Jones and Tyman briefed the FFT on the fact that the facility had been constructed to meet new regulations following the September 2011 terrorist attacks, which led to the requirement to have a facility to serve as an alternate, offsite Technical Support Center (TSC) and Operations Support Center (OSC) should the onsite facilities become unavailable during an emergency. They reported that the facilities constructed at Kendall Road exceeded the regulations with regards to building codes, power supplies, and communications capabilities. In addition to serving as an alternate TSC and OSC, the facility functioned as a backup Emergency Operations Facility (EOF) and "staging area" for PG&E, with San Luis Obispo County (SLO County) having established a backup EOF at the nearby airport. The group toured the auditorium of the facility where Mr. Warwick explained the communications and display capabilities and discussed with the FFT the occasional use of the Kendall Road facilities during emergency response drills.

At the request of the FFT, Messrs. Jones and Warwick guided the team in touring the following areas in the Kendall Road facility:

- Main Auditorium (Alternate TSC and OSC; Backup EOF) – see picture below
- Communications Room (telephone, internet, and radio capabilities)
- Outside Areas (Backup AC Power Generator and Communications Trailer)
- Offsite Decontamination Trailer (including observing a video of its use)



Mr. McWhorter, Dr. Meshkati, and PG&E Staff in the Kendall Road Conference Room (Alternate OSC and TSC)

The FFT found that the emergency response facilities at PG&E's Kendall Road offices had broad capabilities, were versatile in function, and were in good condition. The FFT requested and were provided with a copy of a critique for a drill held in the Kendall Road facilities (declared confidential by PG&E) and found that all drill objectives in the facility were satisfactorily completed with minor opportunities for improvement noted.

The FFT then requested a briefing on the capabilities of communication systems used for emergency response. In preparation for this discussion, the FFT provided PG&E with a copy of a major investigative news article (Reference 6.8) regarding problems with communications systems that hampered emergency responses during the flooding that took place in Kerr County, Texas, during the summer of 2025. Mr. Warwick reported that DCP's emergency response communications systems were broken down into two basic categories, those required for communicating to the public and those required for communication between emergency responders. The composition of these systems was governed by regulations and outlined in the site's Emergency Plan which was regularly reviewed and approved by the NRC and the Federal Emergency Management Agency (FEMA).

For the first category, communication systems used to communicate to the public, Mr. Warwick reported that the systems were provided and funded by PG&E and were operated by SLO County. Current systems included the 130 sirens located around the area as the primary alerting systems and an Emergency Alert System operated by the county that used a combination of television, radio, and the Integrated Public Alerting and Warning System (IPAWS, using texts to mobile phones) to communicate details of an event to the public.

For the second category, communication systems used by emergency responders, Mr. Warwick reported that PG&E emergency responders used a multi-band radio system that was a part of the operations radios used routinely on site and throughout the PG&E system. The county used a similar multi-band radio system but the two systems were not normally interconnected. The one exception to this was the radios used by the Fire Department at DCPD which were programmed with a channel that overlapped with a channel used by the rest of the Fire Departments in SLO County. The FFT expressed concern that the lack of interoperability of the two radio systems between SLO County and PG&E could cause problems during an emergency as was the case in Kerr County, Texas. Mr. Warwick reported that the Emergency Plan provided for SLO County to provide and install an interconnecting link between the two systems during the later phases of emergency response. Additionally, the site's physical and cyber security plans prevented the plant radios from being routinely interconnected with county systems. To address this potential problem, the Emergency Plan called for the provision of PG&E radios to county personnel and other external agencies. Additionally, if an Incident Response Center (IRC) was to be established by the county in response to a security event at the station, DCPD's response plans provided for a liaison to be sent to the IRC to act as a communications link between station personnel and the county.

