

DIABLO CANYON
INDEPENDENT SAFETY COMMITTEE
(www.dcisc.org)

Committee Members: Robert J. Budnitz
Peter Lam
Per F. Peterson

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Wednesday & Thursday
June 23-24, 2021
Avila Lighthouse Suites

Point San Luis Conference Room
First & San Francisco Streets
Avila Beach, California

PUBLIC MEETING AGENDA

This public meeting will be webcast in real time at:
http://www.slo-span.org/local_webcast/DCISC/stream_index.htm and through <http://www.dcisc.org>.

FACE COVERINGS ARE REQUIRED OF ALL ATTENDEES

This meeting is also being produced as a Zoom webinar by AGP Video Inc. and is webcast live on SLO-SPAN at <http://www.slo-span.org> and through <http://www.dcisc.org> and will be broadcast subsequently on San Luis Obispo local government access television, Channel 21.

Zoom Webinar Meeting ID: 819 8391 6513

Zoom Webinar Meeting Passcode: 558340

<https://us02web.zoom.us/j/81983916513?pwd=cVZqZXhxdStyNjNlbnk4U1hpSVpqZz09>

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1(669) 900-6833; 1(408) 638-0968; 1(346) 248-7799; 1(253) 215-8782;

1(301) 715-8592; 1(312) 626-6799; 1(646) 876-9923

WEBINAR PARTICIPATION

In lieu of attending in person you may participate in the DCISC's public meeting in real-time by accessing the Zoom webinar meeting via the weblink and the meeting ID and Passcode given above or by calling any of the phone number provided above. Instructions on how to access, view and participate in remote meetings are also provided by visiting the DCISC's home page at <http://www.dcisc.org>. Attendees can make oral comments or ask questions of the Committee Members during the webinar meeting by using the "Raise Your Hand" feature or by pressing *9 on your telephone keypad if joining by telephone only. If you are unable to participate in real-time, you may email to dcsafety@dcisc.org with the subject line "Public Comment Item# ____" (insert the item number relevant to your comment) or "Public Comment – Non Agenda Item." Comments will be reviewed and distributed before the meeting if received by 5:00 p.m. on Tuesday, June 22, 2021. Comments received after that will be addressed during the item and/or at the end of the meeting. All comments received will be read into and become part of the record, subject to a time limit determined by the presiding officer. The Committee will have the option to modify its actions on items based on comments received.

Morning Session - 06/23/2021 – 9:00 A.M.

I CALL TO ORDER - ROLL CALL

II INTRODUCTIONS

ADVISEMENT

The Committee may consider at any time requests to change the order of a listed agenda item. Information distributed to the Committee at a public meeting becomes part of the public record of the DCISC. A copy of written material, pictures, etc. must be provided to the Committee's Legal Counsel for this purpose. Correspondence received and sent by the Committee is on file with the Office of the DCISC Legal Counsel and copies are available upon request. Devices for attendees who may be hearing impaired are available upon request. The meeting will be webcast in real time.

III PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. The public may comment on any matter listed on the Agenda immediately following the time the matter is considered by the Committee. *There will be a time limit for each speaker as designated by the presiding officer. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

IV ACCEPTANCE OF MINUTES

- A. Minutes of February 16-17, 2021, Public Meeting. Accept

V ACTION ITEMS

- A. Update on Financial Matters and Committee Activities during 2021. Discussion/Action
B. Discussion of Open Items List. Discussion/Action
C. Nomination and Election of Chair and Vice-Chair for the July 1, 2021 - June 30, 2022 Term. Discussion/Action

VI COMMITTEE MEMBER REPORTS AND DISCUSSION

- A. Public Outreach, Site Visits and Other Committee Activities; Scheduling and Confirmation of Future Fact-Finding Visits and Public Meetings.
B. Documents Provided to the Committee.

VII STAFF & CONSULTANT REPORTS & RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT-FINDING REPORT TO PG&E

- A. Consultant R. Ferman Wardell.:
Fact-finding Topics; Report on and Approval of March 17-18, 2021 Fact Finding Report.
B. Assistant Legal Counsel Robert W. Rathie:
Administrative, Regulatory and Legal Matters.

VIII ADJOURN MORNING MEETING

Afternoon Session – 06/23/2021 – 1:30 P.M.

IX RECONVENE FOR AFTERNOON MEETING

X COMMITTEE MEMBER COMMENTS

XI PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. The public may comment on any matter listed on the Agenda immediately following the time the matter is considered by the Committee. *There will be a time limit for each speaker as designated by the presiding officer. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

XII INFORMATION ITEMS BEFORE THE COMMITTEE

- B. Informational Presentations Requested by the Committee of PG&E:
 - 1) Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspections Reports and Notices of Violation, Issues Raised by NRC Resident Inspectors, Open Compliance Issues, Current and Future License Amendment Requests, cross-cutting aspects of performance, and Other Significant Regulatory Issues/Requests.
 - 2) Update on Emergency Preparedness During Decommissioning.

XIII TECHNICAL CONSULTANT REPORT & RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT-FINDING REPORT TO PG&E (Cont'd.)

- C. Richard McWhorter:
Fact-finding Topics; Report on and Approval of the April 27-28, 2021 Fact Finding Report.
- D. Consultant R. Ferman Wardell.:
Fact-finding Topics; Report on and Approval of May 18-19, 2021 Fact Finding Report

XIV ADJOURN AFTERNOON MEETING

Evening Session – 06/23/2021 – 5:30 P.M.

XV RECONVENE FOR EVENING MEETING

XVI COMMITTEE MEMBER COMMENTS

XVII PUBLIC COMMENTS AND COMMUNICATIONS

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XVIII INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

- C. Informational Presentations Requested by the Committee of PG&E:
 - 3) Update on Unit 2 Main Generator Outages and Repairs.
 - 4) Presentation on the State of the Plant: including Key Events, Outages, Highlights, Organizational Changes, COVID-19 Pandemic Response and other Station Activities since February 2021.

XIX ADJOURN EVENING MEETING

Morning Session – 06/24/2021 – 8:30 A.M.

XX RECONVENE FOR MORNING MEETING

XXI COMMITTEE MEMBER COMMENTS

XXII PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. The public may comment on any matter listed on the Agenda immediately following the time the matter is considered by the Committee. *There will be a time limit for each speaker as designated by the presiding officer. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

XXIII PRESENTATION TO THE COMMITTEE

A. Informational Presentation Requested by the Committee:

- 1) Remarks by the NRC Senior Resident Inspector for Diablo Canyon Power Plant

XXIV INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

D. Informational Presentations Requested by the Committee of PG&E:

- 5) Update on the Efforts to Retain Qualified Staff Including Those with Critical Skills (Such as Licensed Operators, Senior Maintenance Technicians, Etc.)
- 6) Update on Performance Improvement Programs.
- 7) Station Excellence Plan and Station Oversight Committee.

XXV ADJOURN MORNING MEETING

Afternoon Session - 06/24/2021 - 1:00 P.M.

XXVI RECONVENE FOR AFTERNOON MEETING

XXVII COMMITTEE MEMBER COMMENTS

XXVIII PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. The public may comment on any matter listed on the Agenda immediately following the time the matter is considered by the Committee. *There will be a time limit for each speaker as designated by the presiding officer. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

XXIX INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

E. Informational Presentations Requested by the Committee of PG&E:

- 8) Performance During 22nd Refueling Outage for Unit 2 including Key Activities, Main Generator Repairs and Modifications, Performance Indicators, Results Achieved, Unexpected Equipment Issues, and Open Items.
- 9) Quality Verification's Perspective on Plant Performance, Top Issues, Quality Performance Assessment Report.

XXX CONCLUDING REMARKS & DISCUSSION BY COMMITTEE MEMBERS OF FUTURE DCISC ACTIVITIES

- A. Future Actions by the Committee.
- B. Further Information to Obtain/Review.
- C. Confirmation of Future Site Visits, and Public Meetings.

XXXI ADJOURNMENT OF NINETY-NINTH PUBLIC MEETING

The DCISC's policy is to schedule its public meetings in locations that are accessible to people with disabilities and to remain in compliance with federal, state and local guidelines on COVID-19 prevention. The Avila Lighthouse Suites Point San Luis Conference Facility is a wheelchair accessible facility. All persons in attendance at the meeting will be required to wear face masks and social distancing protocols will be in place. A person who needs a disability-related accommodation or modification in order to participate in the meeting may make a request by contacting the DCISC office at (800) 439-4688 or by sending a written request to the DCISC office at 857 Cass Street, Ste. D., Monterey, CA 93940. Providing your request at least five business days before the meeting will help ensure availability of the requested accommodation.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	June 23, 2021
AGENDA ITEM:	IV-A
AGENDA TITLE:	Minutes of February 16-17, 2021 Public Meeting

CONSENT [X] ACTION [] INFORMATION []

Staff Summary: Attached are the Minutes which have been prepared from the Committee's ninety-eighth public meeting held on February 16-17, 2021, as a Zoom webinar.

(Each session was also webcast live in real time and is available for subsequent viewing, archived to the meeting agenda, by visiting the links on the Committee's website at www.disc.org or at www.slospan.org. Meetings are videotaped for later broadcast on Channel 21 in the San Luis Obispo, CA area, the governmental access television channel.)

RECOMMENDED COMMITTEE ACTION: Accept the Minutes by motion

AGENDA PACKET DRAFT - JUNE 9, 2021

**MINUTES
of the
DIABLO CANYON INDEPENDENT SAFETY COMMITTEE'S
FEBRUARY 16-17, 2021, PUBLIC MEETING
[For approval at the June 23-24, 2021, Public Meeting.]**

Tuesday & Wednesday
February 16-17, 2021
Conducted as a Zoom Webinar

In response to Governor Newsom's Executive Order N.29-20 related to the COVID-19 (coronavirus) pandemic public participation in this DCISC public meeting was by electronic means only and without a physical location for public participation in compliance with California state guidelines on social distancing. This meeting was produced as a webinar by AGP Video Inc. and webcast live on SLO-SPAN at <http://www.slo-span.org> and through <http://www.dcisc.org> and was subsequently broadcast on San Luis Obispo local government access television Channel 21.

Notice of Meeting.

A legal notice of the public meeting and several display advertisements were published in local newspapers and mailed to the media and those persons on the Committee's service list. The meeting agenda and the entire agenda packet for the meeting together with the informational presentations made during the meeting were posted on the Committee's website at www.dcisc.org prior to the meeting and the meeting agenda contained information on how to access the webinar using a computer or a telephone.

I CALL TO ORDER - ROLL CALL

The February 16, 2021, public meeting of the Diablo Canyon Independent Safety Committee (DCISC), the ninety-eighth public meeting of the Committee, was called to order by Committee Chair Dr. Peter Lam at 9:00 A.M. Dr. Lam briefly reviewed the professional backgrounds and appointment to the DCISC for each of his fellow DCISC Members, Dr. Robert J. Budnitz, the appointee of the California Attorney General, and Dr. Per F. Peterson, the appointee of the Governor of California, and Dr. Lam introduced himself as the appointee of the California Energy Commission and current serving DCISC Chair. Dr. Budnitz then briefly reviewed Dr. Lam's professional background.

Present:	Committee Member Robert J. Budnitz Committee Member Peter Lam Committee Member Per F. Peterson
Absent:	None

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II INTRODUCTIONS

Dr. Lam introduced the Committee's Technical Consultants Mr. Richard D. McWhorter Jr. and Mr. R. Ferman Wardell and DCISC Assistant Legal Counsel Robert W. Rathie. Dr. Lam then introduced Mr. Thomas R. Baldwin, P.E., Pacific Gas & Electric (PG&E) Director of Generation Business Planning and Mr. Hector Garcia, Diablo Canyon Power Plant (DCPP) Chief Nuclear Officer Support Manager. Mr. Baldwin and Mr. Garcia play key roles on behalf of PG&E in working with the DCISC in coordinating activities, providing information, and facilitating its public meetings and the frequent fact-finding visits to DCPP conducted by a single member and one of the technical consultants.

III PUBLIC COMMENTS AND COMMUNICATIONS

The Chair invited any members of the public present who wished to address remarks to the Committee on items not appearing on the agenda for the public meeting to do so at this time by using the Zoom webinar's "raise your hand" feature. There were no comments from members of the public at this time.

IV ACCEPTANCE OF MINUTES

The item concerned review and acceptance of the Minutes of the Committee's October 22-23, 2020 public meeting conducted as a Zoom Webinar. A draft of the October 2020 Minutes was included in the public agenda packet for this meeting. The Members and Consultants reviewed the Minutes and provided corrections and substantive changes to certain references which will be included in the final version of the October 2020 Minutes. The Members and Technical Consultants discussed some of the follow-up actions to be taken, provided clarification concerning typographical errors and the accuracy of certain references in the Minutes and made editorial comments and changes concerning the draft of the October 2020 Minutes.

The Minutes of the Committee's public meetings in their final accepted form become part of its Annual Reports on Safety of Diablo Canyon Nuclear Power Plant Operations (Annual Report). Upon a motion made by Dr. Budnitz, seconded by Dr. Peterson, the Minutes of the Committee's October 2020 public meeting were accepted subject to inclusion of the changes provided to the Committee's Assistant Legal Counsel. The October 2020 Minutes will become a part of the Committee's 31st Annual Report.

V ACTION ITEMS

A. Receive PG&E's Response to DCISC's 30th Annual Report on Safety of Diablo Canyon Operations; July 1, 2019 - June 30, 2020. Mr. Rathie reported that upon its approval at a public meeting the DCISC's annual reports are required to be provided to PG&E for a response and PG&E then has up to 45 days to provide its response which becomes a part of each annual report. PG&E is required to respond substantively to any recommendation made by the DCISC in an annual report and for the 30th Annual Report the Committee made one recommendation relative to DCPP's safe operation as follows:

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“Recommendation:

The DCISC recommends that when PG&E considers decisions about the future management on-site of the spent fuel from DCCP’s two reactor units, the risks arising from spent fuel management should be one part of the PG&E decision process and that process should be informed by the conclusions contained in the Study entitled “Probabilistic Risk Assessment of Nuclear Power Plant Spent Fuel Handling and Storage Programs: Methodology and Application to the Diablo Canyon Power Plant.” (4.19.3)”

In his letter of December 7, 2020, PG&E Senior Vice President Generation and Chief Nuclear Officer Mr. James Welsch responded to the DCISC’s Recommendation as follows:

“We agree with the recommendation and will incorporate it into our decision process on spent fuel management at the plant.”

Dr. Budnitz stated he was very pleased to see that PG&E accepted the strengths and validity of the Study. Dr. Budnitz reported that one of the two principal authors of the Risk Assessment Study, Dr. B. John Garrick, very recently passed away and Dr. Budnitz observed that Dr. Garrick’s passing is a great loss to the community of safety analysts.

There being no public comment, on a motion made by Dr. Budnitz seconded by Dr. Peterson, the Committee unanimously accepted PG&E’s Response to its Thirtieth Annual Report on the Safety of Diablo Canyon Operations for the period July 1, 2019 - June 30, 2020.

The DCISC Annual Reports are made available in two bound volumes, as a compact disk, on a USB thumb drive and online on the Committee’s website at www.dcisc.org. The reports are made available to the public and sent to the California Public Utilities Commission (CPUC) and the entities appointing members of the DCISC and to other interested parties and provided for inclusion in the collections of the Cal Poly Library and local libraries in San Luis Obispo County.

B. Update on Financial Matters and Committee Activities.

Mr. Rathie reported that once again the Committee has concluded its financial year with a surplus of the funds provided by the PG&E ratepayers for the Committee’s operation. He reported for calendar year 2020 due to savings realized by conducting fact findings and public meetings remotely due to the restrictions imposed by COVID-19 pandemic the Committee will be remitting approximately 35% of the funding received during 2020 to the ratepayers. Mr. Rathie stated that accordingly it would be appropriate for a motion to direct that any funds received which were not expended during 2020 be returned to PG&E for credit to its ratepayers. He reported that the Committee has commenced drawing down the funds provided for its operation in 2021. Dr. Lam remarked the Committee has a duty and obligation to impose budgetary discipline and in his view the Committee has been exceptionally sensitive to its fiduciary responsibility which is shown by the Committee having returned funds for credit to the ratepayers for several successive years. Dr.

