

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

Report on

Fact-Finding Meeting at DCP on March 18 and 19, 2026

by

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1.0 SUMMARY

The results of the DCISC March 18 and 19, 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. Plant Health Subcommittee Observation
2. Meet with Nuclear Regulatory Commission (NRC) Resident Inspector
3. FLEX Support Guidelines for Propping Open Turbine Building Doors
4. Emergency Diesel Generator 2-2 Jacket Water Pump Leak Technical Specification Completion Time
5. Strategic Plan for Compliance with the New National Pollution Discharge Elimination System (NPDES) Permit
6. Meet with DCP Officer
7. Field Observation of a Maintenance Activity
8. Safety Related Direct Current (DC) Power System Review
9. Station Update
10. Units 1 and 2 Steam Generator Degradation Assessment Error Analysis
11. Meet with Individual Contributors from Various Departments
12. Preparation for Future Independent Spent Fuel Storage Installation (ISFSI) Inspections in August 2026

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 Plant Health Subcommittee Observation

The DCISC FFT observed the Plant Health Subcommittee (PHSC) meeting, which was facilitated by Dallas Adams, Engineering Programs Manager. The DCISC last reviewed a similar meeting, the Plant Health Committee (PHC), during the August 2025, Fact-Finding Meeting (Reference 6.1) when it concluded the following:

The DCPD Plant Health Committee is effectively fulfilling its function to assure plant systems and equipment remain healthy or have action plans to return to good health.

The PHSC is a designated group of station managers and other technical contributors, responsible for reviewing system and program health, assigning and reviewing plans to address issues, and advising the PHC. The PHC is a designated group of senior station leaders (directors and above), responsible for the status of station health, approval of improvement plans and requests for funding for proposed solutions, and reviewing and approving system, component, and program long range plans.

The meeting agenda included the following:

- Safety and Human Performance Message/Responsibilities
- Verify Quorum
- Introduce Visitors and Operations Personnel
- Meeting Purpose and Desired Outcomes
- Action Item Review
- Previous Meeting WELL (What Excellence Looks Like) Results
- Top Ten Equipment Issues Review
 - 480V Switchgear Warm Termination Trend
 - Turbine Control HMI (Human-Machine Interface) Adverse Trend
- Overview of Reliability Centered Maintenance (RCM) Meetings
- Review of the Top Ten Equipment Issues List
- Operations Feedback
- Meeting +/- and WELL Observation review

The FFT did not observe the first six agenda items. However, completion of the items was verified during a follow-up interview with Mr. Adams. The two specific Top Ten Issues that were reviewed were done with good collegial input and challenge from the PHSC members and attendees and both were approved to send to the PHC for final approval.

The review of the Top Ten Equipment Issues List was also conducted with good collegial input and challenge from the PHSC members and attendees. The Top Ten Equipment Issues List is a living document that is available and used by all DCPD personnel providing alignment on the top station issues. It was noted that DCPD uses a Heat Map to show the ranking of each of the issues. A Heat Map is a visual tool that plots “Probability of Failure (Unpredictability)” vs. “Consequence of Failure” and is “green” where both are low and “red” where both are high. The Heat Map had all the current Top Ten items plotted and also included newer issues not yet on the Top Ten list. The newer items were those that the PHSC was proposing to add to the Top Ten list when issues are closed. The FFT found that the Heat Map was a good tool to see the risk associated with each issue and the aggregate risk of all issues combined.

The feedback provided by the operators attending the meeting was well received and actions were taken to ensure tracking of their concerns; we observed examples of management encouraging a good understanding of the points raised by operators, which sets an example of encouraging the discussion of potential new issues, an important element of safety culture and continuous improvement culture.

The WELL Observation review provided critical and positive feedback to the PHSC.

Conclusion: The Plant Health Subcommittee (PHSC) meeting was conducted efficiently, and attendee participation was strong which added to the effectiveness of the meeting.

Recommendations to the DCISC and PG&E: None.

3.2 Meet with Nuclear Regulatory Commission (NRC) Resident Inspector

The DCISC FFT met with Eli Garcia, NRC Resident Inspector, for an update. The DCISC last met with the NRC Resident Inspectors during its January 2026, Fact-Finding Meeting (Reference 6.2), when it concluded the following:

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

The FFT inquired about and discussed the NRC re-baselining effort that is currently in progress. The NRC re-baselining is a comprehensive, risk-informed evaluation used to systematically review, prioritize, and adjust the NRC’s workload, regulatory requirements, and resource allocations by aligning NRC operations with historical industry performance data, modern technological advancements, and updated legislative goals. The FFT also discussed general plant performance, NRC inspector staffing, training and career-development in light of the re-baselining, and upcoming NRC inspection activities at Diablo Canyon.

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

Recommendations to the DCISC or PG&E: None.