Regarding the fact that radio coverage issues were a problem in Kerr County, Mr. Warwick reported that PG&E has completed coverage studies which demonstrated that the PG&E radio network has full coverage across all areas of the county. The FFT asked if the interoperability link had been tested, and Mr. Warwick replied that it was last tested in 2014 and was due to be tested again soon. The FFT concluded that PG&E's emergency response communication systems were very capable and well planned; however, the FFT was concerned about the lack of immediate interoperability between the PG&E and SLO County radio systems (other than fire departments). Also, the FFT was concerned that the link for making the systems interoperable had not been tested since 2014.

Conclusions: The DCISC's tour of emergency response facilities at PG&E's Kendall Road offices found that the facilities had broad capabilities, were versatile in function, and were in good condition. PG&E's emergency response communication systems were very capable and well planned; however, the DCISC was concerned about the lack of a means for quickly and easily establishing interoperability between the PG&E and San Luis Obispo County radio systems (other than fire departments).

Recommendation to 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).*

Recommendation to PG&E: Regarding the interoperability of PG&E radio systems with San Luis Obispo County, PG&E should initiate targeted efforts with the county to coordinate, test, and evaluate the current means of establishing interoperability between the two systems as soon as possible. Additionally, PG&E should investigate finding another means to establish interoperability between the two systems more easily and quickly during an emergency at DCPD. (P1/26FF-3.4)

3.5 Artificial Intelligence Uses at DCP

The DCISC FFT met with Jordan Tyman, Risk and Compliance Director, for an update on DCP's current and future uses of Artificial Intelligence (AI). The DCISC last reviewed this topic during its December 2, 2025, Fact-Finding Meeting (Reference 6.9), when it concluded the following:

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.

Mr. Tyman provided a brief update on the use of the AI search tool (Atomic Canyon's Neutron) at DCP as follows:

- The Neutron search tool had been in regular use at DCP since August 2025.
- Neutron's susceptibility to hallucinations (creating new, incorrect information) was very low based on its having been trained on the NRC's document database and the limiting of its search library to specific internal databases.
- Eight document repositories at DCP had been successfully added to the Neutron search library. A major remaining repository to be added was the SAP data management system which was very large and not expected to complete integration into the system until June 2026.
- New functions and features continued to be added to the Neutron search tool.

Mr. Tyman also reported that an industry effort was under way to consolidate multiple external nuclear power plant-related data repositories into a single AI-driven search engine. DCP would be working to provide its Neutron search tool with the capability for searching externally to those systems before the end of 2026. Looking ahead, DCP was also looking at the possibility of developing and using generative AI tools in several areas, such as procedure preparation, where the amount of tedious and time-consuming human tasks could be reduced by applying AI. He noted that DCP continued to have no plans for the use of AI in any systems that directly control operations at the station.

Lastly, Mr. Tyman reported that DCP was looking in the future to possibly expand the use of AI into the Performance Improvement process, the Notification Review Team process, refueling outage schedule optimization, and Electronic Work Procedures. The FFT concluded that there continued to be no significant safety concerns with DCP's current use of AI at the station.

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, and additional areas for applying the use of Artificial Intelligence were under consideration. There continued to be no significant safety concerns associated with DCP's current plans for the 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

3.6 Corporate Employee Safety Culture

The DCISC Fact-Finding Team met with Dan Winterberg, Safety Manager, to discuss safety benchmarking in areas outside of the nuclear industry and for an update on the results of a 2025 PG&E Employee Safety Culture survey. The DCISC last discussed similar topics during its January 2025 Fact-Finding Meeting (Reference 6.10), when it concluded the following:

DCP's Nuclear Safety Culture and Employee Concerns Programs were performing well with no major safety concerns having been recently identified.