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Peterson observed that while the DCISC strives to be fiscally responsible it is important for the Committee to resume its on-site visits to DCPD and its public meetings in the San Luis Obispo area as soon as practicable given the present pandemic as these activities add substantial value to the Committee's work. Dr. Budnitz agreed and observed that the Committee's remote visits and meetings have in his view, been less than 100% effective and they represent a compromise in the Committee's ability to receive information that should not continue forever. Dr. Peterson stated it will be important to discuss later during this public meeting the Committee's plans for transitioning from remote to in-person activities. The Members discussed and confirmed that in the event an emergent issue was required the expenditure of funds in excess of the amount remaining during a calendar year the Committee's practice and preference would be to not curtail or terminate its investigation into the issue and to make up any resulting deficit from the funding provided for the following year.

Upon a motion made by Dr. Budnitz, seconded by Dr. Peterson, the DCISC unanimously accepted the financial report by Mr. Rathie for calendar year 2020 and authorized the return to the ratepayers of any funds remaining unexpended for that year.

Mr. Rathie directed the attention of the Committee to the section of the public agenda packet, made available on the Committee's website for this public meeting, to the list of fact findings and public meetings, along with key dates prepared by Consultant Wardell.

C. Discussion of Issues on Open Items List.

Dr. Lam requested Consultant Wardell lead a review of items on the Open Items List, which he described as a very important tool used by the Committee to track and also to follow issues, concerns, and information requests identified for subsequent action or receipt during fact-finding and public meetings. Dr. Peterson commented the Open Items List identifies items for continued or periodic review, adds new items and, in order for the Committee to accomplish its work within budgetary constraints, items are removed from the Open Items List. Dr. Lam remarked the Open Items List focuses attention on items that are most important for safety and allows the Committee to adjust the resources it devotes to different topical areas. Mr. Wardell stated newly added or changed items were shown in *red italics* on the version of the Open Items List included with the agenda packet and certain items are being identified for closure.

Items discussed or concerning which action was taken included the following¹:

<u>Item</u>	<u>Re:</u>	<u>Action Taken</u>
CO-13	CAISO Load Following Policy	Next Action As Necessary
RA-6	Seismic Fragility Analysis	Close & Merge with SC-3
SE-50	Maintenance Rule Functional Failures (SE-42 merged with SE-50)	Next Action 3/21 or 4/21 FF

¹ Key to abbreviations used: California Independent System Operator (CAISO), Fact-finding (FF), Public Meeting (PM), Quarter (Q), Root Cause Evaluation (RCE).

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SG-1	Steam Generator Inspections & Tests	Next Action As Needed (Delete ref. to 1R21 & 2R21)
SEC-4	Cybersecurity	Next Action 9/21 FF (Pending results of NRC inspection)
SC-3	Long Term Seismic Program (Review Seismic PRA in context of LTSP; strike ref. to prior reviews)	Include RA-6; Next Action 3Q21
BDB	Beyond Design Event Basis Category	Delete as a category
10/20PM-3	Drone Activity	Close
10/20PM-12	Forced Outages Generator Hydrogen Leak	Next Action 6/21 PM. (Pending completion of RCE)

Items identified on the list and not included in the above were identified by Mr. Wardell for closure and were so approved. In response to Dr. Lam's inquiry, Mr. Wardell reported the number of items closed and added to the Open Items List remains fairly stable with the number of open items possibly showing a slight decline. Mr. McWhorter stated that when an item is added to the list it is usually addressed at fact-finding which is conducted before the next public meeting and therefore items on the Open Items List are being closed earlier. Mr. Wardell then called the Committee's attention to Page 9 of the Open Items List which tracks the dates on which system and component reviews were completed or are scheduled. Items identified for review were adjusted as follows:

DCPP Systems/Components Periodic Review

<u>System or Component</u>	<u>Date</u>
Auxiliary Feedwater System	No Change - Defer Next Action
Boric Acid Corrosion Control Program	No Change - Defer Next Action
Long-term Capital Planning	Change Last Reviewed Date to September 2020

Following review of the Open Items List, Mr. Tom Marré was recognized. Mr. Marré remarked that the issue of the hydrogen leak has been cropping up for several months and he finds the matter of a hydrogen leak to be frightening. He closed his remarks by observing the Committee is doing a fantastic job. Mr. Wardell responded that the possibility of a fire as a result of the Unit 2 Main Generator hydrogen leak was discussed by DCP's Station Director Mr. Cary Harbor during the DCISC's October 2020 public meeting and he commended page B.3-5 of the meeting Minutes, available online on the Committee's website as part of the agenda packet for this public meeting, to Mr. Marré's attention. Dr. Peterson observed the hydrogen leakage is associated with the cooling water lines and a pressure differential causes hydrogen to leak into the cooling water system where it is detected.

A short break followed consideration of the Open Items List. Following the break. Mr. Rathie reported on a change to the order of the agenda for the afternoon session with the presentation on the State of the Plant, including the Unit 2 forced outages to address Main

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Generator issues to be presented as the third informational presentation followed by a report on the January 2021 fact-finding by Consultant McWhorter and Dr. Lam.

VI COMMITTEE MEMBER REPORTS AND DISCUSSION

A. Public Outreach, Site Visits and Other Committee Activities:

The Members confirmed public meetings of the DCISC for June 23-24 and October 19-20, 2021 and February 15-16, 2022, and the Members and Consultants then scheduled a public meeting for June 22-23, 2022, tentatively with a public tour of the power plant. Mr. Garcia stated he would check and subsequently confirm that DCPD could support a public meeting of the DCISC on June 22-23, 2022. Mr. Garcia confirmed refueling outage 1R23 is scheduled to commence on March 27, 2022, and conclude on May 5 or 6, 2022. He confirmed that 2022 will see two refueling outages occur at DCPD with Unit 2 also refueling in the fall. Mr. Garcia reported refueling outage 2R22 is scheduled from mid-March to the end of April 2021.

Fact-finding visits were confirmed and scheduled as follows:²

[2021] March 17-18 RJB/RFW; April 20-21 PL/RDM; May 11-12 PFP/RFW; July 14-15 PFP/RDM; August 18-19 PL/RFW; September 13-14 RJB/RDM; November 9-10 RJB/RFW; December 7-8, PFP/RDM; and

[2022] January 11-12 PL/RFW; March 8-9 RJB/RDM; April 12-13 PFP/RFW (during 1R23); May 10-11 PL/RDM.

Mr. Garcia stated he would review the dates of the fact findings set and changed during this public meeting and confirm that DCPD can support fact-finding by the DCISC on those dates.

The Committee Members and Consultants discussed observing the next Evaluated Emergency Exercise scheduled to be held on September 15, 2021, which is the first day of the Yom Kippur high holy days for those of the Jewish faith. Dr. Budnitz commented he was bothered and disappointed by the scheduling of an important exercise on a day of such important religious significance. He remarked that with Consultant McWhorter he is scheduled to conduct a fact finding on September 13-14, 2021, but it is impossible for him to extend the fact finding to include observation of the emergency exercise. **The Committee then tentatively planned to have Consultant McWhorter stay over for the date of September 15, 2021, to observe the Evaluated Emergency Exercise to be possibly accompanied by Dr. Peterson.**

Mr. Rathie reported a determination on when the Committee might again hold its public meetings in-person in San Luis Obispo County is dependent upon changes to the Executive Orders issued by Governor Newsom in response to the COVID-19 pandemic which now mandates meetings of state bodies may be conducted remotely while state and local governments

² Robert J. Budnitz (RJB), Peter Lam (PL), Richard D. McWhorter Jr. (RDM), Per F. Peterson (PFP), R. Ferman Wardell (RFW).

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continue to impose requirements for social distancing in accordance with COVID-19 protection protocols. The Committee has contracts with the Avila Lighthouse Suites for public meetings in Avila Beach for the June 2021 meeting and contracts in progress for the October 2021 and the February and June 2022 dates. Member discussed the contingencies which will govern whether the June 2021 public meeting will be held in Avila Beach or remotely as a Zoom webinar and tentatively planned that the June meeting would be conducted remotely with a priority placed upon resuming in-person fact-finding at DCP.

B. Documents Provided to the Committee:

The Chair observed that a list of documents received by the DCISC since its last public meeting in October 2020 was included in the public agenda packet for this meeting. Dr. Lam remarked the Committee strives to always conduct its business in a transparent manner.

VII STAFF-CONSULTANT REPORTS & RECEIVE, APPROVE, AND AUTHORIZE TRANSMITTAL OF FACT FINDING REPORTS TO PG&E

The Chair requested Consultant McWhorter to report on the November 10-12 and 19, 2020, fact-finding visit with Dr. Budnitz conducted as a Webex webinar. Mr. McWhorter then reviewed the topics discussed with PG&E during the November 10-12 and 19, 2020, visit as follows:

➤ Attend Outage Planning Meetings - Mr. McWhorter reported the DCISC representatives observed an Outage Coordination meeting and a 1100 [hour] Schedule Review meeting related to outage activities during the Unit 1 refueling outage (1R22) and the Unit 2 forced outage (2Z22). The Outage Coordination meeting included review of general work activities, coordination between departments and clearances. The 1100 Schedule Review meeting included a specific review of the waterfall-type schedule prepared to detail all outage work activities. Mr. McWhorter reported both meetings had well-organized agendas and were effective in accomplishing their respective purposes.

➤ Attend Corrective Action Review Board (CARB) Meeting - the Fact-Finding Team observed a meeting of the CARB during which senior management conduct oversight of the corrective action system in general and the Corrective Action Program through review of cause evaluations, extensions of time for resolution of items in the Corrective Action Program, Corrective Action Program statistics and specific items identified for review. For this meeting corrective actions were reviewed involving heat stress experienced by personnel inside Containment during the refueling outage due to the use of anti-contamination clothing in conjunction with their use of face coverings to provide protection from COVID-19. Mr. McWhorter reported the use of face coverings resulted in the face coverings becoming wet with perspiration making it difficult to breath. Corrective action included providing guidance on heat stress relief and the establishment of safe zones to allow personnel to step away, remain socially distanced and remove their face coverings for short periods of time as well as communicating the hazard to other employees. Mr. McWhorter reported these actions appeared effective and no further incidents of heat stress within Containment were reported to the DCISC.

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- Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector – The DCISC Fact-Finding Team met with Mr. Donald Krause, recently appointed to the position of NRC Senior Resident Inspector at DCP. Mr. McWhorter reported Mr. Krause background includes experience both nuclear operations as well as with decommissioning. The DCISC representatives discussed topics related to outage performance with Mr. Krause.
- Unit 2 Forced Outage – Forced outage 2Z22 was in progress for Unit 2 with the unit shut down for a second time due to a hydrogen leak inside the Main Generator. The forced outage overlapped with the scheduled refueling outage of Unit 1 (1R22) and Mr. McWhorter reported it is unusual that both units would be shut down at the same time. He reported this resulted in an increase in workload and an increase in the number of personnel brought on site for the work and he reported the DCISC team found the work was well-managed with routine schedules maintained for the refueling of Unit 1. Unit 1 was successfully restarted while Unit 2 remained shut down and Unit 2 was able to split the steam supply for Unit 1 startup. Mr. McWhorter reported 2Z22 began on October 15, 2020, due to a similar hydrogen leak to that experienced in July 2020 (2Y22). During 2Z22 a leak was found in a different location on the same ring header that experienced a previous leak and several small, cracked welds inside the generator were identified all of which were non-structural, that is, the cracked welds were not on the generator's main frame. Mr. McWhorter reported the root cause evaluation (RCE) for the hydrogen leak has been expanded and at the time of the fact finding the RCE was still open. Four independent consultants have been retained to oversee the RCE process, to assess vibration issue, to review the generator failure and to bring historical knowledge of similar generator failures within the nuclear industry. Testing involving different scenarios for the failure was conducted and it was determined the failure was due to vibration, as the weld failures were caused by fatigue cracking which is indicative of high cycle failure from vibration. Mr. McWhorter reported frame-to-floor weight loading checks on all corners of the Unit 2 Main Generator were performed and some corrections were made and vibration monitoring instrumentation has been installed to obtain a detailed, real-time analysis of the vibration being experienced and to be able to prepare a monitoring plan and a definitive threshold for shutdown for when the unit was restarted. **The DCISC Fact-Finding Team reviewed the monitoring plan and found it satisfactory and the DCISC representatives assessed that Unit 2 was in a good position for restart. The DCISC representatives concluded the 2Z22 forced outage was properly managed and the DCISC should review the final RCE during a future fact-finding.**

Dr. Budnitz reported the issues which occasioned the 2Z22 forced outage arose on the secondary side of the plant³ and do not have an important effect on the probability of an accident on the primary side. He observed the plant was properly shut down and maintained in that state such that the hydrogen leak did not present a public safety issue. Dr. Lam remarked at times risk

³ Primary and secondary side refer, respectively, to the Reactor Coolant System which is used to remove heat from the nuclear reactor and to the Main Steam and Feedwater Systems which provide cooling to the steam generators and generate and provide steam to the turbines.

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assessment relies on modeling of a component failure and he stated he found the information and conclusions presented by Mr. McWhorter to be compelling as they are based upon **first principal [or first principle ?] observation** which he found more credible than any detailed modeling one might develop. Dr. Budnitz observed that a nuclear power plant is safest when shut down and safer when it is running as opposed to during shutdown as there is always modest risk involved in the process of shutting a plant down but that risk is less when it involves an issue on the secondary side as opposed to the primary side.

➤ Cybersecurity Program – Mr. McWhorter reported the Cybersecurity Program which was implemented at DCPD in 2017 provides protection for approximately 4,000 critical digital assets many of which are small, programmable components. He reported the DCISC team conducted a regular review and the Cyber Security program has not changed significantly since the time of the DCISC's prior review other than to provide ongoing maintenance. He reported there have been some minor implementation issues and lessons learned including regarding the control of maintenance activities. An NRC inspection of the Cybersecurity Program is scheduled for March 2021 and a self-assessment was recently conducted by the plant which identified the program as being generally in good order. **The DCISC Fact-Finding Team found the Cybersecurity Program to be effectively managed and recommended the DCISC follow-up on the results of the NRC inspection.**

➤ Radioactive Waste Processing Systems – Mr. McWhorter reported these systems process primarily liquid and solid waste. The Liquid Radioactive Waste System (LRWS) collects liquid waste from all sources, approximately one million gallons per year, which is filtered and processed through ion exchangers to remove most of the radioactivity and the remaining small amounts of radioactivity are discharged to the Pacific Ocean through the Auxiliary Saltwater (ASW) System. Mr. McWhorter reported the LRWS is generally healthy and effective in managing liquid radioactive waste and discharged approximately 30 millicuries, not including tritium, to the environment during 2019 which is within NRC allowable limits and which represents performance in the industry's third performance quartile due to an off-normal event in 2019 that generated a larger amount of liquid waste because of a caustic liquid spill which did not represent a direct release and concerning which the Committee has received a report in the past. The DCISC representatives also briefly reviewed the Solid Radioactive Waste System (SRWS) which provides for removal from DCPD of radioactive ion exchanging media and other solid radioactive waste by shipping it off-site and out of state. The DCISC fact-finding team found both the LRWS and the SRWS to be effective in minimizing the volume of radioactive waste released to the environment.

➤ Meet with DCPD Officer -The fact-finding team met with DCPD Site Vice President Ms. Paula Gerfen to discuss items reviewed during the fact-finding and other subjects of interest.

➤ Seismically Induced System Interactions (SISI) Program – Mr. McWhorter described this as a routine review of a program unique to DCPD that is intended to protect installed plant equipment against seismic events and from unrestrained temporary equipment or components. The Fact-Finding Team found the SISI Program to be effective and healthy with no significant

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issues. Some programmatic changes were recently made that improved performance including use of a checklist in the field to improve accountability.