3.3 FLEX Support Guidelines for Propping Open Turbine Building Doors

The DCISC FFT met with Dallas Adams, Program Engineering Manager; and Bill Conklin, Senior Consulting Engineer and FLEX* Program Owner, to review FLEX Support Guidelines for how doors can be propped open should this action be needed in a severe accident scenario. The DCISC last reviewed the FLEX Program during its December 2, 2025, Fact-Finding Meeting (Reference 6.3), when it concluded the following:

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

Additionally, the DCISC developed the following recommendation during its December 2, 2025, Fact-Finding Meeting:

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

Mr. Conklin provided an overview of the equipment and procedures that have been developed for use by the DCP staff in the event they are faced with severe accident scenario, also known as a Beyond Design Basis (BDB) event. BDB procedures were developed for the US Fleet of Nuclear Power Plants (NPP's) following the Fukushima plant catastrophes. The need for BDB response equipment and procedures was created by an initiative that included the US NPP's, the Nuclear Energy Institute (NEI), the Electric Power Research Institute (EPRI), and the USNRC.

Mr. Conklin's overview described the equipment that is stored in the control room complex that is used for securing plant doors in an open (or closed) position to support vital operation of FLEX equipment and procedures. This equipment included various doorstops, wedges, ropes, fasteners, ratcheting come-along, procedures, PPE, respirators, etc.

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

Mr. Conklin then followed up with a description of the procedures that have been developed to manage any BDB event at Diablo Canyon. The operative word for these procedures, actions, and equipment is called “FLEX” (NRC Order EA-12-049; Diverse and Flexible Coping Strategies), as it is a Flexible set of actions and associated equipment both on-site and stored at a remote offsite location that can support several NPP’s. During this discussion, the DCISC team walked through the strategies contemplated by the FLEX procedures. In the scenario of a collapse of the Discharge Structure, one of the strategies would be for the operators to cut the flexible joints immediately downstream of the Component Cooling Water Heat Exchanger in order to re-establish Auxiliary Saltwater (ASW) flow, and prop open Turbine building doors to discharge water through the building door to the outside.

As described in the December 2, 2025, Fact-Finding Report, “the ASW Pumps provide 3000 gpm each at 442 ft discharge pressure, with one pump per unit required to meet the design basis heat removal” and “FLEX Program design allowed greater than 72 hours for responding to a loss of ASW”. For a door that has an opening of approximately 6 ft x 3 ft, the required water velocity would be under 1 mph, the equivalent of a slow-moving river. 442 ft of discharge pressure would ensure more than sufficiently that water would be pushed out even if the room in which the heat exchangers are located were to flood all the way to the ceiling. The DCISC Team asked which doors would need to be propped open to allow this flow of water, and if the normal opening direction of a normally closed door would be affected by water flow against it. The response was that the FLEX training received by the Operators would enable them to select the doors and the opening mechanisms appropriate for the BDB event.

Messrs. Conklin and Adams described the training the operators, maintenance, Fire Department, and other staff members receive during FLEX training. This training helps the staff understand the versatility of the FLEX procedures to allow various coping methods depending on the event. The staff is trained on various BDB events that could happen at the plant site. These include, but were not limited to, Earthquake, High Energy Line Break (HELB), uncontrolled fire, Security Event, loss of all electricity, tsunami, etc.

As an example of a similar scenario that requires the propping open of doors, Messrs. Conklin and Adams reviewed how the FLEX procedure directs operators where and how to run electrical cables from the 85’ elevation through the staircases to the Control Room if needed. They noted that the procedure cautioned the operators to secure the electrical cables such that they do not get pinched or gouged during the running of the electrical supply cables. In this example, several doors would be required to be propped open with the equipment previously mentioned. Thus, it demonstrates that training and equipment is in place already, for the propping open of doors, should a response to a BDB require it.

During the discussion the DCISC was provided printed copies of the discussed procedures to review while the presenters referenced them during the discussion. The procedures included also a layout of the relevant part of the turbine building, and the DCISC team was able to identify which doors could be propped open to allow flow of water from the Component Cooling Water Heat Exchanger to the exterior of the building. Multiple options of doors were available, and at least one path was identified where all three doors that needed to be propped open to allow the flow of water opened outwards from the room in which the Component Cooling Water Heat Exchanger

are located. Messrs. Conklin explained that sandbags can be used to line the path of the water flow, and that all necessary equipment (see above-mentioned examples of FLEX equipment) and permissions for the propping open of all classifications of doors would be in place to respond to such a BDB event. Recent photographs of FLEX equipment relevant to the propping of doors were shared to demonstrate current inventory is on hand in abundant supply.

Conclusion: Based on its reviews of DCP's FLEX Procedures, Equipment, and Training, the DCISC concluded that the readiness of the FLEX tools for the propping-open of doors is appropriate. Based on its review of the building layout, it concluded that it is possible to ensure water flow from the Component Cooling Water Heat Exchanger to the outside of the building with the propping open only of doors that open outwards, and the FLEX equipment available was appropriate for achieving this. The staff embraced preparedness for identifying alternate methods to maintain control of the power plant during Beyond Design Basis events. DCISC will periodically review the FLEX Program in future Fact-Finding Meetings.

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

Recommendations to PG&E: None.