Additionally in January 2025, the DCISC made the following recommendation for follow-up:

The DCISC should review the results of a PG&E employee safety culture survey following its completion. (D1/25FF-3.9A)

In response to the FFT's inquiries, Mr. Winterberg reported that benchmarking of safety in areas outside of the nuclear industry was a significant part of safety improvements undertaken by PG&E as a part of efforts began in 2023 to improve its corporate safety culture across all its operations. The 2023 effort included the development of PG&E's Safety Excellence Management System (PSEMS). The effort was led by Matt Hayes, PG&E's Vice President of Enterprise Health and Safety, who was formerly an employee at DCP. Development of PSEMS included many aspects of the Institute of Nuclear Power Operations (INPO), "Traits of a Healthy Nuclear Safety Culture," with an emphasis on correlating those aspects into an industrial safety environment. Also, the PSEMS effort included several benchmarking initiatives to major oil and gas companies, non-nuclear gas and electric utilities, and American Petroleum Institute (API) Recommended Practices. He noted that most of the company's industrial safety statistics have been trending in a positive direction since the initiation of PSEMS in 2023. A handout describing aspects of the PSEMS program was provided to and reviewed by the FFT. Mr. Winterberg also discussed with the FFT how case studies from outside the nuclear industry (such as the Macondo Well Deepwater Horizon blowout accident) were regularly used in INPO leadership training courses. Additionally, the Station Senior Director met regularly with two other California utilities to share lessons learned and exchange information on issues related to safety.

Regarding the 2025 survey of employee safety culture, Mr. Winterberg reported that the survey was complete and the results were in the process of being posted to employees. The survey was a standard product from the National Safety Council previously used by over 1,400 companies and targeted to measure employee safety perception. He reported that PG&E’s overall score on the survey was 84, which was considered a high (positive) score and indicated that PG&E scored higher than 84% of the companies surveyed. There were 22,430 employees (out of about 28,400 total employees) that completed the survey, and PG&E was committed to performing the survey every few years. In response to the FFT’s request, the following data was provided comparing the last two surveys (scores are on a scale of 0 to 100 with scores greater than 75 considered top quartile, greater than 80 considered high, and greater than 90 considered very high):

<u>Survey Result</u>	<u>2025</u>	<u>2022</u>
Employees Participating	22,430	16,048
Overall Score (employees)	84.0	78.8
Contractors Participating	6,634	4,356
Overall Score (contractors)	88.8	94.5

The FFT concluded that the corporate-wide safety culture survey results were generally positive and demonstrated an improving trend in PG&E corporate safety culture.

Conclusions: PG&E’s efforts to improve its corporate safety culture included an appropriate use of benchmarking against other non-nuclear industries. The results of a corporate-wide survey of employee safety culture completed in 2025 were generally positive and demonstrated an improving trend in perception of corporate safety culture by employees.

Recommendation for the DCISC: The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting and remains open: *The DCISC should review the results of a PG&E employee safety culture survey following its completion. (D1/25FF-3.9A).*

Recommendations for PG&E: None.

3.7 Staffing Update

The DCISC FFT met with Justin Rogers, Station Senior Director, and Michael Jackson, Engineering Services Director, for an update on DCP’s staffing plans. Delphine Hou, Harpreet Bhalla, and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed this topic during its December 2024 Fact-Finding Meeting (Reference 6.11), when it concluded the following:

DCPP reported that it is fully staffed for current and long-term operations and is planning for small future staffing decreases from normal and process improvement

attrition.

Mr. Rogers reported that prior to the passage of SB 846 in 2022, DCP's overall staffing was about 1,030 employees. Following the passage of SB 846, DCP rapidly increased staff to about 1,300 employees to cover the increased workload associated with the pursuance of license renewal and an extension of operations to 2030. PG&E considered this effort to significantly increase staff to have been a great success in obtaining the significant numbers of quality, experienced employees necessary to continue operations in a short time period. He also noted that in DCP's recent (2025) evaluation by the World Association of Nuclear Operators (WANO), this effort to increase staff numbers while maintaining competence and proficiency was evaluated as an organizational strength. The FFT inquired as to the general sources from which DCP found experienced staff and Mr. Rogers reported it was a combination of strong entry-level candidates, experienced mid-career candidates (former PG&E employees, former Navy staff, and experienced individuals from other nuclear power plants or refineries), and late career candidates (early retirees willing to return to work).