➤ Control Room Simulator – Mr. McWhorter reported the Control Room Simulator is a full-size accurate copy of the Unit 1 Control Room and the Simulator is used for training and operator examinations. The Simulator uses the same equipment as the Control Room and events can be simulated by the Simulator's computer system for which the software was upgraded approximately two years ago which Mr. McWhorter reported improved the stability of the event modeling, eased its use by instructors in programming the system and enhanced system reliability. Mr. McWhorter reported Simulator facility is regularly tested in accordance with American Nuclear Standards Institute (ANSI) Standard 3.5 which compare the performance of the Simulator to actual plant performance during events. The conclusion of the DCISC review was the Simulator continues to perform its function well in support of operator training and examinations.

➤ Drone Sightings – Mr. McWhorter reported this issue concerning drone sightings at U.S. nuclear power plants was brought to the Committee's attention by representatives of the Alliance for Nuclear Responsibility. The issue dates back to 2014 when the NRC made all nuclear power plants aware of a possible security threat posed by drone activity and requested all plants to report drone sightings, several of which were reported by DCPD during 2017-2018. Mr. McWhorter reported that although details of these events are considered safeguards information and are not in the public domain, the sightings were over the large owner-controlled areas of DCPD and not typically near the plant's protected area. Mr. McWhorter reported a small drone does not consist of mass such that it poses a significant physical threat, as nuclear power plants are required to consider the effect of a large aircraft impact on a station and information on the areas around nuclear power plants is generally available through Google maps or other public sources. Current security planning assumes an attacker would have access to a fairly large body of knowledge about a plant. He reported drone sightings are treated similarly to incursions by watercraft into the one mile exclusion zone off shore from DCPD for which a report is made to the U.S. Coast Guard. He reported DCPD recently became the first U.S. nuclear power plant to obtain a permanent airspace restriction near the plant from the Federal Aviation Administration (FAA) and this provides a strong legal basis for prosecution of individuals found to be violating restricted airspace. Mr. McWhorter reported the Fact-Finding Team determined DCPD continues to monitor drone activity in the vicinity of the power plant and has acted appropriately when drones have been observed in the past.

➤ Engineering Reorganization and Excellence Plan – Mr. McWhorter reported the Engineering organization was reorganized in 2018 to transform System Engineering to Strategic Engineering, with a focus on long-range activities while removing Strategic Engineering's focus on supporting emergent activities or work in the plant. Responsibility for tactical and emergent work in the plant was transferred to the Engineering Fix It Now (EFIN) Team and to the Component Engineering organization. Effectiveness reviews of the transition have been completed and it is generally considered to have been successful. The DCISC representatives reviewed the Engineering Excellence Plan including six broad areas which focus on the transition of DCPD engineers as work at the plant begins to ramp down with the cessation of power

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operations. Mr. McWhorter stated the Fact-Finding Team concluded the Engineering Department continues to perform effectively and the organizational changes were effectively implemented.

➤ Nuclear Safety Oversight Committee Exit Meeting - On November 19, 2020, Mr. McWhorter reported that with Dr. Budnitz he observed an exit meeting of the Nuclear Safety Oversight Committee (NSOC). He reported the NSOC's function is similar to that of other committees required by NRC Standard Technical Specifications for each of the five operating reactor types including pressurized water reactors such as DCP. [Each licensee authorized to operate a nuclear power plant must provide technical specifications derived from the analyses and evaluations included in the safety analysis report for the plant and as amended and the NRC includes such additional plant-specific technical specifications within its Standard Technical Specifications for the reactor type ("Technical Specifications").] The NSOC consists of six external executive-level industry peers and it conducts its review of DCP's performance three times each year over a four-day period. For the latest review period two members of the NSOC visited the plant in person while the other four members performed their reviews remotely. While the conclusions of the NSOC are governed by confidentiality restrictions, Mr. McWhorter reported the NSOC appeared comprehensive in its investigations and candid in its reports with no significant safety concerns having been identified. **Two items were noted for follow-up by the NSOC in January 2021, those being the results of the corporate assessment of DCP by the Institute of Nuclear Power Operations (INPO) and an item involving the Low Temperature Over-pressurization Protection (LTOP) System. Mr. McWhorter reported the DCISC representatives found the NSOC meeting to be effective and the DCISC should follow up on these two items.**

Following Mr. McWhorter's presentation, Ms. Judith Iklé, Branch Manager for the Procurement Strategy and Oversight Branch within the California Public Utilities Commission's (CPUC) Energy Division, was recognized. The Chair welcomed Ms. Iklé to the meeting. Ms. Iklé stated she was concerned regarding the Unit 2 forced outages and she inquired as to two matters: whether the Control Room Simulator as it is a mock-up of the Unit 1 Control Room could have had an effect on the forced outages; and how the EFIN Teams might be involved in the forced outages. Mr. McWhorter replied the Simulator is used for training operators for Unit 2 as well as for Unit 1 and the DCP units are very similar with regard to control and operation of the turbines. Mr. McWhorter reported that during the January 2021 fact-finding the DCISC learned the physical construction of the frames of the main generators for Unit 1 and Unit 2 differ and this is a reason why Unit 1 has not experienced problems similar to those encountered by Unit 2. But Mr. McWhorter stated these differences would not be reflective of any modeling changes needed by the Simulator and would not make a difference to the operation of the generators from the Control Room. Mr. Baldwin responded that the EFIN Teams have been a core support and troubleshooting organization for DCP with respect to the Unit 2 Main Generator forced outages and the plant's Engineering organization is interacting with the vendor and with the consultants engaged. The EFIN Team has been reviewing and supporting the recommended repair plans and modifications to the generator that have been proposed by the vendor and the consultants. He remarked the EFIN Team is the plant's first-line of expertise with respect to issues encountered in the plant. Dr. Peterson reported the Unit 1 and Unit 2 Control Rooms are both located within the

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same larger Control Room and the Unit 1 and Unit 2 Control Rooms at DCPD are essentially identical and the operators are licensed by the NRC to operate either of the two units.

Mr. John Geesman representing the Alliance for Nuclear Responsibility was recognized. Mr. Geesman inquired as to the FAA designation of restricted airspace around DCPD and whether that designation would be permanent, specifically extending to the operation of the Independent Spent Fuel Storage Installation (ISFSI). Mr. McWhorter replied he did not have that information but as a presentation is scheduled by DCPD for later in this public meeting Mr. Geesman's question might be answered at that time.

Upon a motion made by Dr. Budnitz, seconded by Dr. Peterson, the November 10-12 and 19, 2020 Fact Finding Report was accepted by the DCISC and its transmittal to PG&E was authorized. The report will become a part of the Committee's 31st Annual Report.

The Chair requested Assistant Legal Counsel Rathie to report on administrative, regulatory, and legal matters. Mr. Rathie repeated the announcement he made earlier about a change in the order of the agenda for the afternoon session. He also reported the Office of Legal Counsel has developed, in consultation with Sun Star Media of Monterey, California, a new website for the DCISC and the site remains in development and he requested any suggestions or feedback on how the site might become a more useful tool for the Committee. He reported that the Committee's website www.dcisc.org has averaged 621 unique visits every month during 2020 with the greatest number of visitors being from the United States, the Russian Federation, Saudi Arabia and Great Britain..

Mr. Rathie reported that on November 13, 2020, with Dr. Budnitz he attended a remote meeting with members of the California Attorney General's staff to discuss a number of topics which the Committee has recently been following and reviewing. Dr. Budnitz stated that as the Attorney General's appointee to the Committee these meetings are held from time to time to keep the Attorney General's office updated and to provide answers to any questions the Attorney General's staff may have. Mr. Rathie reported the Committee's 30th Annual Report has been issued in two bound volumes and made available on the Committee's website and will soon be distributed in a compact disk format.

Mr. Rathie reported the Committee recently received and responded to an inquiry from David Zizmor, Esq., of the CPUC Energy Division concerning the Unit 2 Main Generator hydrogen leak issue.

In closing his remarks, Mr. Rathie reported the Committee continues to await the issuance of a proposed decision in the 2018 Nuclear Decommissioning Cost Triennial Proceeding (2018 NDCTP) which proceeding includes a proposed Settlement Agreement which may, if it is approved as part of the 2018 NDCTP, provide a venue to extend the Committee's safety oversight role to the post-shutdown period. He reported the process for making the next appointment of a member to the DCISC by the Chair of the California Energy Commission is now underway with Dr. Lam and Dr. Michael Quinn having been selected as candidates by the President of the CPUC. Dr. Peterson announced that he has recently been reappointed by the Governor to serve a

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term on the Committee commencing on July 1, 2000 through June 30, 2023. Mr. Rathie reported Form 700 Statements of Economic Interest have been distributed to the Members as required by the CPUC Decisions which created and continued the Committee.

VIII ADJOURN MORNING MEETING

The Chair adjourned the morning meeting of the DCISC at 12:22 P.M.

IX RECONVENE FOR AFTERNOON MEETING

The afternoon meeting of the DCISC was convened by the Chair at 1:30 P.M.

X COMMITTEE MEMBER COMMENTS

There were no comments from any Members at this time.

XI PUBLIC COMMENTS AND COMMUNICATIONS

Dr. Lam invited members of the public to address the Committee on matters not on the agenda for this meeting.

Assistant Legal Counsel Rathie reported that shortly before adjournment this morning a communication was received from Mr. David Weisman of the Alliance for Nuclear Responsibility. The communication included a video made 15 years ago with comments by the then members of the DCISC concerning the Committee having scheduled a public meeting on Yom Kippur. The Chair observed the video confirmed a lack of sensitivity in the past by the Committee and in the present by the federal agency for having scheduled events on high holy days for those of the Jewish faith.

XII INFORMATION ITEMS BEFORE THE COMMITTEE

The Chair requested PG&E Director of Generation Business Planning Mr. Thomas Baldwin to introduce the first of the informational presentations for this public meeting. Mr. Baldwin introduced the DCPD Director of Risk and Compliance Mr. Russ Prentice to make that presentation concerning the NRC's assessment of plant performance. Mr. Baldwin reported Mr. Prentice was licensed as a Senior Reactor Operator and has been employed at DCPD for more than ten years including as Maintenance and Instrumentation & Controls Manager. In his present assignment Mr. Prentice oversees the Generation organization's regulatory relations and risk programs including those for DCPD. Mr. Prentice also serves on the Emergency Response Organization.

Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Issues Raised by NRC Resident Inspectors, Open Compliance Issues and License Amendment Requests and Other Significant Regulatory Issues/Requests.

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Mr. Prentice stated his presentation would provide an overview of DCP's performance based on NRC metrics and performance indicators for a period of approximately four months from November 2020 through February 2021. He remarked this presentation would cover approximately 1,800 hours of NRC inspection time. During this period DCP met and remained in the highest performance category for all performance expectations for all NRC performance indicators and continues to maintain margins with respect to equipment performance, regulatory performance and operational performance. No licensee event reports (LER) were issued by PG&E and there was one finding and two non-cited violations (NCVs) of very low safety significance issued by the NRC since the last DCISC public meeting in October 2020.

Mr. Prentice displayed the 16 performance indicators reviewed and used to collect data by the NRC, and concerning which data is collected daily, as currently being within Green⁴ status with margin for both units as follows.

- Unplanned Scrams per 7000 Critical Hrs.
- Unplanned Power Changes per 7000 Critical Hrs.
- Unplanned Scrams with Complications
- Safety System Functional Failures
- Mitigating Systems Performance Index, Emergency AC Power System
- Mitigating Systems Performance Index, High Pressure Injection System
- Mitigating Systems Performance Index, Heat Removal System
- Mitigating Systems Performance Index, Residual Heat Removal System
- Mitigating Systems Performance Index, Cooling Water Systems
- Reactor Coolant System Activity
- Reactor Coolant System Leakage
- Drill/Exercise Performance
- ERO Drill Participation
- Alert & Notification System
- Occupational Exposure Control Effectiveness
- Radiological Effluent Occurrence

Mr. Prentice reported on the NCVs and the finding issued by the NRC for the period November 2020 through February 2021 and he stated there were three such violations issued:

- Non-Cited Violation (Green) – associated with the level of detail in the documentation for the evaluation performed for scaffolding placed in the plant in support of maintenance on a diesel

⁴ The safety significance characterizations used for the performance indicators as either Green (very low), White (low to moderate) Yellow (substantial) or Red (high). A Green non-cited violation indicates very low safety significance, with no impact to public health and safety.

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generator. (Cross-cutting aspect⁵ H-1 Resources/Inadequate Procedure.) Mr. Prentice stated review of this NCV revealed a need for improvement of processes and procedural control for performing scaffolding evaluations with respect to locating scaffolding in proximity to other equipment. In response to Dr. Budnitz' observation Mr. Prentice stated the vulnerability lay in the level of procedural rigor and documentation and in response to Dr. Lam's observation he stated the intent of the procedure is to review and assess seismically induced system interaction. Dr. Budnitz observed a regulatory guide exists on the procedural requirements for the technical analysis. In response to Dr. Lam's comment that, given the low probability of a seismic event, perhaps the regulatory guide may be an example of excessive and unnecessary regulation Dr. Budnitz replied that while the probability of a seismic event is low it is not zero and the NRC does not distinguish the need for the technical analysis based on the duration the scaffolding or other equipment is expected to remain in place.

➤ Finding (Green) – associated with the inadequate use of industry operating experience associated with environmental corrosion of outdoor piping. (No cross-cutting aspect assigned.) This finding was associated with the corrosion found on outdoor piping of the Auxiliary Feedwater (AFW) System and will be discussed in more detail during this public meeting. Mr. Prentice stated this was a self-revealing finding and the inadequate assessment of prior operating experience on corrosion under insulation was not indicative of current performance due to improvements made to the Operating Experience Program.

➤ Non-Cited Violation (Green) – associated with a Containment spray drain valve mispositioning that occurred during 1R22. (Cross-cutting H-12 avoidance of complacency.) Mr. Prentice stated this violation occurred when the Containment Spray System was being realigned for testing and a valve supposedly verified to be in the closed position was found not to be closed due to the valve being stuck. The issue involved ensuring extra verifications are in place and the steps taken include implementing improved briefings and component history regarding performing verifications to raise awareness. Mr. Prentice stated that information concerning this violation has been widely communicated to station personnel.

Mr. Prentice displayed the NRC Cross-Cutting Issues Summary with performance over a rolling four-month period and stated DCPD remains in Green status for all categories with only two cross-cutting aspects identified for H-1 and H-12 as discussed. He reported for 2020 a total of four violations were issued by the NRC which he described as a low number indicative of proactive performance monitoring. No licensee amendment requests were issued during the period November 2020 to February 2021.

Mr. Prentice stated DCPD's overall performance remains in the highest performance category for all NRC Performance Indicators and three inspection reports have been issued since

⁵ Cross-Cutting Aspect is the performance characteristic of a violation that is either the primary cause of the performance deficiency or the most significant contributing cause.

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the last public meeting of the DCISC as follows:

- 3rd Quarter 2020 Integrated Inspection Report (2020-003, 10/29/2020).
- Problem Identification and Resolution (PI&R) Inspection (2020-010, 10/30/2020).
- 4th Quarter 2020 Integrated Inspection Report (2020-004, 01/26/2021).

In response to Consultant McWhorter's inquiry Mr. Prentice stated the DCPD Decommissioning organization is monitoring the need for license amendment requests in context of decommissioning the power plant. He reported his organization is evaluating a potential license amendment request related to Technical Specification surveillance completion time requirements. In response to Dr. Budnitz' inquiry Mr. Prentice reported there are presently no issues under review by Mr. Prentice's organization regarding permits issued by the state. In response to Dr. Lam's query Mr. Prentice confirmed that his organization is involved with the risk-informed aspects of decommissioning and is reviewing options and industry lessons learned and working with the DCPD Decommissioning organization in this effort to ensure the most up to date information is used to drive the mitigation necessary to ensure a successful transition to decommissioning.