3.4 Emergency Diesel Generator 2-2 Jacket Water Pump Leak Technical Specification Completion Time

The DCISC FFT met with Dan McBride, Director, Nuclear Operations Services; and Jordan Tyman, Director Nuclear Projects - Risk and Compliance, to discuss how the Technical Specification required completion time was met for an October 2025 Emergency Diesel Generator 2-2 Jacket Water Pump leak event including the development and implementation of the associated compensatory measure. The FFT also had questions regarding whether the use of Risk-Informed Completion Time (RICT) would apply to this event. The DCISC last reviewed this event during its December 2, 2025, Fact-Finding Meeting (Reference 6.4), when it concluded the following:

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

Additionally, the DCISC developed the following recommendation during its December 2, 2025, Fact-Finding Meeting:

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

The EDGs are safety-related equipment whose functions are to furnish electric power when offsite power sources are unavailable to mitigate a design basis accident, to enable the reactor to continue to produce power for 72 hours when there is no accident condition, or to furnish power sufficient for an emergency shutdown of the plant. During the DCISC's September 2025 review of EDG System Health, the DCISC learned that on September 5, 2025, following maintenance activities on EDG 2-2, a jacket cooling water leak occurred from the Jacket Water Pump telltale drain (Notification 51300035). The leak, about 0.3 gallons per hour (gph; 100 drops per minute), was active only during EDG operation and was indicative of minor seal degradation on the pump. The full level of the tank is 15 inches (30 gallons), the low-level alarm is at 8 inches, and EDG inoperability would occur if water level dropped below 0 inches.

Previous Fact-Finding Meetings reviewed this event, EDG mission time, and the associated Operability Determination, Compensatory Measure, and Prudent Actions and found them all appropriate. DCPD provided the FFT an order of events from when the jacket water pump seal leak was identified to when the Technical Specification Completion Time was met including if any Compensatory Measures were established. This timeline showed that EDG 2-2 was taken out of service on September 5, 2025, for monthly surveillance testing (STP-M-9A2 – Monthly Testing of EDG 2-2) and the seal leak was discovered during this test. The 100 drops per minute (dpm) leak was immediately evaluated as minor and within allowable limits. A Compensatory Measure was not required because the local alarm and existing annunciator response procedure ensured jacket water level was maintained above the minimum level required for operability. As a conservative measure, DCPD established the following Prudent Action as an adverse condition monitoring plan:

- Daily checks of jacket water level when EDG 2-2 was not running, and
- Two-hour checks of jacket water level when EDG 2-2 was running.

EDG 2-2 was returned to service after the successful surveillance test on September 5, 2025. The jacket water pump seal leak was repaired during a scheduled emergent maintenance window from September 28 to October 2, 2025. Even though the Notification included text that mentioned a Compensatory Measure, this text was accidentally introduced and was not of relevance to this event; all subsequent actions were taken in alignment with Prudent Actions. The FFT was not provided with the specific date and time when the Prudent Actions were implemented, but this issue can be closed since it is clear now that the actions were not Corrective Actions. Implementation of a Corrective Action needs to meet completion times; Prudent Actions are not tied to Completion Times.

The FFT also discussed the use of RICT for EDGs at DCP. Messrs. McBride and Tyman informed the FFT that all Licensing Amendment Requests (LARs) for implementing RICT at DCP have been approved by the NRC and implemented. The DCP Technical Specification Completion Time for an EDG is 14 days, for the duration that the EDG can be out of service, such as during a scheduled maintenance. RICT would allow increasing this up to 30 days with the use of Probabilistic Risk Assessment (PRA), the use of Phoenix (the PRA application tool), evaluating other equipment out of service, and the implementation of various Risk Management Actions (RMAs). DCP informed the FFT that RICT was not used for the EDG 2-2 maintenance package, which was last completed a month before the Jacket Water Pump seal leak was observed, or for the repairs to the Jacket Water Pump seal during the subsequent scheduled emergent maintenance, as the planned EDG out of service times both were less than the 14 day Technical Specification completion time. Therefore, RICT was not required.

Conclusions: The DCISC reviewed how the Technical Specification-required Completion Time was met for an October 2025 Emergency Diesel Generator 2-2 Jacket Water Pump leak event as well as how a similar event would be handled in the future using Risk-Informed Completion Time and found use of the Completion Times to be appropriate.

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

Recommendation to the DCISC: The DCISC should review the workflow of interfacing with the NRC Resident Inspector for a hypothetical scenario when a Notification mentions the need for a Compensatory Action but is later identified that the system was in fact operable and did not require a Compensatory Action. (D3/26FF-3.4)

Recommendation to PG&E: None.

3.5 Strategic Plan for Compliance with the New National Pollution Discharge Elimination System (NPDES) Permit

The DCISC FFT met with Trevor Rebel, Environmental Protection Manager; and David Cortina, Manager Nuclear Environmental Services, to discuss the strategic plan for the Chemistry and Environmental Department to comply with the new National Pollution Discharge Elimination System (NPDES) permit and Clean Water Act 401 Water Quality Certification. Delphine Hou, Harpreet Bhalla, Deb Luchinger, and Jerry Bischof from the Department of Water Resources (DWR) 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 met with the Chemistry Department during its December 2, 2025, Fact-Finding Meeting (Reference 6.5), when it concluded the following:

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

Additionally, the DCISC made the following recommendation during its December 2, 2025, Fact-Finding Meeting:

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

Mr. Cortina provided a brief overview and update on the on the status of the NPDES permit and Clean Water Act certification and DCPP's plan to meet compliance. The new NPDES permit and Clean Water Act certification were approved by the California Regional Water Quality Control Board, Central Coast Region, on February 26, 2026, and will become effective on April 17, 2026. DCPP performed baseline sampling for all expected sample points prior to submitting the application for the new permit, as required. The station is in the planning phase to meet compliance with the following actions in progress:

- Contracted with a vendor for one year to perform new annual sampling. DCPP Chemistry will be providing oversight.
- Updating contracts with certified labs to perform any new types of sample analysis.
- Updating all station procedures to comply with the new permit requirements and to refer to the new permit (procedures have been identified and changes are in progress).
- Updating Training for the new sampling requirements (in progress).
- Six new sample points were identified. New procedures are being written, and they are being added to the station schedule.