With regards to future staffing plans, Mr. Rogers stated that DCP had completed several benchmarking activities against similar nuclear power plants run by utilities with single nuclear units. Using the information gathered, DCP leaders had developed a plan to reduce staff through normal attrition and without specific layoffs. At the end of 2025, staffing was down to about 1,188 employees at the station, and a goal had been set to reduce further to about 1,132 employees by the end of 2026. For every position that was vacated through attrition, evaluations were done to determine the need for the position and how the workload could be redistributed or reduced. Additionally, a priority was being placed on any possible initiatives that could reduce employee workload such as focusing on reliability-centered maintenance practices. Messrs. Rogers and Jackson explained that the retention program under SB 846 (an annual 25% bonus) had generally been successful, and attrition within the Operations, Maintenance, Chemistry and Radiation Protection Departments had been predictable and readily managed. However, losses within the Engineering Department had been more unpredictable as employees left to pursue more hybrid/work-at-home opportunities or due to lingering uncertainty and concern about their job security after 2030. Mr. Rogers reported that the station was working to focus effort and communications on reassuring employees that they would receive transition assistance and consideration for other roles within PG&E should the plant cease operations in 2030. The FFT was satisfied that PG&E's plans for future staffing at DCP were appropriate.

Conclusions: PG&E's plans for future staffing at DCP were appropriate.

Recommendations to the DCISC or PG&E: None.

3.8 Meet with DCP 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; and Blair Jones, Vice President Business and Technical Services. The DCISC last met with a

DCPP officer during its December 15, 2025, Fact-Finding Meeting (Reference 6.1), 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.

3.9 Use of Common Cause Evaluations in the Corrective Action Program

The DCISC FFT met with Philippe Soenen, Strategic Initiatives and Performance Improvement Director; John Covey, Performance Improvement Manager; and Colt Wells, Performance Improvement Supervisor, for an update on the use of Common Cause Evaluations (CCEs) in the Corrective Action Program (CAP). The DCISC last reviewed the Cause Evaluation process during its April 2025 Fact-Finding Meeting (Reference 6.12), when it concluded the following:

DCPP's program for the use of its Organizational Learning Tools and Safety Culture Assessments as a part of Cause Evaluations and Root Cause Evaluations was generally effective in capturing and initiating appropriate corrective actions for organizational deficiencies. Areas for improvement were discussed, and PG&E initiated two Notifications to prompt further action.

During past Fact-Finding Meetings, the FFT noted that several DCPD CAP procedures discussed the use of CCEs as one of the four general types of cause evaluations used at DCPD. However, the FFT had difficulty identifying any specific guidance for the initiation and preparation of CCEs and requested that DCPD provide a briefing on the CCE program and its use as a part of the CAP. Mr. Wells explained that there was not a standalone procedure governing the use of CCEs but rather they were covered primarily under procedure OM7.ID4, "Cause Evaluation," a copy of which had been previously provided to the DCISC. Specifically, he reviewed Attachment 1 of the procedure, "Cause Determination Requirements," which listed the requirements for completing both Cause Evaluations (CEs) and Common Cause Evaluations. He explained that the CCE was very similar to a CE in its format and the process for completing an evaluation.

The FFT also inquired about how it was determined that a CCE should be performed and Mr. Wells explained that it would be initiated by either the Notification Review Team (NRT) or Corrective Action Review Board (CARB) as needed to investigate adverse trends observed via the CAP. The FFT asked if there was specific guidance for when a CCE should be performed, and Mr. Wells reported that the program's intent was to allow a flexible process for initiating CCEs

and specific guidance (beyond that already provided by CE procedures) was not needed. Typically, CCEs were intended to be used only for significant adverse trends at the station.

In response to the FFT's questions about the recent uses of CCEs at DCP, Mr. Wells explained that there were not a lot of recent CCEs. A CCE was in progress at the time of the FFT's meeting to evaluate trends in the process of lifting and landing leads at the station. (The lifting and landing of leads is a routine task required of maintenance technicians often during instrument testing by which wires are disconnected to make measurements with test equipment and then reconnected following the measurement.) Prior to that, the most recently completed CCE was from late 2024 and dealt with a negative trend in the clearance and tagging process. (Clearance and tagging is a process by which operators remove equipment from service by lining up and tagging breakers, switches, valves, etc. in a manner that isolates a piece of equipment from energy sources in order to safely perform maintenance.) A copy of this CCE was previously provided to the DCISC during its April 2025 Fact-Finding Meeting (SAPN 51238274, "Operations Clearance Adverse Trend"). The FFT reviewed the CCE and found it to be of good quality in identifying the causes and needed corrective actions for past clearance and tagging issues.