Ms. Sherry Lewis of San Luis Obispo Mother for Peace was recognized. Ms. Lewis questioned whether the NCV related to the Containment spray drain valve involved a situation where the valve was not stuck but was tied open and its purported closure was verified by two people and if this were the case she questioned whether avoidance of complacency was the correct designation for this event. Mr. Prentice confirmed the valve was the same as described by Ms. Lewis and he observed the cross-cutting aspect of this event was assigned by the NRC not by DCPD. He stated there were other factors involved and in a nuclear industry context complacency has aspects which include challenging assumptions and he stated that accordingly there was an opportunity to improve the way operators in the field addressed that event.

Ms. Judith Iklé, Branch Manager for the CPUC Energy Division office of Procurement Strategy and Oversight was recognized.. Ms. Iklé stated from the perspective of the CPUC her interest was in operational performance, safety and reliability and she inquired as to the Green finding associated with inadequate use of industry operating experience concerning the corrosion of the AFW System piping and as to whether the issue involved DCPD staff's inadequate use of industry operating experience and if so how that matter is being addressed. Mr. Prentice stated the AFW System corrosion involved corrosion found under insulation and the issue of under-insulation corrosion was identified elsewhere in the industry at another facility during the period 2008-2009. At that time he stated there was a missed opportunity by DCPD to identify its broader implications and to have put measures in place that would have required routine inspections and this could have resulted in the recent event at DCPD not occurring. Mr. Prentice stated that since 2008-2009 there have been improvements made to the Operating Experience Program at DCPD and additional actions have been taken to prevent a recurrence. These actions include

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improvements to operating experience procedures, training on the subject of corrosion, performance of extent of condition reviews for various operating experience evaluations and walkdowns by the Engineering organization to identify extent of condition issues and to identify other locations where corrosion may occur under insulation. The AFW System corrosion event has been widely communicated to station personnel. Dr. Lam observed that these actions appear to be more than commensurate with the safety significance of the issue.

Mr. Baldwin next introduced DCPD Outage Manager Mr. Matt Coward and stated Mr. Coward holds a Bachelor's Degree in Mechanical Engineering from California Polytechnic State University in San Luis Obispo (Cal Poly) and is a registered Professional Engineer. Mr. Coward held a license from the NRC as a Senior Reactor Operator and has thirty years' experience with PG&E and in the nuclear industry. Mr. Baldwin reported Mr. Coward is DCPD's most tenured outage manager having led twelve refueling outages.

Performance During 22nd Refueling Outage for Unit 1 (1R22) Including Key Activities, Performance Indicators, Results Achieved, Fuel and Steam Generator Inspection Results, Unexpected Equipment Issues and Open Items.

Mr. Coward stated in his presentation he would summarize key activities, performance indicators and the results of the fuel and steam generator inspections during 1R22 which commenced on October 3 and terminated on November 2, 2020, and which Mr. Coward reported was the first DCPD refueling outage in more than ten years to have been completed in under 30 days.

Mr. Coward identified and discussed the key activities during 1R22 as follows:

- Reactor Vessel Hot Leg⁶ inspection – all four hot legs were inspected.
- Steam Generator - eddy current testing.
- Reactor Coolant Pump - seal replacement.
- Main Turbine LP "C" - inspection.
- Circulating Water Pump 1-1 - motor overhaul.
- Condensate Polisher Computer - upgrade
- 230 kV Tower – replacement of the tower closest to DCPD.
- 500 kV Tower 5-1 and 5-2, - vertical insulator replace on the towers closest to DCPD.
- Auxiliary Transformer 1-1 - high voltage bushing replacement (emergent work).

⁶ For pressurized water reactors such as those operated by DCPD the reactor vessel is a cylindrical vessel with a hemispherical bottom head and a removable hemispherical top head. There is one inlet (or cold leg) nozzle and one outlet (or hot leg) nozzle for each reactor coolant system (RCS) loop. Each of DCPD's reactors have four RCS loops.

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Mr. Coward stated the Outage Safety Plan and Outage Safety Schedule provide defense-in-depth levels which were maintained during 1R22 to ensure key safety functions were satisfied. High-risk and infrequently performed tests and evolutions (IPTE) during 1R22 included:

- Initial drain to lowered reactor coolant inventory for reactor disassembly and reassembly.
- Refueling cavity drain to lowered reactor coolant inventory following core reload.
- Vital bus transfer and integrated safeguards testing done at the start of 1R22.
- Initial criticality of the new reactor core.
- Performance of heavy lifts over the reactor core.

Mr. Coward reviewed the performance metric goals set and the results achieved during 1R22, which commenced on October 3 at 2100 hours and concluded on November 2, 2020, at 2140 hours as follows:

<u>Performance Measure:</u>	<u>Goal</u>	<u>Actual</u>
Serious Near Hit events	0	0
Nuclear Safety Events	0	0
Site Clock resets	0	0
Outage duration (Days)	30	29.9
ALARA –As Low As Reasonably Achievable (Rem)	30.5	26.7
Power Ascension (Days)	5	4.1

Mr. Coward observed that previously refueling outages commenced at midnight but one of the lessons learned during prior outages was that this timing puts the residual heat removal flush on the critical path right at the time of a change of an Operations shift and by commencing 1R22 at 9:00 p.m.(2100 hours) this situation was avoided. Mr. Coward remarked the outage performance metrics were achieved during a period when Unit 2 was in a forced outage that began almost half-way through 1R22. In response to Consultant Wardell's query Mr. Coward stated the plant sets a 90-day goal for continuous operation once a unit returns to full power after a refueling outage and to date Unit 1 is continuing to perform well.

Mr. Coward discussed the results achieved during 1R22.

- Hot leg inspection – robotic ultrasonic inspections performed underwater by Westinghouse of welds and reactor coolant piping as part of DCPD In-service Inspection Program to detect either development of new flaws or stress corrosion cracking based on review of previous data. Dr. Peterson observed the weld locations for the welds that join the hot leg piping to the vessel likely presents particular challenges for eddy current inspection.
- Steam Generator eddy current inspection – no tubes were plugged and Mr. Coward reported 1R22 should be the final time steam generator eddy current inspection is performed for Unit 1 due to its scheduled retirement.

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- Zero significant Human Performance Events.
- Line ownership, i.e., individual organizational ownership, of the As Low As Reasonably Achievable (ALARA) radiation minimization program continues to be a strength.
- Best collective radiation exposure for Unit 1
- Addressed the Unit 2 forced outage in an effective manner during 1R22.

In response to Dr. Lam's inquiry Mr. Coward replied there were no inspection activity reductions during 1R22 because of the scheduled retirement of Unit 1 on November 2, 2024. He reported the only item shifted from 1R22 to 1R23 involved some discretionary work for the 10-year In-Service Inspection Program. No license amendments or other relief was requested of the NRC for 1R22.

Mr. Coward reviewed the fuel and steam generator inspection results during 1R22 as follows:

- No fuel defects - fuel and bottom nozzles examined with high-definition cameras underwater with no defects or debris found.
- Only minor non-safety significant fuel findings associated with boric acid on some fuel.
- Steam Generator inspections revealed no findings.

Mr. Coward reported that during 1R22 in-processing for temporary workers DCPD brought in 743 temporary outage workers to assist in outage and related work activities. Included were staff augmentation as well as vendor personnel. Due to the COVID-19 pandemic in progress during 1R22 efforts were undertaken to minimize the numbers of personnel on-site. In response to Dr. Lam's query Mr. Coward stated the number of personnel employed during the outage was appropriate to the scope of work during 1R22. Mr. Coward reported that due to the approaching end of the license period for DCPD there were no large projects planned during 1R22.

Mr. Coward stated that follow-up tasks from the outage include extensive work on the reliability of fuel handling equipment. He described the operation of the Upender mechanism which is used as part of the fuel movement and transfer process from the reactor vessel to the spent fuel pool. He reported that during 1R22 the kicker spring on the Upender, which functions to tip the fuel off-center and allow it to lay in a horizontal position, failed. New kicker springs will be installed in the Upender for Unit 2 during 2R22 and for Unit 1 during 1R23. Mr. Coward reported the decision not to repair the kicker spring during 1R22 was based upon the radiation exposure which would have been incurred.

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In response to Consultant McWhorter's request Mr. Coward identified some of the major activities planned for 2R22 including Main Generator repairs for the stator core cooling water inlet and outlet headers, work at the ends of both the turbine and the exciter, two low pressure turbine inspections, and a reactor vessel hot leg inspection. There will be no eddy current inspection required for Unit 2 during 2R22 and Unit 2 will also have vital bus H cleared. Mr. Coward reported that due to the expected 49-day length of 2R22 one emergency diesel generator will have a maintenance window conducted during the outage. He reported the use of wet axial burnable absorbers in the nuclear fuel is a consequence of a core redesign required as a result of the duration of the Unit 2 outages and this will also be addressed during 2R22. In response to Dr. Budnitz' inquiry Mr. Coward identified the work on the Main Generator as the critical path for 2R22. Mr. Coward stated DCPD estimates the traditional refueling outage work performed during 2R22 will occupy 28 days and the balance of the expected 49-day duration will be due to work on the Main Generator. Once that work is completed he stated the plan is to be in a position to perform restart and progress smoothly through startup.

Mr. Coward reported for 1R22 COVID-19 procedures were established including standards concerning the use of face coverings by personnel. Early in the outage two workers at DCPD experienced heat stress due to wearing masks and a clarification to the procedure to direct personnel to socially distance and lower their mask if experiencing distress was implemented. Spare masks were provided to replace potentially contaminated masks.

In response to Consultant Wardell's questions Mr. Coward reported that prior to 1R22 an issue was addressed concerning the software for the spent fuel bridge crane but other than the broken Upender kicker spring there were no other issues experienced with the fuel handling equipment. Mr. Coward reported the Foreign Material Exclusion (FME) Program performed well with no challenges experienced for the Main Generator, the low pressure turbine or the reactor cavity. He reported due to operating experience at a nuclear power plant owned by the Excelon Corporation DCPD performed a full inspection of its latching tools due to a latching tool at the Excelon plant having lost a rivet into the Excelon plant's rod control cluster assembly.

Following Mr. Coward's presentation Ms. Judith Iklé, Branch Manager for the CPUC Energy Division office of Procurement Strategy and Oversight, was recognized. In response to Ms. Iklé's inquiry Mr. Coward stated the dates he provided for the 2R22 outage were estimates and an official submittal will be provided to the grid operator. He reported at this time the goal for 2R22 is to complete the outage in 49 days and to commence the outage on March 13, 2021, at 2100 hours. He reported that each unit has three 2.4 megawatt, air-cooled, emergency diesel generators (EDG) which provide back-up power to the plant's 4kV vital buses and during 2R22 one of the Unit 2 EDGs will be inspected and tested. Mr. Coward remarked this work would usually be performed while the unit was online but due to the duration of 2R22 the work has been scheduled during the outage.

Ms. Sherry Lewis was recognized. Ms. Lewis remarked that in context of nuclear power the problem lies in having a terrifyingly dangerous and complicated mechanical process that has to be run absolutely perfectly at all times. Dr. Budnitz responded that this was not a correct characterization of DCPD or any other nuclear power plant as nuclear power plants are designed,

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maintained and operated such that certain equipment failures can occur yet the plant remains safe and Dr. Budnitz provided several examples including the FLEX⁷ strategy and the redundancy of having six EDGs. He remarked this diversity and redundancy is designed precisely in order to allow one or more components to fail and yet the plant will remain adequately safe. Dr. Budnitz observed the DCISC has devoted a substantial amount of time to reviewing defense-in-depth strategies and it is simply not correct that everything must run perfectly at all times or a disaster will occur.

Mr. John Geesman representing the Alliance for Nuclear Responsibility was recognized. Mr. Geesman inquired as to the expected operational lifetime for the Upender kicker spring and whether the spring that failed was part of the plant's original equipment. Mr. Coward reported that the spring which failed is part of the Upender transfer cart system and was original plant equipment and was not included in the Preventative Maintenance Program. He stated the failure of the kicker spring did not have nuclear safety consequences as the fuel remained in a safe condition. One other instance of a failure of a kicker spring within the nuclear industry was discovered. Dr. Budnitz remarked the fact that there was one other incidence of a kicker spring failure, the consequences of which did not impact nuclear safety, calls into question DCP's evaluation of operating experience. Consultant Wardell remarked the fact that there was no safety concern and the spring is a passive component, and springs rarely fail, together with the fact that the plant was able to continue with the movement of the fuel makes this event unusual but not an event that DCP should necessarily have discovered ahead of time.

In response to Mr. Rathie's observation concerning operating experience Dr. Budnitz confirmed the Operating Experience Programs at nuclear power plants represent a systematic, carefully structured, international effort to document and to share information and evaluations on operational events amongst nuclear facilities. At DCP operating experience information is reviewed and evaluated on a daily basis. Dr. Budnitz observed these programs did not exist at the time of the accident in March 1979 at the Three Mile Island Nuclear Generating Station (TMI) in Pennsylvania. Dr. Budnitz reported a similar event to that which caused the partial meltdown of TMI Unit 2 occurred approximately one year before the accident at TMI at a different power plant but the event was identified and the accident sequence was interrupted by the other plant. He stated that had an operating experience program been in place in the industry at the time of the TMI accident there is a very high likelihood the accident at TMI would not have occurred. Dr. Budnitz stated one of the most important lessons learned from the TMI accident was the importance of documenting and sharing operating experience.

Mr. John Geesman representing the Alliance for Nuclear Responsibility was recognized. Mr. Geesman remarked there was confirmation earlier during this public meeting that operating experience is not always perfect and this fact is demonstrated by the Auxiliary Feedwater System under insulation piping corrosion event which went undetected despite the identification of an

⁷ 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 beyond design basis events.

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earlier occurrence. Mr. Geesman observed that his client's concern is that problems are quite often not identified as being of safety significance until they are found to be so and it may be a mistake to place too much faith in operating experience. Dr. Budnitz stated he agreed with Mr. Geesman's observation and this represent a major concern and worry for everyone in the nuclear industry as the effectiveness of any operating experience program depends upon the events being correctly documented and categorized correctly and for that information to be accessible when a search is undertaken. Dr. Budnitz acknowledged that some events which should be documented are not and hence the program is not perfect and this is more reason that a defense-in-depth strategy must always be employed. He observed that any assertion that the risk of a core damage accident is zero is simply not correct and he agreed with Mr. Geesman's comment that placing too much reliance on core damage frequency is a parallel concern which can result in overlooking other potential risks.

The Chair thanked Mr. Coward for his presentation and a short break followed.

Mr. Baldwin introduced DCPD Station Director Mr. Cary Harbor who has given many presentations to the Committee in the past. Mr. Harbor has more than 30 years' experience in the nuclear industry including holding leadership positions at DCPD in Engineering, Operations, Maintenance, Quality Services and in Generation Risk and Business Planning organizations. Mr. Baldwin reported Mr. Harbor held a Senior Reactor Operator License and holds a Bachelor of Science Degree in Nuclear Engineering from the University of California at Santa Barbara as well as a Certificate from Stanford's Certificated Program in Executive Business Administration.

Presentation on the State of the Plant including Key Events, Highlights, Outages Including Unit 2 Forced Outages to Address Main Generator Issues, Organizational Changes, Response to the COVID-19 Pandemic, and Other Station Activities since the DCISC's October 2020 Public Meeting.

Mr. Harbor reported Unit 1 is currently safely operating at 100% power with a probabilistic risk assessment (PRA) of Green, meaning all items are within acceptable risk parameters. Since returning to operation after 1R22 Unit 1 has been at 100% power with no significant issues. Unit 2 is safely shutdown in Mode 3⁸ to perform maintenance on the Main Generator. He reported all NRC Performance Indicators are Green. Mr. Harbor displayed graphs showing the daily load profiles for calendar year 2020 for both units. Mr. Harbor reported the team working on the Unit 2 Main Generator issue have demonstrated good engagement.