Mr. Cortina described the six new sample points that the NPDES permit requires. He explained how Chemistry worked with other departments (Operation, Engineering, Licensing, etc.) to develop the methodology and determine the station conditions to properly and safely obtain these samples. This provided the necessary input to allow procedure development and schedule the samples.

Messrs. Cortina and Rebel stated they were adequately staffed and had sufficient vendor support for the future sampling requirements, and they were on track to comply with the new NPDES permit and Clean Water Act 401 certification. They stated that they will learn from the sampling vendor as they take the new annual samples and incorporate the learnings into station procedures. If staffing challenges are identified during the first year, they will address with either continued vendor support or staffing adjustments.

Conclusions: DCP's implementation, staffing and training plans for the new National Pollution Discharge Elimination System (NPDES) and Clean Water Act 401 Water Quality Certification were reviewed and are on track for meeting the compliance date of April 17, 2026. DCISC will periodically review the Chemistry Program in future Fact-Finding Meetings.

Recommendation to the DCISC: The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting and should be closed: *The DCISC should follow up on the implementation, staffing and necessary training plans for complying with the new National Pollution Discharge Elimination System and Clean Water Act 401 Water Quality Certification, and the overall strategic plan for the Chemistry Department and its interface with Operations and License Renewal. (D12/2/25-3.11)*

Recommendations to PG&E: None.

3.6 Meet with DCP Officer

The DCISC Fact-Finding Team met with Adam Peck, Site Vice President. The DCISC last met with a DCP officer during its January 20, 2026, Fact-Finding Meeting (Reference 6.6), 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 and other items of mutual interest.

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

Recommendations to PG&E or DCISC: None.

3.7 Field Observation of a Maintenance Activity

The DCISC FFT met with Chris Kenison, Supervisor Nuclear Maintenance – Instrument and Control (I&C), to perform a field observation of a maintenance activity, along with the associated pre and post-job briefs. The DCISC last observed a maintenance activity during its April 2025, Fact-Finding Meeting (Reference 6.7), when it concluded the following:

DCP's planning for a work activity (Component Cooling Water pipe snubber replacement) that required a formal risk evaluation and the implementation of a Risk Management Plan were appropriate and performed in accordance with applicable risk management procedures to ensure that nuclear safety was adequately maintained.

The FFT was provided the job order and procedure for the task to be observed – “Calibration of the Unit 1 Air Side Seal Oil Pump Pressure Switch” – and given adequate time to review them. The FFT met Mr. Kenison in the I&C Building and was advised of a delay due to personnel changes to support emergent work at the station. This delay reduced the time allotted to perform the full observation.

The pre-job brief was fully observed with Mr. Kenison and two of his I&C Technicians. The job steps were covered, pictures and drawings were used and referred to, the last maintenance on the pressure switch was reviewed and discussed, and risk was covered. Mr. Kenison challenged the technicians on technical fundamentals, safety, and hazards in the area. The technicians provided good responses and actions they would take to remediate each. Mr. Kenison stated that he verified the technicians’ qualifications for the task and that the clearance was properly hung. The Maintenance team then asked the FFT for questions and took time to answer them.

The FFT observed the technicians walk to the job site in the Unit 1 Turbine Building with their tools, perform a job site setup, and an initial walkdown and flagging of the pressure switch. The technicians pointed out proper walking paths and hazards to the FFT along the way and at the job site. Mr. Kenison performed an observation of the technicians during their setup. The technicians then went to the control room to notify the Unit 1 operators of the start of work, alarms the operators could expect to receive, and who to contact for the job. Due to time constraints, the FFT concluded the in-field portion of the observation.

The FFT followed up with the technicians at the end of the day to observe the post-job brief. One of the technicians was updating the job order paperwork and adding the information about the job to the DCPD I&C internal “operating experience” database. The technician explained that I&C has been keeping electronic notes of key information on equipment they work on so they can refer to it for future jobs. In this case, the pressure switch was found to be out-of-specification and required additional action to calibrate. Documenting this for the future was how they ensure an effective post-job brief.



Ms. Darden, Dr. Scarlat, and
PG&E I&C Technicians at the
Unit 1 Air Side Seal Oil System.

Conclusions: DCPM Maintenance Team adequately prepared for the calibration activity and exhibited good standards and safety practices in the field. Upon conclusion of the job, Maintenance ensured post-job documentation was entered into their internal “operating experience” database, providing a useful tool for the future.

Recommendations to the DCISC or PG&E: None.

3.8 Safety Related Direct Current (DC) Power System Review

The DCISC FFT met with Michael Jackson, Director Nuclear Engineering; Mark Frantz, Manager Nuclear Engineering; and Ryan Buchmann, Electrical Systems Engineer, for an overview of the Safety Related Direct Current (DC) Power System. The DCISC last reviewed the DC System during its April 2019, Fact-Finding Meeting (Reference 6.8), when it concluded the following:

The health of DCP's Direct Current Power Systems was rated as Green, i.e., Healthy. The System Engineer appeared knowledgeable and proactive about his system.