The FFT expressed a need for the CAP to be proactive in identifying precursor events and that trend evaluations were a key element of a proactive CAP. Mr. Wells agreed and explained that there were also many other aspects of the CAP that strove to be proactive a level below that of a formal CCE. He reported that the biggest example of this was the identification and tracking of Organizational Learning Opportunities (OLOs) at the station which is a separate program from the Organizational Learning Tool (OLT, which is used in RCEs and CEs) and also for improving human performance at the station. He reviewed with the FFT the process for proactively reporting, tracking, and responding to trends identified through OLOs. It was noted that OLOs were listed on Performance Improvement summary documents regularly provided to the DCISC and their use at DCP has been regularly reviewed in previous DCISC Fact-Finding Meetings.

The FFT concluded that the CCE process was a useful part of DCP's CAP which underscored the need for clear guidance for initiating and completing a CCE. However, compared to the RCE and CE process, guidance was unclear and needed further clarification and elaboration.

Conclusion: DCP's process for performing Common Cause Evaluations (CCEs) provided good quality evaluations for negative trends identified via the Corrective Action Program. However, the guidance provided by procedures for identifying the need for initiating and completing a CCE was unclear and needed further clarification and elaboration.

Recommendations to the DCISC: None.

Recommendation to PG&E: PG&E should review and improve the limited guidance in procedures for completing Common Cause Evaluations (CCEs) and elaborate when a CCE should be performed, how it should be systematically completed, and how it should be acted upon. (P1/26FF-3.9)

3.10 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, Harpreet Bhalla, and Jerry Bischof from DWR also participated remotely in the meeting. The DCISC last reviewed the status of Capsule B during its December 2, 2025, Fact-Finding Meeting (Reference 6.13), when it concluded the following:

DCPP 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.

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.
- All testing for material samples had been successfully completed, and analysis of the data was in progress.
- 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. This was expected to be completed in late May 2026.

The FFT inquired about when the final report and PG&E's evaluation would be available for review by the DCISC, and Mr. Soenen stated that the reports should be available to the DCISC following completion of PG&E's analysis in May 2026. The FFT and Mr. Soenen agreed that it would be good to aim to discuss the results of the evaluations at the DCISC's July 2026 Fact-Finding Meeting. (This future activity is tracked on the DCISC's Open Items List under item number EMB-3.)

Conclusion: DCPP 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 in July 2026.

Recommendations to the DCISC or PG&E: None.

3.11 Station Update

The DCISC FFT met with Justin Rogers, Station Senior Director, for a Station Update. The DCISC last received a Station Update during its December 15, 2025, Fact-Finding Meeting (Reference 6.14), when it concluded the following:

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

Mr. Rogers reported that both units had run at full power since the last update with the exception of the Feedwater Heater event (see Section 3.1 above). The FFT and Mr. Rogers discussed plans for future FWH replacements and the Cause Evaluation that would be completed to review the failure. Regarding Human Performance, Mr. Rogers reported that the station was focused on improving maintenance fundamentals, a part of which was evaluating a negative trend in the area of lifting and landing leads (see Section 3.9 above). He also reported that Chris Newport had been assigned to serve temporarily as the Quality Verification Director due to the extended absence of the regularly assigned director.

The FFT also discussed with Mr. Rogers the results of the recently completed corporate safety culture survey and station staff participation in leadership training classes offered by the Institute of Nuclear Power Operations.

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

Recommendations to the DCISC or PG&E: None.