Mr. Harbor reported the station has completed the Tier 2 Employee Retention Agreement period with more than 90% of the workforce signing retention agreements and there have been no anomalies identified to date concerning future staffing issues. He reported there has been no

⁸ For Westinghouse pressurized water reactors: Mode 1 is power operation, Mode 2 is startup, Mode 3 is hot standby, Mode 4 is hot shutdown, Mode 5 is cold shutdown, and Mode 6 is refueling.

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impact on DCP's safe operations due to employee attrition and a robust monitoring program is in place.

Concerning the COVID-19 pandemic which began in March 2020, Mr. Harbor stated the plant was challenged to work through the issues presented and to develop standards including the wearing of face coverings and maintaining social distancing. Temperature monitoring was instituted for all personnel entering the plant as well as development of a live-safe computer application which allows personnel to self-screen before coming to the station. Work stations have been modified to provide plexiglass separation. Mr. Harbor reported to date there have been a total of 68 cases of COVID-19 amongst the thousands of persons who have had access to the plant since March 2020. He reported at the present time there are no employees actively recovering from COVID-19 and six persons remain in quarantine. In response to Consultant McWhorter's inquiry Mr. Harbor stated that to date there has been no confirmation of the on-site transmission of the COVID-19 virus identified. Mr. Harbor reported the lessons learned during 1R22 concerning face coverings and heat stress will be implemented during 2R22.

Concerning the Unit 2 electrical Main Generator Mr. Harbor stated the issues encountered do not represent nuclear safety issues and do not affect or include the plant's steam generators. The work is being performed on the main electrical generator on non-nuclear side of the plant and there has been no impact to the health and safety of the DCP workforce or on the community. DCP has been working to address vibration issues on the Unit 2 Main Generator and Mr. Harbor reported the plant is committed to making sure it is fully capable and reliable as the high energy demand season approaches. Extensive investigation and analysis are being performed by PG&E, by the Siemens firm as the generator vendor, and by industry experts. DCP has engaged structural experts, generator experts, and the Electric Power Research Institute in the effort to resolve the issues with the Unit 2 Main Generator.

Mr. Harbor reported modifications were made to the Unit 2 Main Generator at the end of 2020 and an effort has continued into 2021 to identify, repair and resolve issues identified with vibration of the Main Generator. Mr. Harbor displayed a visual representation of a 3-D model developed to identify where vibration is taking place and causing the generator to move. Mr. Harbor stated these issues mainly involve the generator's frame but the stator is also experiencing some level of vibration and it is important that this vibration be dampened as it is this vibration that is causing the cracks which have resulted in hydrogen leaking into the generator's cooling system. Mr. Harbor displayed another visualization of the generator showing where three weights have been placed on each side of the Unit 2 Main Generator to help dampen the vibration by changing the resonance frequency.

Mr. Harbor reported the repairs to the Unit 2 Main Generator include adding additional plastic resin blocking or support in the end-winding which was determined to be vibrating. He stated another small crack has been identified on a parallel ring at the last winding of the exciter end of the generator through elevated hydrogen levels in the cooling water but the hydrogen leakage as a result of this small crack has not resulted in the need to shut down the unit. Mr. Harbor reported the ring where cracking was experienced in the past is in the round ring in which the stator core cooling water goes into the system and feeds the generator stator. The new crack is

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in a parallel ring, which is a different ring serving a different function. He reported DCPD is now working on a repair plan and Unit 2 is now offline once again in order to perform additional inspections and to look for other areas with small cracks and make adjustments based on what has been and will be learned. Mr. Harbor reported that a decision should be forthcoming in the next 24-48 hours concerning a restart of Unit 2 prior to the planned 2R22 refueling outage scheduled to commence in March 2021. He stated the plan now is to bring Unit 2 back online for additional monitoring and data gathering prior to the scheduled spring refueling outage and then run the unit for period of time and then shut it down for the spring outage. During 2R22 Mr. Harbor reported DCPD will make additional refinements to address the vibration issues and replace some components. He commented PG&E is committed to ensuring the availability and reliability of Unit 2 well in advance of the summer months and, to this end, there is an importance placed on understanding the extent of condition and to identifying and addressing all the potential issues.

Mr. Harbor addressed upcoming station activities including completion of a recent reactor operator license class which he stated was one of DCPD's largest operator classes with more than 20 persons having completed exams and who are now awaiting the final results from the NRC. He reported 2R22 scheduled to start in March 2021 and the outage milestones are being developed. The commencement of 2R22 has been moved up by two weeks to try to ensure there is adequate time to complete repairs to the Main Generator. Mr. Harbor reported the NRC's Evaluated Emergency Planning Exercise & Inspection is now scheduled for September 15, 2021.

In response to Consultant McWhorter's inquiry Mr. Harbor stated taking Unit 2 offline was part of the planned response to the vibration issues with the unit having run through a trial period to see if additional cracks developed and the occurrence of the new crack prior to unit shutdown emphasized the need to take the unit offline to investigate and to attempt to understand the extent of condition. Dr. Lam reported the Committee received an inquiry from the CPUC concerning the hydrogen leak issue and came to a consensus that the leakage was not an issue of concern based upon the inventory of hydrogen available, the presence of ambient air and the fact the leakage is into a water containment with no safety equipment in proximity. In response to Dr. Lam's comment Mr. Harbor stated that for perspective it is important to understand that hydrogen acts as a cooling mechanism for the generator such that water enters and takes heat away from the hydrogen through the cooling system and if for some reason there is a crack or a leak, hydrogen in small quantities enters the closed Stator Cooling Water System due to a pressure differential. Mr. Harbor reported the system is designed in such a way that the hydrogen is intended to be identified before the leakage becomes an issue.

Mr. John Geesman representing the Alliance for Nuclear Responsibility was recognized. Mr. Geesman observed PG&E attributed a considerably greater danger to the risk of a hydrogen leak in its attempt to justify the stator repair project. Mr. Geesman inquired if the stator repair project had a correlation to the problems Unit 2 experienced with hydrogen leaks and might there have been an element of causation involved. Mr. Harbor responded and stated the replacement of the stator and of the generator's internals was made due to those components having exceeded their expected lifespan and this represented a potential for greater failure than what DCPD is now experiencing. Mr. Harbor reported the cause of the stator replacement was due to issues experienced with the older generator components which had more than 30 years of wear and the

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problems DCPD is now experiencing were likely due to the generator now having a tightly packed stator core and the changes that were made in the replacement of the stator are now producing the vibration which aligns with a resonance frequency which has resulted in the problem. Mr. Harbor reported that prior to the stator replacement the Unit 2 Main Generator did not have vibration levels that were causing cracking or hydrogen leakage into the Stator Cooling Water System. In response to Mr. Geesman's inquiry as to whether it was a mistake to restart Unit 2 in November 2020, Mr. Harbor stated that after the initial cracking issue was identified in July 2020 it was believed the issue was attributable to workmanship, specifically the quality of a certain weld. At that time instruments for measuring vibration were not in place on the generator and other than the quality of the weld there was nothing identified as a main driver for the problem. Mr. Harbor stated that immediately after a second crack was identified specific structural experts were brought in to assess the problem and to develop a 3-D model. In response to Dr. Budnitz' inquiry, Mr. Harbor stated that DCPD has not identified and is not aware of any operating experience concerning the issues experienced with the Unit 2 Main Generator.

In response to Dr. Lam's inquiry as to the cost of the Unit 2 Main Generator repairs, Mr. Harbor stated there has been no impact due to the repairs from a financial standpoint but having one unit shut down does have financial implications. Mr. Harbor stated there is a warranty from Siemens which PG&E expects Siemen will honor and no litigation has been commenced in connection with the Unit 2 Main Generator issues.

Mr. Jane Swanson of the group San Luis Obispo Mothers for Peace was recognized. Ms. Swanson inquired whether the replacement stator was newly manufactured or refurbished. Mr. Harbor replied that with the exception of the generator shell the stator has all new components. He remarked that seismic, technical and other considerations including the weight of the stator make it infeasible to completely remove and replace an intact stator and the work of replacement was accomplished by packing all the components. In response to Ms. Swanson's query Mr. Harbor confirmed that the capacity factor for Unit 2 he provided during his presentation was for its operation during calendar year 2020 and the capacity factor metric represents more than just the time the unit is on-line as this metric also includes production of a certain amount of energy. Mr. Harbor stated he does not at present have data for the capacity factors for 2021.

Mr. Greg Haas, District Representative for U.S. Representative Salud Carbajal was recognized. Mr. Haas inquired and Mr. Harbor confirmed that DCPD will be making a decision very soon concerning restarting Unit 2 before commencing its next refueling outage (2R22). Mr. Harbor stated that this decision will be based upon the repair plan involved and the duration of the repairs. Mr. Haas stated he understood that despite a restart prior to 2R22, during 2R22 DCPD will be making repairs to address the cracking that is causing the hydrogen leakage issue and he queried whether there might be a need following 2R22 to again shut the unit down to make further repair. Mr. Harbor responded that while he could not answer with certainty the expectation is that the plant should be able to accomplish all the needed repair during the 47-49 day duration planned for 2R22 commencing in early March 2021 to and bring Unit 2 back on line for a reliable run with the vibration dampening counterweights remaining in place. He reported blocking material will be installed at the stator end winding to address cracking on the parallel ring and this is expected to be successful in preventing further cracking.

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Ms. Judith Iklé of the CPUC Energy Division was recognized. Ms. Iklé stated her concern was regarding the issue of electrical safety and reliability and focuses upon the availability and reliability of Unit 2 during the coming summer months. She inquired whether the two episodes of cracking occurring in the Stator Cooling Water System were both due to vibration and she inquired whether the same issue might affect Unit 1. Mr. Harbor replied that the initial cracking issue concerned a hairline crack on the stator core cooling water ring and both the initial and the second occurrence [on a parallel but different ring] of hairline cracking were due to vibration and accordingly dampening the vibration is believed to be the key to resolving the issue. The counterweights installed on the side of the Unit 2 Main Generator are being tuned to dampen vibration and the additional blocking on installed on the parallel rings should dampen vibration in those areas. Mr. Harbor reported the Unit 1 Main Generator is of a different design than the Unit 2 Main Generator and accordingly the stator cooling water rings and the hydrogen cooling system on Unit 1 differ from those on Unit 2. The vibration signature for Unit 1 is also completely different as is its structural integrity and accordingly Mr. Harbor reported DCPD sees no translation of the events which have occurred on Unit 2 over to Unit 1.

In response to Dr. Lam's inquiry concerning whether PG&E would consider a subsequent replacement Mr. Harbor replied that PG&E believes the modifications put in place with the dampening weights have definitely worked to dampen vibration and it is expected the issue with the Unit 2 Main Generator will be completely resolved following 2R22. Dr. Peterson stated the issue with vibration should be covered in a future course on reliability engineering for mechanical engineers as high-cycle fatigue presents very interesting problems and he stated that it is fortunate mass can be used to change the frequency resonance. Dr. Budnitz observed DCPD structures and components have been analyzed for motion during seismic events including how energy propagates through a building and the building itself changes the frequency spectrum. He observed that as the Turbine Deck supports massive pieces of equipment and that fact needs to be accounted for in order to work out what the motions are for other nearby equipment and this can be done using in-structure spectrum analysis.

Mr. John Geesman representing the Alliance for Nuclear Responsibility was recognized. Mr. Geesman inquired as to what type of resonance evaluation was performed by DCPD prior to acceptance of the stator repair. Mr. Harbor stated he believed that the specific design criteria parameters were included in the contract for the work and were adequate and it is incumbent upon the vendor to meet those criteria. Mr. Harbor confirmed Dr. Budnitz' observation that the experts engaged by DCPD subsequently analyzed those criteria using a sophisticated 3-D model in the development of the modifications to dampen the vibration of the Unit 2 Main Generator. Mr. Harbor confirmed Dr. Lam's observation that in dealing with vibration on rotating equipment there are a great many dimensions to account for, including magnetic forces, and modeling may not be 100% accurate and in those situations there remains an element of trial and error concerning the placement of a mass used to dampen vibration.

Mr. Tom Marré was recognized. Mr. Marré observed that with installation of weights to provide mass on the Unit 2 Main Generator this may have an effect on the bearings within the generator. Dr. Peterson stated and Mr. Harbor agreed that the effect of adding the mass is not so

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much in dampening the vibration but rather in moving the frequency of the resonance of the vibration. Mr. Harbor stated that when Unit 2 came out of the outage, the bearings on the shaft, that drives from the turbine down into the generator rotor, were and continued to be monitored and no significant vibration on any of the bearings or on the rotating element were observed and that remains the case at this time. He stated the issue principally concerns the mass of the stator and the manner in which the main generator is anchored to the floor.

The Chair thanked Mr. Harbor for an informative and insightful presentation.

XIII TECHNICAL CONSULTANT REPORTS & RECEIVE, APPROVE, AND AUTHORIZE TRANSMITTAL OF FACT FINDING REPORTS TO PG&E

The Chair requested Consultant McWhorter to report on the January 13-14 and 21, 2021, fact-finding visit with Dr. Lam conducted remotely as a WebEx conference. He reviewed the topics discussed with PG&E during the January 13, 14 and 21, 2021, visit as follows:

➤ Unit 2 Main Generator Issues and Root Cause Evaluation Update – the Fact-Finding Team met with DCP's Manager of Performance Improvement Mr. Mark Frauenheim to receive an update on the Unit 2 Main Generator issues. Mr. McWhorter reviewed the events in connection with this matter and reported the generator was refurbished in the fall of 2019 and Unit 2 ran for several months. The first hydrogen leak indication occurred in July 2020 and Unit 2 entered forced outage 2Y22 which had a duration of approximately two weeks. The hydrogen leak was attributed to a cracked weld/quality issue. In hindsight Mr. McWhorter stated that it now appears the weld cracked due primarily to high cycle fatigue and vibration. Unit 2 was restarted on August 2, 2020. On October 15, 2020, a second hydrogen leak indication was discovered and Unit 2 entered forced outage 2Z22. The DCISC reviewed issues with the Unit 2 Main Generator hydrogen leakage during a fact-finding in November 2020 and additional weld cracking was noted. At this time, Mr. McWhorter stated, it began to be apparent there was a vibration issue. Corrections were made to the generator frame-to-floor weighting and additional instrumentation to monitor vibration was installed including approximately 25 instruments which were placed on the generator frame in various locations and connected to a data collection system. As of October 2020 a root cause evaluation (RCE) had been initiated but not yet closed and the RCE was expanded to include the participation of additional consultants. Unit 2 was restarted on November 28, 2020, with the RCE open and a plan to monitor vibration and take corrective action as needed. On December 2, 2020, the hydrogen leakage increased and Unit 2 entered 2G22, its third forced outage. The January 2021 fact-finding occurred as Unit 2 was in the process of restarting after 2G22.

Mr. McWhorter reported DCP made efforts to develop a finite element analysis and 3-D computer model of the generator frame which permits vibration to be introduced in the model at differing points to assess the effect on the generator frame. Mr. McWhorter explained the generator frame consists of the outside of the generator which is welded to form the frame and structure of the generator. Various models were run and it was found the frame had a natural resonance frequency at 120 hertz which Mr. McWhorter stated is a very significant frequency

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relative to an electrical generation occurring at 60 hertz which the Unit 2 generator was designed to produce. The generator rotor spins at 1,800 rpm which is a natural frequency of about 30 hertz. The Unit 2 Main Generator is a four-pole generator and produces 60 hertz electricity so he stated it is very natural that a 60 hertz generator could have a forcing function at 120 hertz that could stimulate the resonant vibration observed. Mr. McWhorter reported it is essentially the spinning rotor at 1,800 rpm that produces a very natural frequency that appears to be stimulating the external frame of the generator, with a fixed stator, at a resonant frequency of 120 hertz. He reported the model also showed larger vibration occurring at the ends of the generator, particular at the exciter end of the frame where most of the leaks have occurred. Additional work was also performed inside the generator to further examine the welds. Minor modifications were made inside the generator to reduce the vulnerabilities of welds to cracking due to vibration.