Mr. Buchmann provided an overview of the Safety Related DC Power System, which is a vital system necessary to provide safety related functions and indications during normal operations and during unplanned events. During normal power operations, the DC Power System provides vital information to the control room which is used by the operators to ensure the reactor and its support systems are performing as expected. During an event, such as a reactor trip or loss of offsite power, the DC Power System continues to provide information as well as protection functions for the reactor and its subsystems.

The Safety Related DC Power System is provided by lead/acid batteries that are separated into "trains" designated as Train 11, 12, 13 for Unit 1 and Train 21, 22, 23, for Unit 2. These batteries are normally charged from offsite power or from the Diesel Generators should offsite power be unavailable.

The plant also has non-safety related/non-vital DC Power for non-critical systems which are charged from offsite power provided to the plant. The status of the non-vital DC system is included in the overall System Health Report.

Mr. Buchmann provided the FFT with the 1st quarter 2026 System Health Reports for both Units' DC Power Systems at Diablo Canyon. Both reports reflected a very good status – rated as Green, which is Healthy. The discussion around System Health was informative. While the 1st quarter reports reflected a well-managed system, there was a fair amount of discussion on plans to improve the system and better manage necessary updates and repairs. Part of this conversation reflected the turnaround that the DCP has gone through with a forecasted shutdown in 2024 to a License Renewal until 2034. Nonetheless, the current staffing is appropriate and engaged in continuous improvement of the system. Mr. Buchmann was relatively new in his capacity. DCISC focused the discussion on understanding the reasons behind the different types of surveillance. A healthy attitude towards looking up any information that was not readily known, and discussing as a team to verify correct understanding was observed.

Maintenance schedules for safety related portions of the system were provided to the FFT. The discussion on maintenance was focused mainly on what is done to ensure the DC Power System is operating at its peak performance. Mr. Buchmann talked about battery testing and replacement processes, Technical Specification Surveillances, battery load tests measuring the strength and duration of battery performance, as well as refueling outage refurbishments.

During the NRC License Renewal process, the regulator requested considerable information on safety related electrical equipment and as part of Aging Management, the NRC observed many tests and inspections of electrical equipment. Because of the critical nature of the Safety Related DC Power System, there are planned activities in refueling outages to conduct repetitive maintenance and replacements on each of the DCP Units.

Conclusions: DCP's Safety Related Direct Current Power System is rated Green (Healthy). The System Engineer for the system showed ownership and a healthy attitude towards continuous improvements. Generally, the DCISC Team was appreciative of the professional dialog and behaviors of the participants.

Recommendations to PG&E or DCISC: None.

3.9 Station Update

The DCISC FFT met with Justin Rogers, Station Director, for a station update. The DCISC's last station update was during its December 15, 2025, Fact-Finding Meeting (Reference 6.9), when it concluded the following:

DCP'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 DCP as follows:

- Unit 1 curtailments to perform tunnel cleaning were completed in February 2026 (the tunnel carries Pacific Ocean water from the intake to the turbine building). This required reducing Unit 1 power to 50% and securing one Circulating Water (CW) pump to support the side being cleaned (east or west). Mr. Rogers explained that the power reduction and restoration to 100% was performed well with no issues.
- The Unit 1 tunnel cleaning evolution revealed less biofouling than in the past. Mr. Rogers attributed this to 1) improved health of the chlorine injection system due to the station assigning it a higher priority to improve its reliability and availability, and 2) portions of the tunnel had been painted with a marine paint that resists biofouling. Initial inspections found this paint may improve tunnel biofouling. When asked if this paint had been evaluated in conjunction with the NPDES permit, Mr. Rogers stated it had been evaluated to the current permit, and it was being verified to comply with the new permit. The DCISC did not further explore this.
- There have been no leadership changes since the last station update.

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.

3.10 Unit 1 Steam Generator Degradation Assessment Error Analysis

The DCISC FFT met with Michael Jackson, Director Nuclear Engineering; Sean Dunlap, Secondary Systems Engineering Supervisor; and Mark Frantz, Manager Nuclear Engineering, to

discuss Unit 1 Steam Generator degradation assessment error analysis. The DCISC last reviewed this topic during its December 2, 2025, Fact-Finding Meeting (Reference 6.11), when it concluded the following:

DCPP's Steam Generators were in excellent health, and plans for future Steam Generator inspections were appropriate.