3.12 Meet with Nuclear Regulatory Commission (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 December 15, 2025, Fact-Finding Meeting (Reference 6.15), 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:

- Unit 1 Feedwater Heater 5C failure and DCP's response
- NRC reporting requirements
- Recent and upcoming NRC inspections activities
- Staffing at DCP
- The use of Artificial Intelligence at nuclear power plants

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 Safety-Security Interface

The DCISC FFT met with Sam Williams, Security and Emergency Services Director, for an update on the Safety-Security Interface Program. The DCISC last reviewed this program during its March 2025 Fact-Finding Meeting (Reference 6.15), when it concluded the following:

The Safety-Security Interface Program at DCPD was properly designed and being implemented satisfactorily.

The purpose of the Safety-Security Interface Program is to assess and manage changes to safety and security activities to prevent or mitigate potential adverse effects that could negatively impact either plant safety or security. The DCISC previously received and reviewed the DCPD Procedure OM11.ID7, “Safety/Security Interface Program,” Revision 4, dated January 15, 2025, which identified management controls and processes used to establish and maintain an effective interface between nuclear safety and site security, addressing the following:

- Plant Modifications
- Procedure Changes and Emergency Plan Changes
- Emergent Operational Conditions and Maintenance Activities
- Changes to Security Plans
- Safety/Security Programmatic Reviews

Mr. Williams reviewed the history of the program and how it is implemented at DCPD. He reported that a key element of the process was the involvement of security leadership in daily operations meetings and periodic work planning meetings at the station. An example he provided was the fact that a security drill was being held during the FFT’s visit, and he described how that activity had been coordinated with the rest of the station. Another recent example occurred when Security and Maintenance personnel worked together to support the movement of the plant’s spare large transformers out of the Protected Area and into storage farther away from the ocean environment.

The FFT also inquired about how security interfaced with contract workers during outages. Mr. Williams reported that all contract workers who enter the Protected Area are required to receive background checks and be included in the station’s behavioral observation program. Most contract workers did not need access to vital areas except for those who worked in Containment.

In response to the FFT’s questions, Mr. Williams also discussed the status of training and staffing. The department had had some attrition but the number of security officers remained sufficient to keep overtime reasonably low (about 16%). Industrial safety had recently been good in the department, and the department continued to participate in several industry working groups related to safety and security. The FFT asked about how security relates with the FLEX program, and Mr. Williams reported that the security personnel do not typically have a role in FLEX response. The FFT brought to the attention the helpful advice and implications of two relevant seminal documents: International Atomic Energy Agency’s (IAEA’s) “*The Nuclear Safety and Nuclear Security Interface: Approaches and National Experiences (Technical Report, 2021)*,” and the

World Institute for Nuclear Security's (WINS's) "*Best Practice Guide 4.2 - An Integrated Approach to Nuclear Safety and Nuclear Security*," Version 2.1, 2019. The FFT concluded that the Safety-Security Interface Program at DCPD continued to be properly designed and implemented satisfactorily.

Conclusion: The Safety-Security Interface Program at DCPD continued to be properly designed and implemented satisfactorily.

Recommendations to the DCISC or PG&E: None.

3.14 Quality Verification Program

The DCISC FFT met with Chris Newport, Acting Quality Verification Director, for an update on DCPD's Quality Verification (QV) Program. The DCISC last reviewed this topic during its December 2024 Fact-Finding Meeting (Reference 6.17), when it concluded the following:

The Quality Verification report shows that they have been effective in providing expectations for high quality operations for the plant and in reporting quality plant performance.