Mr. McWhorter reported twelve different possible design changes were considered and a decision was made with input from the vendor to install various combinations of weighted plates externally on the generator at six separate locations to allow for tuning and shifting of the generator's resonant frequency from 120 hertz to another frequency or to reduce it. Mr. McWhorter displayed a photo of the Unit 2 Main Generator showing the location of the weighted plates installed at three locations on each side of the generator with the monitoring equipment installed.

On January 12, 2021, Unit 2 was restarted and vibrations were measured at various loads and the weighted plates were adjusted several times and the generator frame vibration was reduced significantly. Data showed the vibration of the generator frame increased after refurbishment and decreased after installation of the weighted plates with vibration after installation being comparable to the vibration prior to the refurbishment. Mr. McWhorter commented there is a significant difference in the frames of the main electrical generators for Unit 1 and Unit 2 with the vendor having apparently made significant design changes to the generator construction between the times the two generators were built.

Mr. McWhorter reported the DCISC Fact-Finding Team found DCPD managed the forced outages properly and the ongoing response was appropriate. **The team was concerned about the findings of the RCE and recommended that the DCISC should continue to follow this issue in future fact-finding and during future public meetings.**

In response to Consultant Wardell's question Mr. McWhorter reported the DCISC representatives were not informed as to the timetable for a fourth shutdown, as on January 21, 2021, the initial installation of the weighted plates had just been completed and the Unit was at 100% power.

CPUC Branch Manager Ms. Judith Iklé was recognized. Ms. Iklé inquired as to the timing of the DCISC fact-finding and whether there has been any consideration of lowering the capacity of the generator. Mr. McWhorter replied that at the time of the DCISC's visit Unit 2 had just been restarted from its third forced outage and is now shutdown and in a fourth forced outage to make internal inspections and assessments of the work performed on issues related to vibration. Mr. Thomas Baldwin, PG&E Director of Generation Business Planning, responded that PG&E is

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still pursuing continued full operation for Unit 2. Measurements were taken of the vibration experienced as the unit changes power levels and the present shutdown was preplanned. Part of the preplanned shutdown was to gather extensive information on the vibration experienced as the unit shut down. Mr. Baldwin stated he was unaware at this time of any discussion concerning derating Unit 2 and PG&E believes the cause of the vibration will be successfully addressed and Unit 2 will be operable at 100% power for the rest of its operating license.

Mr. John Geesman representing the Alliance for Nuclear Responsibility was recognized. Mr. Geesman inquired whether there were any components of the Unit 2 Main Generator that would be considered seismically sensitive. Dr. Budnitz stated and Mr. Baldwin confirmed that in the event of a large seismic event this would result in a unit trip of the powerplant and the steam supply to the main generators would cease. Mr. Geesman inquired as to whether Unit 2's Main Generator is addressed in the plant's Technical Specifications and in that connection specifically related to derating the unit. Mr. McWhorter stated there are areas of the Technical Specification which address reactor trips that might be initiated from the generator system but he did not expect that the main generator would, in general, be addressed by the Technical Specifications. Mr. McWhorter stated he could not provide Mr. Geesman with any information as to the Technical Specifications including information on derating. Mr. Baldwin stated that if DCPD were to pursue a permanent derating that would require the NRC to engage in a review process under a 10 CFR 50.59 screening evaluation.

Ms. Jean Merrigan was recognized. Ms. Merrigan inquired whether the fourth forced outage on January 12, 2021, was correctly characterized as a planned outage and Mr. Baldwin responded that this was correct and the January 2021 outage was preplanned. In response to Ms. Merrigan's query DCPD Station Director Mr. Cary Harbor stated that the hydrogen leakage experienced prior to the outage that commenced on January 12, 2021, was not of sufficient magnitude that it would have otherwise required the plant to be shut down. He reported for the prior forced outages the hydrogen leakage surpassed procedural limitations and those procedures instructed the operators to shut down the unit. Mr. Harbor stated the hydrogen leakage experienced prior to the fourth shutdown was not at prior levels and the consistent hydrogen leakage was sustained at much lower levels. Mr. Harbor confirmed in response to Ms. Merrigan's query that the fourth outage was planned to occur in December 2020 but was delayed due to a request from the PG&E power trading organization.

➤ Institute of Nuclear Power Operations (INPO) Corporate Evaluation – Mr. McWhorter reported this evaluation is performed by INPO every six years and because of confidentiality agreements most details cannot be shared in public but he stated he could report certain appropriate corrective actions were taken in response to the INPO Corporate Evaluation and there were no significant safety concerns identified by INPO during the evaluation.

➤ Steam Generator Inspection Results – Mr. McWhorter reported the results reviewed by the DCISC representatives will be the last set of steam generator inspections for Unit 1. There were 12 new indications on the steam generator tube support plates and 4 new indications on anti-vibration bars none of which were large enough to require additional tube plugging. Structural evaluation found all indications to be acceptable for continued operation for three fuel cycles.

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Mr. McWhorter displayed a photo of a steam generator and described its component parts. A total of 8 tubes have been plugged in all four Unit 1 steam generators which Mr. McWhorter described as indicative of their excellent performance.

- Safety System Functional Failures – a safety system functional failure as defined by the NRC represents an event or condition that could have prevented the fulfillment of the safety function of a system. Mr. McWhorter reported DCPD has experienced a high number of such failures in the past but the plant's performance has improved. **DCISC fact-finding team found the overall reduction in safety system functional failure to be acceptable and recommended that the DCISC cease looking at this issue on a recurring basis and instead continue to review NRC Maintenance Rule functional failures and NRC Maintenance Rule performance in general.**
- Large Transformer Health – Mr. McWhorter reported there are 14 large transformers at DCPD which are generally used to transfer high voltage down to medium voltage. He reported all large transformers are in good health and are monitored regularly during outages and while the plant is on line. Mr. McWhorter reported the only major project remaining for a large transformer prior to cessation of operations is the replacement of the radiator on Auxiliary Transformer 2-1.
- Meeting with NRC Senior Resident Inspector – the DCISC representatives met with the Senior NRC Resident Inspector to discuss outage performance.
- Meeting with DCPD Officer - Dr. Lam met with DCPD Site Vice President Ms. Paula Gerfen to review the schedule for the Unit 2 Main Generator repairs and the matter of a financial impact due to the extended outages and repeated shut downs.
- Licensed Operator Training Class Observation – Mr. McWhorter reported licensed operators spend approximately every fifth week in training which consists of their training in the Simulator facility and in the classroom. Due to COVID-19 pandemic protocols classroom training is being conducted remotely. The DCISC representatives sat in on a two-hour training presentation on abnormal operating procedures including Control Room evacuation procedures. Mr. McWhorter reported the training was well prepared, excellently performed and professionally presented. He stated that video was not used in the training and the class was conducted only in audio mode in order to preserve internet bandwidth for the participants. Mr. McWhorter noted that this was an example of the limitations imposed by the response to coronavirus pandemic.
- Low Temperature Over-pressurization Protection (LTOP) System Event – Mr. McWhorter stated the LTOP System is a control system which is activated when the plant is shut down and at low temperature to protect the reactor vessel against brittle fracture. At low temperature the vessel if subjected to too high a pressure could fracture. The LTOP System actuates the power-operated relief valves (PORV) on the Pressurizer to relieve pressure if needed at low temperature. During a "water solid" reactor coolant pump (RCP) start on October 29, 2020, two pumps successfully started but two other pumps experienced issues. Operators "drew a bubble" in the Pressurizer. It was then determined that one of the RCPs needed to be slow-rolled to move the pump at low

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speed and when the pump was started a pressure transient in the system actuated the LTOP System. Mr. McWhorter reported the operators responded promptly within two second to maximize the let-down flow and recover pressure control. Mr. McWhorter reported the root cause evaluation investigation was still in progress at the time of the fact-finding but there are really only two ways this event could have occurred, either by injecting water in the Reactor Coolant System (RCS) when the system is water solid or a source was present which heated the RCS. Mr. McWhorter stated it has been confirmed that there was no water injection taking place at the time of the LTOP System actuation so it appears that somehow starting the RCP allowed more heat to be transferred in the RCS than is typical. DCPD has retained the services of Westinghouse, the vendor, to model the thermal situation and assist with further analysis. **The DCISC representatives concluded the plant's response to this event was appropriate but the DCISC should review this event when the root cause evaluation is completed.** In response to Dr. Budnitz' query Mr. McWhorter stated there have been other LTOP System events within the industry but the LTOP systems are only designed for a certain number of actuations during the life of a plant so events are infrequent. Dr. Budnitz observed he suspected there would be some evidence found of asymmetrical heating.

- Chemical and Volume Control System (CVCS) and Emergency Core Cooling System (ECCS) – Mr. McWhorter reported the DCISC representatives conducted a routine review of these two systems. The CVCS includes two high-head safety injection pumps and the Fact-Finding Team also discussed the Safety Injection System which includes two pumps, four accumulators and the residual heat removal pumps used for low-head safety injection. He reported with this review the DCISC has now had an opportunity to review the health of all six pumps and four accumulators within the ECCS. Mr. McWhorter reported all these Tier 1 systems receive formal health reports and all were classified as being in Green health status with only minor issues being tracked. Mr. McWhorter reported testing of the ECCS is a large part of safeguards testing performed for every outage.
- Control Room Ventilation Systems – the Control Room Ventilation System includes heating, cooling and pressurization systems for the shared Main Control Room and adjacent areas. The system also serves to protect operators from radiation by pressurizing the Control Room with filtered air to keep radioactive gaseous radioactivity out of the Control Room. Mr. McWhorter reported the system was generally in good health but there are some reliability issues with dampers which will continue to be monitored.
- COVID-19 Pandemic Response -Mr. McWhorter reported DCPD continues to be effectively focused primarily upon self-screening, social distancing, hygiene and limiting the number of personnel on the site. The DCISC representatives also reviewed plans for vaccinating plant personnel who will be divided into four priority groups and this effort will be coordinated with San Luis Obispo County. He reported the response by the station to the pandemic continues to be effective.
- Learning Services Department Update -Mr. McWhorter reported the reaccreditation of all twelve training programs during 2020 was a significant accomplishment for the Learning Services

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Department, together with a 100% pass rate for the last two initial operator training classes during 2019. The final class which is also the largest in DCPD history has now finished examinations and is awaiting results. Mr. McWhorter reported the Learning Services Department has approximately 45 persons on its training staff and personnel continue to be moved to other programs as training needs are reduced as the plant approaches the end of its operational life. Mr. McWhorter reported the Learning Services Department is appropriately focused on future challenges.

Dr. Lam thanked Mr. McWhorter for an excellent and expedient report.

Following a motion by Dr. Peterson seconded by Dr. Budnitz the January 13, 14 and 21, 2021 Fact Finding Report was accepted by the Committee.

XV ADJOURN AFTERNOON MEETING

The Chair observed the evening meeting of the Committee would be convened at 5:30 P.M. and he adjourned the afternoon meeting of the Committee at 5:20 P.M.

XVI RECONVENE FOR EVENING MEETING

Dr. Lam reconvened the evening meeting of the DCISC at 5:30 P.M.

XVII COMMITTEE MEMBER COMMENTS

Dr. Budnitz commended Mr. McWhorter for his report made during the afternoon session. Mr. McWhorter expressed his appreciation to PG&E and to Mr. Mark Frauenheim at DCPD for Mr. Frauenheim's assistance with the Committee's inquiries concerning issues with the Unit 2 Man Generator repairs.

XVIII PUBLIC COMMENTS AND COMMUNICATIONS

Dr. Lam invited members of the public to address the Committee on matters not on the agenda for this meeting. There was no response to his invitation.

XIX INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

Mr. Baldwin introduced Director of Nuclear Security Services and Emergency Services Mr. Shawn Kirven to make the next informational presentation to the DCISC. Mr. Baldwin reported Mr. Kirven has more than 34 years of nuclear industry experience including experience with both contract and proprietary nuclear companies as well as a long tenure with PG&E including within the Security Department, the DCPD Fire Department and an oversight role at PG&E's Humboldt Bay Power Plant's Independent Spent Fuel Storage Installation (ISFSI). Mr. Kiren holds a Bachelor's Degree in Management and an Associate's Degree in Criminal Justice and is affiliated with local and federal law enforcement agencies.

History of Drone Sightings at Diablo Canyon and Implications Upon Nuclear Safety.

Mr. Kirven reported that in 2014, in response to the sighting of a drone above the Indian Point Energy Center in New York, the NRC enhanced its existing advisories on suspicious aircraft and established voluntary reporting guidelines. Suspicious aircraft including drones are

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categorized as unmanned aerial systems (UAS) and unmanned aerial vehicles (UAV). Guidance included contacting the Federal Aviation Administration (FAA), local law enforcement and NRC Headquarters. Mr. Kirven remarked that the use of drones by the nuclear plants themselves is not included within the guidance and many plants including DCPD use drones to conduct inspections of power transmission lines and plant structures.

Mr. Kirven stated the NRC believes there are no risk significant vulnerabilities at nuclear power plants that could be exploited by adversarial use of currently available commercial drones. He reported that working with the Nuclear Energy Institute (NEI) the NRC has concluded nuclear plants remain safe from drones as the plants are among the most robust structures in the nation, they employ comprehensive defense strategies and these are thoroughly tested even against drones, the plants are protected from cyberattacks and a unified industry response is already in place. In response to Dr. Lam's query Mr. Kirven reported these considerations apply to the ISFSIs as well as to the power plants. He reported DCPD recently received a restricted air space designation from the FAA and such designation was previously not in place at any nuclear power plant in the country. This airspace restriction includes drones and covers the area of the ISFSI at DCPD.

Mr. Kirven reported prior to 2014 when the NRC put its guidance in place the nuclear industry through the NEI had formed a task force, of which DCPD is a member, under the auspices of the of the Department of Homeland Security's Critical Infrastructure Partnership Advisory Council on Unmanned Aircraft Systems (CIPAC UAS) to identify risk and develop solutions. As a result all U.S. nuclear power plants now have protocols and standards in place to respond promptly to suspicious aircraft activity including reporting to the FAA, local law enforcement, the FBI and the NRC. He reported the details of these protocols and standards are security related information and therefore cannot be publicly shared.

Mr. Kirven reported FAA rulemaking initially prevented DCPD from taking any action against a drone, as without FAA sanction there can be no interference with the flight of an aircraft, manned or unmanned. DCPD worked with the Department of Energy (DOE) to obtain federal sponsorship for nuclear power plants to request restricted airspace under "special security instructions" and the DOE approved this sponsorship in September 2019. DCPD volunteered to be a pilot plant, working through with the appropriate agencies, in order to be granted airspace restrictions and in October 2020 DCPD was granted that permanent designation. In response to Dr. Peterson's query Mr. Kirven replied that it is his understanding that this designation which includes the DCPD ISFSI will remain in place after DCPD ceases to generate electricity. Dr. Peterson observed although the DCISC's Charter from the CPUC does not include issues related to security there is a great deal of interest in the local community on this topic and removing the restricted airspace designation after cessation of power generation operations would not seem logical.

Dr. Budnitz observed that after the 9-11-2001 terrorist attacks every nuclear plant in the nation was required to assess the effect of a large aircraft's impact on the plant's facilities and structures and the NRC assembled a task force to understand the issue. While the results of that inquiry remain security-related information Dr. Budnitz reported the general conclusion was that

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nuclear plants would be adequately safe. Analyses were also performed by other countries including concerning containment structures and with some exceptions these structures were found to be sufficiently robust. Dr. Budnitz remarked that as a drone has much less mass and travels at a lesser velocity than a large aircraft with massive engines, while a drone may pose a threat to off-site power lines nuclear power plants are designed for the loss of off-site power. He stated that in his opinion drones do not present a threat outside of the envelope of matters which have been reviewed and assessed regarding the operation of nuclear power plants. Mr. Kirven agreed with Dr. Budnitz' assessment and observed that nuclear security is required to stay ahead of technological developments which often evolve faster than legislation. Mr. Kirven reported other nuclear power plants including the Palo Verde Nuclear Generating Station in Arizona have been in communication with DCPD concerning obtaining airspace restrictions for their facilities.