Additionally, the DCISC made the following recommendation during its December 2, 2025, Fact-Finding Meeting:

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

At DCP, 100% of the tubes were last inspected via ECT on Unit 1 during Refueling Outage 1R24 in 2023 and on Unit 2 during Refueling outage 2R21 in 2019. The October 2025 Steam Generator (SG) Degradation Assessment, dated Oct 1, 2025, provides the basis to skip Primary and Secondary Side Maintenance in accordance with Electric Power Research Institute (EPRI) SG Integrity Assessment Guidelines (SGIAGL) Section 11.2.4. Previous inspections found only minor indications of tube degradation, and only a very small number of tubes have been plugged as follows:

Following 1R24 (2023)

SG Number	Tubes Plugged
1-1	1
1-2	5
1-3	2
1-4	0
Total	8

Following 2R21 (2019)

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

During the December 2, 2025, Fact-Finding Meeting, the Steam Generator Tube Support Plate (TSP) Wear and Anti-Vibration Bar (AVB) wear was reviewed and there was a Recommendation that DCISC should review the error analysis for calculations contained in the October 2025 Degradation Assessment for the Unit 2 Steam Generators. The recommendation was inaccurate in that the specifically error analysis desired to be reviewed was in the April 2025 Unit 1 Steam Generator Degradation Assessment report, section 2.3.3, "OA for Tube Wear (TSP Wear and AVB Wear)." Ultimately, the error analysis for both units' evaluations was discussed in this meeting.

The FFT requested a detailed explanation of the error analysis. From the reading of the SG degradation report alone, the DCISC Team was not able to identify which documents to reference for the documentation of the error analysis, though a footnote on the table reporting deterministic end of cycle AVB wear did indicate that reported values included NDE uncertainties. PG&E was able to identify and provide all of the necessary documents for full transparency of the error analysis methodology, including the relevant chapter of the examination guidelines, and relevant examination specification sheets. The DCISC was also provided a document, “Pacific Gas and Electric Diablo Canyon Unit 1 Refueling Outage 1R25 Steam Generator Degradation Assessment,” Revision 0, dated April 2025, which outlined the methodology and conclusions of the Steam Generator wear analysis. The DCISC also was provided a copy of SG-CDMP-23-16, “Diablo Canyon Unit 1 1R24 Condition Monitoring and Operational Assessment,” Revision 0, dated November 2023, developed by Westinghouse. Also available was the “Pacific Gas and Electric Diablo Canyon Unit 2 Refueling Outage 2R25 Steam Generator Degradation Assessment Report,” Revision 0, dated October 2025.

The DCPD Steam Generator Engineers provided a detailed walk through of the methodologies used in both Steam Generator reports. The primary focus of this meeting was on the uncertainty calculation for determining the potential through wall leak of a worst-case Steam Generator Tube location over the course of an eight-year duration as the NRC Guidance recommended. After considerable review, the DCISC and DCPD Engineers arrived at a satisfactory agreement that the uncertainty calculation followed the prescribed methodology and was fully documented.

This specific uncertainty calculation reviewed pertained to the predicted worst-case through-wall tube degradation at the time of the next inspection, which must be compared to the structural limit, accounting for uncertainties. The review of this documentation was a positive example of well-documented decisions for the SG inspection schedule, which is continuously re-evaluated based on the most current inspection results. This illustrates a safety approach that allows for prioritization of effort on activities that can be most impactful for safety, and a culture of continuous improvement and continuous learning from operational experience.

Conclusion: The DCISC reviewed the error analysis with the DCPD Steam Generator (SG) engineers to better understand the conclusions of the SG inspection reports. Based on the third-party reports and assessments, including the April 2025 Unit 1 Steam Generator Degradation Assessment Report and the October 2025 Unit 2 Steam Generator Degradation Assessment Report, the DCPD Unit 1 and Unit 2 Steam Generators appear to be in excellent health. The methodology and analysis of the Steam Generator tube examination results were sufficiently conservative and appropriate.

Recommendations to the DCISC: The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting and should be closed: The DCISC should review the error analysis for calculations contained in the October 2025 Degradation Assessment for the Unit 2 Steam Generators. (D12/2/25FF-3.5)

Recommendations to PG&E: None.

3.11 Meet with Individual Contributors from Various Departments

The DCISC FFT met with John Kline (Planning), Mitch Nunes (Mechanical Maintenance), Ashley Cervantes (Maintenance - I&C), Nico Nani (Operations), and Clinton Cabigas (Operations) for an informal discussion on their experiences working at DCP. The DCISC last met with a group of employees for a general discussion during the December 2, 2025, Fact-Finding Meeting (Reference 6.12), when it concluded the following:

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

The participants discussed the following items:

- The Safety Champions Program
- Safety issue reporting including anonymous Notifications and the Employee Concerns Program
- Examples of a Teaching Culture at DCP
- Expectations for mitigating Risk and Safety
- Support for development of internal departmental Operating Experience (OE) data
- The future of electronic procedures, work orders, and Artificial Intelligence (AI) Tools
- Employee interaction and familiarization with the NRC Resident

The FFT had an enjoyable conversation with five DCP employees who were all individual contributors. When the FFT asked to describe the culture at DCP and what was important, the employees all shared information on safety and the Safety Champions program, describing it as a “grassroots” effort that they all participate in. They shared that it was cross-functional (different departments sharing with each other) and it was supported by leadership. Examples of identifying safety issues and resolving them were provided to the FFT.

When asked about job satisfaction and future opportunities, the employees shared that they all liked what they were currently doing. They appreciated that there was flexibility to try new things for short periods of time and that there was a strong “teaching culture” at DCP. They explained this as leaders and co-workers taking time to show them things to help them learn, and they all shared general experiences of this. This then led to a discussion on the development and use of internal OE. Each department shared that they have created electronic departmental “folders” that have years of job information and is updated diligently. The employees spoke of the importance of this to ensure they and their co-workers, new and experienced, were well prepared for their jobs.