Mr. Newport explained that the QV Department is an independent group within DCPD and, under NRC regulations, reports directly to the Senior Vice-President and Chief Nuclear Officer (CNO). He also explained that he regularly briefed the CNO every two weeks and met with department directors on a regular basis. QV's responsibilities included the following:

- Audits
- Assessments
- Quality Control Inspections for Maintenance Activities
- Material Receipt Inspections and Commercial Grade Parts Dedication
- Vendor/Supplier Audits

Regarding the procurement of Feedwater Heaters (FWHs), Mr. Newport reported that the QV Department played a major role in directly providing vendor audits and in coordinating the activities of a specialty quality contractor that was hired to perform the bulk of the FWH vendor oversight. Mr. Newport also provided a copy of the December 2025 Nuclear Quality Digest and reviewed with the FFT how it provided a high-level summary of the results of the department's audits and assessments including displaying color and trend ratings for all the station's functional areas. (The Nuclear Quality Digest is a summary document describing QV's audit and assessment findings and is regularly provided to the DCISC in its monthly document updates from PG&E.) Lastly, Mr. Newport discussed the department's participation in industry groups and conferences. The FFT concluded that the QV Department continued to perform well in fulfilling its role as an independent quality assurance group at DCPD.

Conclusions: DCPD's Quality Verification Department continued to perform well in fulfilling its role as an independent quality assurance group.

Recommendations to the DCISC or PG&E: None.

4.0 CONCLUSIONS

- 4.1 A Unit 1 5C Feedwater Heater leak that occurred on December 15, 2025, and the subsequent plant shutdown for repair was well managed by DCPD staff. Actions taken in response to a similar event in 2021 appeared generally to have been effective in driving appropriate corrective actions, and DCPD will perform a new Cause Evaluation for the 2025 event to gather any needed additional corrective actions. DCPD is proceeding with procuring 12 replacement Feedwater Heaters for each unit, and the new equipment will arrive on site in late 2026 and early 2027; however, no plan has yet been approved for installation of the replacement heaters in the units.**
- 4.2 The DCISC toured areas containing the Units 1 and 2 Feedwater Heaters in the Turbine Building observing the complexity of heater replacement movement paths and the operation of Level Control Valves. The areas toured were clean, orderly, and well lit, with observed equipment in good condition.**
- 4.3 DCPD's Boric Acid Corrosion Control Program was being implemented in accordance with applicable industry guidelines; however, the number of leaks being tracked by the program was unusually high. PG&E should devote additional resources as needed to the Boric Acid Corrosion Control Program and to repair the high number of leaks classified as "LK3" (inactive leaks) in the plant.**
- 4.4 The DCISC's tour of emergency response facilities at PG&E's Kendall Road offices found that the facilities had broad capabilities, were versatile in function, and were in good condition. PG&E's emergency response communication systems were very capable and well planned; however, the DCISC was concerned about the lack of a means for quickly and easily establishing interoperability between the PG&E and San Luis Obispo County radio systems (other than fire departments).**
- 4.5 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, and additional areas for applying the use of Artificial Intelligence were under consideration. There continued to be no significant safety concerns associated with DCPD's current plans for the use of Artificial Intelligence at the station.**
- 4.6 PG&E's efforts to improve its corporate safety culture included an appropriate use of benchmarking against other non-nuclear industries. The results of a corporate-wide survey of employee safety culture completed in 2025 were generally positive and demonstrated an improving trend in the perception of corporate safety culture by employees.**
- 4.7 PG&E's plans for future staffing at DCPD were appropriate.**

- 4.8 The regular meetings with DCPD Officers and Directors continue to be beneficial for both organizations.
- 4.9 DCPD's process for performing Common Cause Evaluations (CCEs) provided good quality evaluations for negative trends identified via the Corrective Action Program. However, the guidance provided by procedures for identifying the need for initiating and completing a CCE was unclear and needed further clarification and elaboration.
- 4.10 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 in July 2026.
- 4.11 DCPD's update on recent station activities was informative, and no new major issues were identified.
- 4.12 The meeting with the NRC Resident Inspectors was beneficial, and the DCISC should continue the meetings.
- 4.13 The Safety-Security Interface Program at DCPD continued to be properly designed and implemented satisfactorily.
- 4.14 DCPD's Quality Verification Department continued to perform well in fulfilling its role as an independent quality assurance group.