Mr. John Geesman representing the Alliance for Nuclear Responsibility was recognized. On behalf of the Alliance for Nuclear Responsibility Mr. Geesman complimented PG&E for its leadership on the issue of restricted airspace for nuclear power plants and Mr. Geesman stated he hoped that others in the industry will follow PG&E's leadership. Mr. Kirven thanked Mr. Geesman for his comment and stated he was proud of the team and the work accomplished in securing FAA airspace restriction designation for DCPD.

The Chair thanked Mr. Kirven for his presentation.

Mr. Baldwin introduced the Manager of the DCPD Chemistry Department Mr. David Cortina. Mr. Baldwin reported Mr. Cortina has more than 30 years' experience with PG&E in both the Chemistry and Radiation Protection Departments and came to DCPD from the U.S. Navy. Mr. Cortina holds a Bachelor's Degree in Nuclear Technology from the University of the State of New York Regents College and a Master's Degree in Business Administration from the University of La Verne.

Monitoring and Reporting of Radiological Effluent Releases and Radiological Environmental Impacts.

Mr. Cortina reported commitments for radiological monitoring are tied to the Generation organization's Operating Plan and the DCPD Chemistry and Radiation Protection organizations are committed to meeting all regulatory standards regarding radiological nuclear safety, to following procedures, and to raise identified concerns or challenges which could prevent the plant from meeting its commitments. He stated DCPD maintains the Radiological Monitoring and Controls Program (RMCP) in conformance with applicable federal regulations, the Technical Specifications and in accordance with ALARA (As Low As Reasonably Achievable) principles.

Mr. Cortina stated the RMCP is comprised of: Radioactive Effluent Control Program (RECP), which controls radioactive material released from the plant and the resulting dose to individuals or principal pathways of exposure, and Radiological Environmental Monitoring Programs (REMP) which ensures concentrations in the environment from radioactive effluent releases conform to the reasonably achievable design objectives of 10 CFR Part 50 Appendix I.

Mr. Cortina discussed and described the RECP which consists of:

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- Monitoring requirements for potential release paths.
- Periodic sampling of systems with the potential of becoming radioactively contaminated.
- Procedures to control potential liquid and gaseous radioactive discharges.
- On-site meteorological program for the performance of dose assessments.
- Radioactive liquid and gaseous monitoring instrumentation.
- Liquid and gaseous effluents limits per 10 CFR Part 20, Appendix B.
- Annual and quarterly doses or dose commitment limits from effluents released per 10 CFR Part, Appendix I.

He then described the REMP which provides for:

- Monitoring the radiation and radionuclides in the environs of the plant by the use of thermoluminescent dosimeters (TLDs).
- Air and environment sampling.
- A land census to identify changes in use of areas at and beyond the site boundary.
- Complying with the plant's Technical Specifications..

Mr. Cortina reported DCPD submitted its 2019 Annual Radioactive Effluent Release Report (ARERR) and the 2019 Annual Radiological Environmental Operating Report (AREOR) to the NRC in April 2020. In all cases for 2019 the impact of DCPD operations were well below federal approved limits for the year. For 2020 the annual reports are in progress and are due on or before May 1, 2021. Mr. Cortina reported concerning those reports there are no identified challenges he remarked this reflects the plant's focus on safety. He reported DCPD is in full compliance with industry guidance and all regulatory standards regarding radiological and nuclear safety. Mr. Cortina reviewed the annual amounts of radiation which individuals experience from common sources as follows:

	Millirems
Average annual radiation exposure from all sources	624
Natural background radiation	311
Medical procedures	300
Consumer products (air travel, smoking, building materials, etc.)	13
Remainder (including living near a nuclear power station)	Less than 1

Mr. Cortina stated that less than 1 millirem is equivalent to the cosmic radiation exposure an individual would experience during one or two hours of a cross-country flight. He displayed a graph depicting different radiation sources and observed that the dose from effluents from the operation of a nuclear power plant is very low compared to other commonly encountered sources of radiation.

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Mr. Cortina reported the dose from liquid effluents during 2019 to the total body of hypothetical person at the site boundary from all liquid effluents, as reported to the NRC as a percent of Technical Specifications limits, as reported in the ARERR were 0.000031 millirem per year which is 0.0001% of the Technical Specification limit. He stated the site boundary location used in this calculation is located approximately 800 yards from the plant. He provided a graph showing a three-year summary of liquid releases which he described as well controlled and maintained in accordance with ALARA principles. He reported 2019 was a year in which the plant conducted two refueling outages and this resulted in an increase in total activity from that during 2018 and 2017 for both total body dose, excluding tritium, and for dose from tritium but levels for both remained well within Technical Specification limits.

Mr. Cortina reported dose from gaseous effluents during 2019 to a hypothetical person at the site boundary from noble gas or dose from iodine, particulate, and tritium to the nearest actual resident located, located northwest of the power plant at a distance of 3.6 miles, was significantly less than 1% of the Technical Specification limit.

Mr. Cortina reported on the direct radiation dose to personnel during 2019 who were located on the site at the Make-up Water Facility from direct radiation from noble gas was 0.0016 millirem per year or .016% of the Technical Specification limit and the iodine, particulate and tritium dose to the nearest resident during 2019 was 0.00034 millirem per year which was 0.0023% of the Technical Specification limit which compares to the average dose a person experienced annually of 624 millirem. He provided a graph showing a three-year summary of gaseous releases and observed there were no detectable releases from iodine during the past three years. He reported the gamma air dose and beta air dose were calculated at the northwest site boundary, while total body dose was calculated for a full-time resident residing 3.6 miles from the site. All gaseous releases were well below Technical Specification limits and consistent with ALARA principles.

Dr. Peterson observed liquid effluent releases for tritium were approximately 2 curies per year with gaseous releases much less, at approximately 70-80 millirem per year. Dr. Peterson observed keeping gaseous effluents low relative to liquid is logical as a gaseous release is more likely to cause off-site exposure but he stated he was curious as to the large differences described by Mr. Cortina in his presentation. In response Mr. Cortina stated that DCPD does not reprocess water as is done by some other nuclear power plants and the water is discharged by DCPD so ion exchange of tritium is not possible. Dr. Peterson remarked and Mr. Cortina concurred that evaporation from the spent fuel pools is the primary contributor to the gaseous component of tritium released and tritium production through liquid and gaseous sources is similar with differences being due to the discharge of the liquid effluent. Dr. Peterson observed that due to very low levels of actual effluent the public health consequences are very small and much less than when compared to the operation of a natural gas power plant. Dr. Budnitz remarked and Dr. Peterson and Mr. Cortina agreed that the total body dose of 2×10^{-3} millirem per year at the site boundary is very small and approximately equivalent to being in an aircraft flying across the county for approximately one minute and he opined while it is important to keep dose low this is too low to be of consequence.

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Mr. Cortina reported while no persons reside at the site boundary there are personnel who work at the Makeup Water Facility and the dose from direct radiation for those persons was calculated at 4.5 millirem per year which is approximately 18% of the 40 CFR Part 190 limit and this calculation was performed to demonstrate what the upper limit would be for any member of the public. Mr. Cortina reported the source for that direct radiation comes from the presence of Warehouse "A," a storage site for reactive materials, the ISFSI and from the on-site storage of spent fuel in storage casks, and from the storage facility for the old steam generators. Mr. Cortina reported that as a radiation worker he is subject to the federal limit of 5,000 millirem although the administrative limit at DCPD is lower. Dr. Peterson observed that the dose described by Mr. Cortina would in Dr. Peterson's experience be undetectable from background radiation and could not be measured.

Mr. Cortina stated that thermoluminescent dosimeters (TLDs) capable of measuring direct ambient radiation are in place in and around the plant and are continuously measured at 32 locations surrounding DCPD. These 32 locations are made up of 29 indicator stations and 3 control stations. Three TLD badges are placed at each location and each badge has three detectors to provide an average dose at each location and the data is collected and read every calendar quarter. Mr. Cortina stated that over a one-year period 1,330 TLD measurements are collected and the results are trended and compared with preoperational and historical operating values to look for adverse trends with no adverse trends noted for 2019. Dr. Peterson observed and Mr. Cortina concurred that one can conclude that relative to the natural background there is no statistically detectable change in radiation levels since the commencement of operations by DCPD consistent with dose being down to less than 2% of natural background which can vary from location to location within only a short distance. Mr. Cortina provided a photo of an air sampling station and its equipment and reported 364 air samples were collected in 2019 and 884 radionuclide analyses were performed and he showed a photo of personnel involved in environmental sampling. He reported no DCPD-related radionuclides were detected in:

- Drinking water samples
- Ocean surface water samples
- Marine Biological samples
- Marine Aquatic Vegetation
- Recreational Beach Sampling
- Vegetation (Food Crops)
- Milk
- Meat Products

Mr. Cortina stated that at the end of 2019 a total of 58 spent fuel storage casks were located within the DCPD ISFSI. Eight TLD locations surround the ISFSI in addition to the 32 TLDs he discussed earlier. Data has indicated that ISFSI loading campaigns have not affected the TLD direct radiation trending results with respect to the 32 locations surrounding DCPD.

Mr. Cortina reported personnel involved in direct implementation of chemistry/radiochemistry, operations or radiation protection activities in support of the

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Radiological Monitoring and Controls Program are qualified in accordance with the requirements. Instrument performance is monitored and quality is controlled by the Chemistry Lab Quality Control Program in accordance with strict requirements to conduct testing, calibration and quality control checks. Analytical confidence is assessed by replicating and technical sampling programs and REMP split sampling which is sent to the California Department of Public Health - Radiologic Health Branch. Off-site labs are audited and participate in an interlaboratory comparison program.

Mr. Cortina concluded his presentation by observing the radiological impacts of DCP's operations are well below federal approved limits. This has been confirmed by environmental sampling around the plant indicating no unusual environmental isotopic findings from DCP site operations with results compared to preoperational data which show no unusual trends.

In response to Dr. Lam's inquiry Mr. Cortina confirmed that in almost 40 years of operation DCP has not experienced a radiological release which would be considered to approach the level of a major release. Consultant Wardell observed the Committee reviews the radiological release reports each year and all releases reported have been extremely small and sampling has shown nothing as far as radioactivity impact which Mr. Wardell described as an impressive performance.

Ms. Jane Swanson of San Luis Obispo Mothers for Peace was recognized. Ms. Swanson inquired whether the previous status of not having a "no fly" zone situated above DCP reported by Mr. Kirven had now been changed. Dr. Budnitz replied and confirmed that for approximately one year an airspace restriction by the FAA has been in place for the airspace above DCP. Ms. Swanson remarked that the NRC's use of a "reference man" proxy as a theoretical model for the effects of exposure to ionizing radiation has been called into question by a research project known as the Gender and Radiation Impact Project conducted by Ms. Mary Olson of the Nuclear Information and Research Service. Ms. Swanson reported Ms. Olson's research compares the effects of radiation on female persons to that of males and Ms. Swanson stated the effect is much greater on female persons than on males. Ms. Swanson stated Mr. Cortina did a great job in his presentation but she stated her view that a general statement that exposure to persons working at DCP is within NRC limits may not be accurate as that conclusion should not be necessarily applied to female persons. Mr. Rathie reported and Ms. Swanson confirmed that information is available on the San Luis Obispo Mothers for Peace website at www.mothersforpeace.org and the group is hosting a Zoom meeting with Ms. Olson on March 11, 2021. Mr. Rathie thanked Ms. Swanson for Mothers for Peace having provided notice of this public meeting of the DCISC on its website. Ms. Swanson stated that Mothers for Peace finds the public meetings of the DCISC to be extremely valuable including the opportunities provided to ask questions and the ability to receive written information. Mr. Cortina remarked that he and his wife have two daughters and he is concerned about their health as well as of those in the community. Mr. Cortina observed the concepts of ALARA are principal drivers in keeping exposure well below federal limits for both women and men. Ms. Swanson stated she drives no reassurance based upon the concept of ALARA as the message she takes from ALARA principles is that it cannot be done right so it will be done to the best of our ability and she stated that she expects more than an adequate assurance

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of public safety. She acknowledged DCPD appears to be achieving all the standards set by federal regulations but she has a fundamental disagreement with the adequacy of those standards.

Dr. Budnitz called the attention of the other Members, Technical Consultants and Counsel to an email received from Mr. David Weisman of the Alliance for Nuclear Responsibility which had an attachment with a document by Mr. David Lochbaum regarding the NRC issuance of a Green finding concerning drain-down issue due to a closed valve discussed during this public meeting. The Chair observed the receipt of the email is noted and it will become a part of the DCISC's public record.

Dr. Lam reported the Committee will reconvene at 9:00 A.M. on the following day.

XX ADJOURN EVENING MEETING

The Chair adjourned the evening meeting of the Committee at 6:55 P.M.

XXI RECONVENE FOR MORNING MEETING

The February 17, 2021, public meeting of the Diablo Canyon Independent Safety Committee was called to order by its Chair, Dr. Peter Lam at 9:00 A.M. Dr. Lam welcomed those persons attending the Zoom Webinar and watching the proceedings on live streaming video.

XXII COMMITTEE MEMBER COMMENTS

There were no comments by Members of the Committee at this time.

XXIII PUBLIC COMMENTS AND COMMUNICATION

The Chair reviewed the invitation to address remarks to the Committee on matters not on the agenda for this public meeting and invited any comments from members of the public who wished to address the Committee to do so now. There were no remarks by any members of the public at this time.

XXIV INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

The Chair requested Mr. Baldwin to introduce the next presenter. Mr. Baldwin introduced Mr. Shane Guess of the Generation Business Planning team and reported Mr. Guess, who has been with PG&E for eighteen years, currently holds a Senior Reactor Operator License and holds a Bachelor's of Science Degree in Nuclear Engineering from the University of California at Berkeley and a Master's Degree in Business Administration from the University of La Verne.

Results of the 2020 Operating Plan and Key Elements of the 2021 Operating Plan.

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Mr. Guess stated the Operating Plan is the Generation organization's line of sight to providing safe, reliable and affordable energy to PG&E's customers and encompasses all three groups which make up the Generation organization as reorganized in 2019, including the Nuclear Generation, Power Generation and Business and Technical Services groups. He reported the Operating Plan process includes alignment of Generation's goals with those of PG&E and in doing so eight major categories were established as focus areas for the 2021 Operating Plan. In response to Dr. Lam's inquiry Mr. Guess replied that safety is the highest priority, with reliability a second priority and affordability focusing on PG&E's customers a third priority. Dr. Budnitz observed that a principal reason for the formation of the DCISC was a concern that PG&E would allow financial considerations to impede its focus on safety and that concern has always remained at the forefront of the DCISC's principal focus.

Mr. Guess reported on and discussed some of the results of the 2020 Operating Plan as follows:

- DCPD completed 1R22 safely and on schedule, meeting all goals for safety, reliability, schedule and budget.
- DCPD's performance on the NRC's performance metrics places DCPD in the highest performance category, Column 1 of the NRC's Licensee Response metric. There were four violations identified during 2020 compared to eight in 2019 and this represents the lowest annual total since 2016.
- DCPD established robust safety standards for COVID-19 prevention including working remotely where possible, restricting travel, requiring face coverings and sanitizing work spaces which has resulted in no incidents of workplace transmission of COVID-19.
- DCPD has maintained a skilled, proficient workforce during the Tier 1 four-year employee retention period and is now in the process of monitoring progress on the Tier 2 three-year employee retention period to identify any signs of decline or issues concerning a lack of qualified personnel.