When the FFT asked about electronic procedures, work orders, and AI tools, the employees noted that they have not used them yet but acknowledged that they were going to be used more in the future. They were aware of the AI tool “Neutron” but have used it for their jobs (occasionally in the Planning group) and all of them noted that they have been involved in the development stages of electronic procedures and work orders.

All of the employees were familiar with the Resident NRC Inspectors and had professional and positive interactions with them.

Conclusions: An informal discussion with five DCPD employees was enjoyable and informative and provided insights into the culture of Industrial Safety, employee development, use of internal Operating Experience, and the future use of electronic procedures and Artificial Intelligence.

Recommendations to the DCISC or PG&E: None.

3.12 Preparation for Future Independent Spent Fuel Storage Installation (ISFSI) Inspections in August 2026

The DCISC FFT met with Philippe Soenen, Director Strategic Initiatives, Performance Improvement, and Organizational Effectiveness; Eric Brackeen, Manager Decommissioning Projects, and Kyle Duke, System Engineer for the ISFSI, for an update on the upcoming inspections of the Independent Spent Fuel Storage Installation (ISFSI) canisters this summer. The DCISC last reviewed this topic during its December 15, 2025, Fact-Finding Meeting (Reference 6.13), when it provided the following recommendation:

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)

Messrs. Soenen, Brackeen, and Duke started the discussion with a quick history of the ISFSI Multi-Purpose Canister (MPC) installation and inspections. They noted that the ISFSI at Diablo Canyon is licensed under a Site-Specific License from the USNRC and Holtec is the original equipment manufacturer (OEM) of the canisters and overpack shielding design. Most plants in the US receive a General License for their Nuclear Power Plants ISFSI. The main reason that the DCPD ISFSI is under a Site-Specific License is the enhanced Seismic acceleration expected for the Diablo Canyon location. In this case, Holtec was required to design and install tie downs from the external Overpack shielding to the ISFSI concrete base to anchor the canisters and overpack resulting in a robust seismic design.

Also, the previous canister inspection campaign performed in June 2021, was conducted for the NRC to support the License Renewal Aging Management Program (AMP) as part of the License Renewal process which ensures that the ISFSI is in good condition for the next 40 years of potential operation of the ISFSI. The canister condition monitoring inspections were performed on eight canisters as part of License Renewal aging analysis. The canisters that were selected represented several canister material differences and different environmental conditions at the ISFSI site. The Site-Specific License requires an inspection of two or more canisters every five years.

Mr. Brackeen informed the FFT that the inspections are scheduled to be done during the week of August 17, 2026, and will be the first five-year inspection performed as part of the Site-Specific License Requirements. DCPD personnel expect eight canisters will be inspected in this campaign.

The canister inspection process consists of removing access location covers at the top of the overpack. Through these access points, an inspection camera enters the gap between the interior of the overpack and the exterior of the canister and records the condition of the canister exterior. An inspection camera is used for a VT-3 examination of surface conditions. The VT-3 examination is a non-destructive visual examination (VT) method, particularly used in nuclear applications, to assess the general mechanical and structural integrity of components, supports, and piping. It detects degradation like corrosion, wear, erosion, loose parts, and misalignment, often requiring specialized tools like borescopes or robotic systems for remote inspection. During the previous canister inspections, no major structural or unusual configurations were found. However, the inspections noted canisters that had small amounts of minor discoloration spots with no observed degradation.

The DCISC Team discussed the possibility for a FFT to access the ISFSI and the canister area during the inspections. Mr. Duke indicated that each canister to be inspected will require additional security requirements for access and will include a separate secure radiation zone area around the canister being inspected. This is due in part to the close proximity and breaching of the overpack to inspect the canister being inspected. He stated that they expect that access for DCISC to perform observations of the inspections would be possible.

Mr. Duke shared that during the upcoming inspection, DCPD plans to use a more sophisticated inspection probe that has enhanced visual measurement capability with the intention of further examining the previously identified discoloration spots. The improved examination equipment has updated measurement capabilities that will assist in recording any abnormalities. Mr. Brackeen noted that they were also working with the vendor on developing inspection tools that can take samples of and clean any areas exhibiting residue. The contract with the vendor providing the MPC Inspections was in final negotiations at this time of this Fact-Finding Meeting.

Conclusion: The Independent Spent Fuel Storage Installation (ISFSI) inspection team provided DCISC information on the details regarding the procedures, equipment, training, and contract for the upcoming August 2026 inspection campaign. The DCISC concluded that the readiness of the ISFSI Inspection Team was on track.

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

Recommendations to PG&E: None.