5.0 RECOMMENDATIONS

Recommendations to the DCISC:

- 5.1 In its 34th Annual Report dated June 30, 2024, the DCISC recommended to the California Public Utilities Commission (CPUC) that they "and all other necessary California state authorities support the funding of the plant upgrade projects recommended by DCPD." Consistent with this previous recommendation and subsequent technical evaluations by the DCISC, the DCISC should further recommend to the CPUC that it and all other cognizant California state authorities support the implementation of the Feedwater Heater replacement project at DCPD as soon as practically feasible. The DCISC believes that these replacements are important for the plant's operational performance by avoiding unnecessary plant shutdowns, forced outages, and startups in the future. (D1/26FF3.1)
- 5.2 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.1) and remains open: *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 Feedwater Heat Exchanger health (D12/15/25FF-3.10).*

- 5.3 Based on industry experience with boric acid corrosion, DCISC should implement rigorous and systematic follow-up of boric acid corrosion monitoring at DPCC. (D1/26FF-3.3)
- 5.4 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.4) 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).*
- 5.5 The following previous recommendation to the DCISC was reviewed in this report (Section 3.5) and remains open: *Because the application of Artificial Intelligence tools has significant potential to change and to improve DCPD's operational safety, the DCISC should review this topic frequently (D12/24FF-3.4).*
- 5.6 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.6) and remains open: *The DCISC should review the results of a PG&E employee safety culture survey following its completion. (D1/25FF-3.9A).*

Recommendations to PG&E:

- 5.7 PG&E should devote additional resources as needed to the Boric Acid Corrosion Control Program and to repair the high number of leaks classified as "LK3" in the plant with the aim of achieving the Boric Acid Leak Maintenance performance indicator goals. (P1/26FF-3.3)
- 5.8 Regarding the interoperability of PG&E radio systems with San Luis Obispo County, PG&E should initiate targeted efforts with the county to coordinate and test the current means of establishing interoperability between the two systems as soon as possible. Additionally, PG&E should investigate finding another means to establish interoperability between the two systems more easily and quickly during an emergency at DCPD. (P1/26FF-3.4)
- 5.9 PG&E should review and improve the limited guidance in procedures for completing Common Cause Evaluations (CCEs) and elaborate when a CCE should be performed, how it should be systematically completed, and how it should be acted upon. (P1/26FF-3.9)
- 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.5, Section 3.10, "Meet with DCPD Officers."

- 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 October 19, 2022, Volume II, Exhibit D.6, Section 3.12, “Feedwater Heater Tube Failure Root Cause Evaluation.”
- 6.3 Ibid., Exhibit B.6, “Minutes of the February 15-16, 2022, Public Meeting.”
- 6.4 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.2, Section 3.4, “Feedwater Heater Tube Failure Follow-up.”
- 6.5 “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 3.10, “Plant Tour Inside the Radiologically Controlled Area.”
- 6.6 “Diablo Canyon Independent Safety Committee Thirty-First Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2013 – June 30, 2014,” Approved October 20, 2014, Volume II, Exhibit D.8, Section 3.7, “Boric Acid Corrosion Control Program.”
- 6.7 “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.6, Section 3.5, “Emergency Preparedness Plan and Facilities Tour.”
- 6.8 Mike Baker, Danny Hakim, and Blacki Miglizzozi, "A Costly Radio System Faltered When Texas Needed It Most," The New York Times, October 23, 2025.
- 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 3.9, “Artificial Intelligence Uses at DCP.”
- 6.10 “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.6, Section 3.9, “Station Nuclear Safety Culture and Employee Concerns Programs.”
- 6.11 Ibid., Exhibit D.5, Section 3.10, “Staffing for Long-Term Operations.”
- 6.12 Ibid., Exhibit D.9, Section 3.4, “Cause Evaluation Process.”
- 6.13 “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 3.3, “Reactor Vessel Embrittlement Sample Capsule B Update.”

- 6.14 Ibid., Exhibit D.5, Section 3.14, “Station Update.”
- 6.15 Ibid., Section 3.9, “Meet with Nuclear Regulatory Commission Resident Inspectors.”
- 6.16 “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 3.5, “Safety-Security Interface.”
- 6.17 “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 3.7, “Quality Verification Update.”