4.0 CONCLUSIONS

- 4.1 The Plant Health Subcommittee (PHSC) meeting was conducted efficiently, and attendee participation was strong which added to the effectiveness of the meeting.**
- 4.2 The meeting with the NRC Resident Inspector was beneficial, and the DCISC should continue the meetings.**
- 4.3 Based on its reviews of DCP's FLEX Procedures, Equipment, and Training, the DCISC concluded that the readiness of the FLEX tools for the propping-open of doors is appropriate. Based on its review of the building layout, it concluded that it is possible to ensure water flow from the Component Cooling Water Heat Exchanger to the outside of the building with the propping open only of doors that open outwards, and the FLEX equipment available was appropriate for achieving this. The staff embraced preparedness for identifying alternate methods to maintain control of the power plant during Beyond Design Basis events. DCISC will periodically review the FLEX Program in future Fact-Finding Meetings.**
- 4.4 The DCISC reviewed how the Technical Specification-required Completion Time was met for an October 2025 Emergency Diesel Generator 2-2 Jacket Water Pump leak event as well as how a similar event would be handled in the future using Risk-Informed Completion Time and found use of the Completion Times to be appropriate.**
- 4.5 DCP's implementation, staffing and training plans for the new National Pollution Discharge Elimination System (NPDES) and Clean Water Act 401 Water Quality Certification were reviewed and are on track for meeting the compliance date of April 17, 2026. DCISC will periodically review the Chemistry Program in future Fact-Finding Meetings.**
- 4.6 The regular meetings with DCP Officers and Directors continue to be beneficial for both organizations.**
- 4.7 DCP Maintenance Team adequately prepared for the calibration activity and exhibited good standards and safety practices in the field. Upon conclusion of the job, Maintenance ensured post-job documentation was entered into their internal "operating experience" database, providing a useful tool for the future.**
- 4.8 DCP's Safety Related Direct Current Power System is rated Green (Healthy). The System Engineer for the system showed ownership and a healthy attitude towards continuous improvements. Generally, the DCISC Team was appreciative of the professional dialog and behaviors of the participants.**
- 4.9 DCP's update on recent station activities was informative, and no new major issues were identified.**

- 4.10 The DCISC reviewed the error analysis with the DCPD Steam Generator (SG) engineers to better understand the conclusions of the SG inspection reports. Based on the third-party reports and assessments, including the April 2025 Unit 1 Steam Generator Degradation Assessment Report and the October 2025 Unit 2 Steam Generator Degradation Assessment Report, the DCPD Unit 1 and Unit 2 Steam Generators appear to be in excellent health. The methodology and analysis of the Steam Generator tube examination results were sufficiently conservative and appropriate.
- 4.11 An informal discussion with five DCPD employees was enjoyable and informative and provided insights into the culture of Industrial Safety, employee development, use of internal Operating Experience, and the future use of electronic procedures and Artificial Intelligence.
- 4.12 The Independent Spent Fuel Storage Installation (ISFSI) inspection team provided DCISC information on the details regarding the procedures, equipment, training, and contract for the upcoming August 2026 inspection campaign. The DCISC concluded that the readiness of the ISFSI Inspection Team was on track.

5.0 RECOMMENDATIONS

Recommendations to the DCISC:

- 5.1 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.3) and should be closed: *The DCISC should review FLEX Support Guidelines for how doors can be propped open, should this action be needed in a severe accident scenario. The propping open of doors can be a useful tool in responding to an unforeseen scenario, and the plant would be well positioned to have tools and training for how operators can effectively achieve the propping open of doors. (D12/2/25FF-3.8)*
- 5.2 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.4) and should be closed: *As a case study for Risk-Informed Completion Time, the DCISC should further review how the Technical Specification-required Completion Time was met for an October 2025 Emergency Diesel Generator 2-2 Jacket Water Pump leak event as well as how a similar event would be handled in the future following approval of the License Amendment Request and implementation of a risk-informed Completion Time. (D12/2/25FF-3.1)*
- 5.3 The DCISC should review the workflow of interfacing with the NRC Resident Inspector for a hypothetical scenario when a Notification mentions the need for a Compensatory Action but is later identified that the system was in fact operable and did not require a Compensatory Action. (D3/26FF-3.4)
- 5.4 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.5) and should be closed: *The DCISC should follow up on*

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

- 5.5 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.10) and should be closed: *The DCISC should review the error analysis for calculations contained in the October 2025 Degradation Assessment for the Unit 2 Steam Generators. (D12/2/25FF-3.5)*
- 5.6 The following previous recommendation to the DCISC was reviewed in this Fact-Finding Meeting (Section 3.12) and remains open: *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).*

Recommendations to PG&E: None.

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.2, Section 3.8, “Observe Plant Health Committee Meeting.”
- 6.2 Ibid., Exhibit D.6, Section 3.12, “Meet with Nuclear Regulatory Commission (NRC) Resident Inspectors.”
- 6.3 Ibid., Exhibit D.4, Section 3.8, “Auxiliary Saltwater System Discharge Arrangement and FLEX Program.”
- 6.4 Ibid., Section 3.1, “Emergency Diesel Generator Mission Times and Operability Determination.”
- 6.5 Ibid., Section 3.11, “Chemistry Program.”
- 6.6 Ibid., Exhibit D.6, Section 3.8, “Meet with DCPD Officers.”
- 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.9, Section 3.3, “Observe Outage Maintenance Activity.”

- 6.8 “Diablo Canyon Independent Safety Committee Twenty-Ninth Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2018 – June 30, 2019”, Approved October 23, 2019, Volume II, Exhibit D.8, Section 3.9, “Direct Current Power System.”
- 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.5, Section 3.14, “Station Update.”
- 6.10 “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 3.5, “Steam Generator Health.”
- 6.11 Ibid., Exhibit D.4, Section 3.6, “Meet with Licensed and Non-Licensed Operators.”
- 6.12 Ibid., Exhibit D.5, Section 3.11, “Spent Fuel Canister Corrosion Update.”