Mr. Guess reported on measurable results of the 2020 Operating Plan as follows:

Metric	Goal	Actual
Reliability & Safety Indicator	95.0	92.5
1R22 Outage Radiation Exposure	<30.5 rem	26.7 rem
Preventable Motor Vehicle Accidents	1 st quartile	1 st quartile
Days Away, Restricted or Transferred Cases	1 st quartile	1 st quartile
Lost Work Day Cases	1 st quartile	1 st quartile

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Regulatory Findings
NRC Reactor oversight Process

No Significant
Column 1 w/
cross-cutting issues

No Significant
Column 1 w/
cross-cutting issues

Mr. Guess stated DCP's failure to meet the goal set for the Reliability & Safety Indicator which combines industrial safety, radiological safety, nuclear fuel reliability and chemistry performance was due to the Unit 2 Main Generator vibration issues which resulted in Unit 2 being off line for unplanned maintenance activities. In response to Dr. Lam's inquiry Mr. Guess confirmed that a weighted factor is assigned to the components of this indicator.

Mr. Guess displayed a depiction of the 2021-2025 Generation Operating Plan which he stated is a published document distributed to the entire plant staff and the entire Generation organization. **Dr. Budnitz inquired and Mr. Guess promised to check to determine if a copy of the 2021-2025 Generation Operating Plan could be made available for posting on the DCISC's website.** Mr. Guess displayed a graph depicting the line of sight focus areas, cultural statements and the individual actions which he stated provide the line of sight he described to Generation excellence.

Mr. Guess described and discussed the eight key focus areas in the 2021 Generation Operating Plan including:

- Safety – employing principles of speaking up, listening up and following up to engage both employees and leadership in the field to eliminate barriers and to ensure incidents are reviewed to prevent a recurrence.
- People – fostering a safety culture through an engaged and involved workforce including through use of the Generation People Committee and the Pathways Program.
- Customer – focusing on proper planning and execution to improve reliability and affordability while never compromising on safety. Mr. Guess confirmed Dr. Budnitz' observation that the customer in this respect is the electrical grid as well as customers who receive electrical service and both those components are integrated into the customer focus area. In response to Dr. Lam's query Mr. Guess stated there is a separate focus area for budget issues which includes goals and metrics developed for dollars-per-megawatt of generation and Mr. Guess confirmed DCP is subject to and allowed an authorized rate of return under the CPUC as established by its general rate cases. Mr. Baldwin stated affordability is not an element of the customer focus area as the category is entirely focused on reliability including acknowledging that equipment failure can challenge reliability which can challenge the customer's experience. Mr. Baldwin stated PG&E recognizes its obligation to live within performance and cost metrics as determined by its general rate cases.

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Dr. Peterson observed that at this time Texas is experiencing many electrical black-outs and the South Texas Nuclear Generating Station (the “South Texas Project”) has experienced a unit trip due to frozen feedwater lines. **Dr. Peterson inquired whether DCPD would be reviewing Texas’ experience for issues which could potentially impact DCPD.** Mr. Guess replied that the South Texas Project reactor trip is believed to be related to the very low temperatures experienced which exceeded the plant’s design basis and he agreed that an extent of condition review may be appropriate. Mr. Guess remarked PG&E does have a climate resiliency organization which reviews issues concerning floods, heatwaves and issues involving wildfires. Mr. Baldwin commented the heatwaves experienced in California during 2019 did cause power shortages and as a result the PG&E Generation organization is reviewing plans and strategies for the peak demand summer season and is shifting some plans with regards to maintenance and refueling outages to ensure DCPD will be available to provide reliable service to PG&E’s customers. Dr. Peterson remarked these issues arise due to the progressive destabilization of the jet stream and the polar vortex, accompanied by ingestion of massive amounts of warm air and the emission of methane up through Siberia which accelerates heating and Dr. Peterson stated severe weather events are to be expected and will become increasingly frequent as the driving factor is carbon dioxide in the atmosphere and it is therefore necessary to assess what this implies around electrical supply and reliability.

- Relentless Execution – to leverage safety culture and leadership and to take advantage of external review organizations such as the Diablo Canyon Independent Safety Committee and the Nuclear Safety Oversight Committee.
- Wildfire Mitigation – ensuring issues are resolved in a timely manner to leverage the nuclear experience in assisting the other parts of the PG&E organization meet the Generation organization’s goal of effectively mitigating for wildfire. In response to Dr. Lam’s observation concerning the replacement of very old equipment and tree trimming Mr. Guess replied that the Electric Operations organization is committed to achieving an International Organization for Standardization (ISO) 550001 asset management certification and DCPD is assisting in that effort.
- Risk-Informed Work & Resource Plan – to develop risk-informed work and resource plans. Mr. Guess observed the Nuclear Generation organization assists in the use of risk evaluation methodology on a case by case basis but risk evaluation methodology is not integrated into the Electric Operations organization.
- Commitments – includes maintaining regulatory performance and documenting areas for improvement through the Corrective Action Program which Mr. Guess reported is important across the Generation organization including for the Business and Technical Services group.
- Financial Stability – to complete the business unit work plan within 2% of the budget

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established while meeting goals and choosing projects on a priority basis and following through and monitoring budget performance. Mr. Guess remarked that assessing whether a better way exists is something that is intrinsic to nuclear safety culture.

Mr. Guess stated the leadership model at DCPD employs concepts of engaging, enabling and sustaining each employee to be successful in achieving a high level of performance and to encourage each person to act swiftly if performance declines or a gap to a standard is identified. He reported on the key work projects and initiatives under the 2021 Operating Plan which include:

- Maintaining 1st quartile safety performance as the number one priority.
- Executing one refueling outage (2R22) in mid-March 2021.
- Planning and preparing for two refueling outages in 2022.
- Monitoring the first year of Tier 2 retention period for DCPD employees.
- Pathways Program, Phase 2 (“Building Your Pathway”) ensuring DCPD employees have skills and knowledge to enable them to succeed at the end of DCPD generation operations whether that is within the Decommissioning organization, elsewhere within PG&E, at another nuclear facility or in retirement. Programs have been established at Cal Poly to enable employees to obtain professional certifications.
- Nuclear Regulatory Commission evaluated emergency planning exercise scheduled for September 15, 2021.
- Last initial operator license class which Mr. Guess stated would free up some instructors in the Operations training department who maintain licenses as senior reactor operators to ensure that the minimum number of licensed operators is met at all times.

In response to Dr. Lam’s inquiry Mr. Guess stated that he did not have statistics on what percentage of DCPD employees may choose to retire following DCPD’s cessation of generation operations. He reported there may be more interest among employees in joining the Decommissioning organization than that organization can accommodate and employees are also exploring other areas in the Generation organization as many employees have expressed their wish to continue employment with PG&E and a strong interest remains in staying in the local area.

In response to Consultant Wardell’s question Mr. Guess replied each employee has access to a pdf file containing the Operating Plan and elements from the plan are incorporated in the Site Standards Handbook and the individual goals to achieve line of sight to generation excellence and employee performance are tied to and assessed against specific goals and metrics in the Plan. In response to Consultant Wardell’s inquiry concerning the Station Excellence Action Plan Mr. Guess replied that plan is designed to ensure any gaps to excellence are identified and the plan is distributed to different departments in the form of Departmental Excellence Action Plans. He described the Operating Plan as ranking above the Departmental Excellence Action Plans in the Generation organization’s planning hierarchy.

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Dr. Budnitz observed, and Mr. Guess agreed that in Mr. Guess' presentation Mr. Guess had described the highest level policy stance of the company but these descriptions alone while important are not informative as to how the plan is performing and as such the Operating Plan is important but it is not sufficient in itself. Dr. Budnitz observed the fundamental mission of the DCISC has been to dig down and to see how such plans are working and how their details are being implemented.

Ms. Sherry Lewis of San Luis Obispo Mothers for Peace was recognized. Mr. Lewis stated she very much appreciated Dr. Budnitz' remark as she finds presentations such as Mr. Guess made to be irritating because while saying all the right things it is not known whether any of the concepts described are being followed. She observed that as long as people take these high level policies seriously and follow through then they are beneficial but otherwise they can represent just a list of high aspirations.

Mr. Baldwin introduced DCPD Director of Risk and Compliance Mr. Russ Prentice,. Mr. Prentice made a presentation to the DCISC during the afternoon session of this DCISC public meeting held the previous day.

Causes and Corrective Actions for the Unit 2 Auxiliary Feedwater System Leak that Occurred During Shutdown in July and Actions Taken to Inspect Unit 1 for Similar Issues.

Mr. Prentice stated in his presentation he would discuss the root cause for the Auxiliary Feedwater (AFW) System leak and what was discovered during the root cause evaluation of that event including the cause, contributing organizational factors and actions taken in response. He reported the AFW System is a Class 1, safety-related system that supplies an alternate source of feedwater to the steam generators when normal feedwater is unavailable. The design basis of the AFW System is to supply water to the steam generator in a minimum required flow rate corresponding to steam generator pressure to prevent over-pressurization.

Mr. Prentice reported the process of conducting a root cause analysis involves defining the object of the analysis, accurately identifying the defect in question and the consequences of the defect and ensuring that corrective actions are appropriately focused. He explained the object of the AFW System root cause analysis involved the Unit 2 AFW System piping at a piping elbow downstream of Steam Generator 2-2 AFW Control Valve. The defect involved an approximate 1/16-inch diameter hole in the pipe which resulted in a calculated 3.9 gallon-per-minute leak. As a consequence two trains⁹ of the AFW System were declared inoperable on July 24, 2020, per Technical Specifications which required a mode transition to Mode 4. Unit 2 was in Mode 3 at the time of the discovery of the leak. In response to Dr. Budnitz' request Mr. Prentice stated Mode 3 is entered when the Reactor Coolant System temperature is greater than 350 degrees Fahrenheit

⁹ "Train" means one of at least two independent channels of operability in a single system.

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but the reactor is not critical¹⁰, while Mode 4 is entered with the reactor temperature greater than 200 degrees Fahrenheit again with the reactor not critical. In response to Consultant McWhorter's query Mr. Prentice confirmed that only Steam Generator 2-2 was impacted by the leak which was on a common feedline from two auxiliary feedwater pumps.

Mr. Prentice reported a root cause evaluation (RCE) was conducted to address this problem. He described the root cause process as a formal investigation that uses industry accepted analysis methods to determine the root cause or causes of a problem with the goal of identifying not only the direct cause but also any organizational aspects.

Mr. Prentice summarized the event and stated on July 23, 2020, during shift operator rounds at 11:00 a.m. personnel assigned to the Unit 2 Turbine watch noticed water coming down from the Unit 2 AFW pipe rack and leaking out from under the insulation covering the pipe elbow just downstream of the Steam Generator 2-2 AFW control valve. Maintenance removed the insulation and a 1/16-inch diameter hole was revealed. At the time of discovery Unit 2 was shut down in Mode 3 with the AFW System in service feeding the steam generators with 10% steam dumps with pressure in the system at that time of approximately 1,000 pounds-per-square-inch. Mr. Prentice reported based upon the location and magnitude of the leak, DCPD was required to declare two trains of the AFW System inoperable per Technical Specifications.

Mr. Prentice displayed photos of the leaking pipe and the hole in the pipe which was revealed once the insulation covering the piping was removed. Station personnel welded and repaired the pinhole leak. The AFW System piping was inspected to determine an extent of condition assessment and to confirm no other active leaks were present due to the same or a similar defect. Unit 1's AFW System piping was also inspected to confirm no active leakage. Unit 1 at the time was at 100% power operation. The Engineering organization performed ultrasonic testing on the piping to determine wall thinning of the AFW System piping. All Unit 2 AFW System outdoor piping had its insulation removed. He reported the result of these inspections found several areas of AFW piping showing wall thinning below acceptable American Society of Mechanical Engineer's (ASME) minimum wall-thickness in seven different locations due to corrosion. The affected areas were welded and repaired in addition to the weld repair performed on the leak. It was determined that damaged insulation on the cold AFW piping had allowed moisture and contaminants to penetrate the aluminum insulation jacket and become absorbed by the calcium interior of the insulation. These conditions led to a process called Corrosion Under Insulation (CUI) which caused an accelerated localized external corrosion.

On July 31, 2020, based upon the repairs made, both trains of the AFW System feedwater piping were declared operable in accordance with Technical Specifications and the resulting ability of the AFW System to perform its function. Mr. Prentice stated DCPD had a very clear inspection criteria for what repairs were required which was based upon ultrasonic methodology which he described as a nondestructive examination technique to identify locations and depth of any thinning. He reported the direct cause of the leak was the damaged insulation on the cold

¹⁰ A reactor is said to be critical when each fission releases a sufficient number of neutrons to sustain an ongoing series of nuclear reactions.

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AFW piping that allowed moisture to penetrate the aluminum jacket of the insulation and be absorbed by the insulation's calcium interior. The root cause revealed there was external operating experience circa 2009-2010 regarding the concept of CUI and the vulnerabilities it introduces to cold insulated piping but this operating experience was not appropriately recognized or incorporated into the Engineering organization's walkdown and inspection processes. Mr. Prentice reported that in 1984 there was a design change initiated on the AFW System prior to either unit going into service which installed check-valves in the system and as a result the AFW System piping temperature rating was not as great as initially designed. The installation of the insulation was due to the expected high temperature but it was not removed in response to the lower temperatures experienced

Mr. Prentice reported corrective actions to prevent recurrence include permanently removing insulation from all indoor and outdoor Unit 1 and Unit 2 AFW System discharge piping that is not required for equipment performance and to recoat that piping, as well as restoring or replacing any affected AFW piping that does not meet the minimum ASME Code for wall thickness. Removal of insulation has been implemented for Unit 1 during 1R22 and for Unit 2 for all areas which were reviewed.

In response to Dr. Budnitz observation that the root cause for the AFW System leak was the missed recognition opportunities in 2009-2010 for operating experience and for the design change made in 1985 Mr. Prentice replied that the goal of the root cause evaluation was to get to the lowest actionable level where corrective actions could be initiated to prevent recurrence. He reported that the CUI phenomenon was poorly understood prior to this event and DCP's susceptibility to CUI was not fully understood. He reported the CUI operating experience came from the South Texas Project but upon review DCP did not identify the AFW System as a potentially vulnerable system. Dr. Budnitz stated a similar event happened at the Waterford Nuclear Power Plant in Louisiana which was reviewed by DCP but the evaluators did not appreciate its application to AFW piping. Dr. Budnitz remarked and Mr. Prentice agreed that the root cause was not in missing the operating experience write-up but rather in not interpreting the write-up as applying to AFW piping. Mr. Prentice stated DCP also reviewed records of the 1985 design change and found an opportunity was missed at that time to remove the insulation. In response to Dr. Lam's comment Dr. Budnitz replied that all operating experience received by DCP is reviewed. Mr. Prentice reported that in the 2009-2010 timeframe operating experience received from INPO was initially reviewed by a single individual and since that time DCP has implemented procedures for evaluation guidelines for operating experience that include a review process which utilizes multiple subject matter experts and if the operating experience is found to be potentially applicable to DCP it is referred to and reviewed by additional evaluators.

Mr. Prentice stated the System Engineering Program procedures have been revised to add additional information regarding cold piping that can be vulnerable to CUI and the Containment Spray pipeway structure aging management procedures have been revised to place a focus on piping vulnerabilities. Design change development procedures have been revised to include consideration of CUI as a potential failure mode in the procedure's material compatibility segment and training has been conducted for Engineering personnel to address the effects of CUI, associated vulnerabilities and the symptoms and conditions that lead to CUI.

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Mr. Prentice reported that standards have been enhanced for accountability by the evaluator and screener responsible for the technically inaccurate operating experience evaluations. He reported enhanced review of the event was completed during the Unit 1 refueling outage and during the next Unit 1 and Unit 2 refueling outages a sample of insulation will be removed and inspected to look broadly at extent of condition for other systems for leakage or piping damage on the following systems:

- Steam Generator blowdown lines.
- Feedwater Regulating Valve bypass piping.
- Main Feedwater drain piping.

Mr. Prentice reported materials and housekeeping procedures are being revised to provide guidance for identification of insulation damage or degradation to ensure those items are entered into the Corrective Action Program and the work management process.

Mr. Prentice concluded his presentation with the observation DCPD has applied focus and energy concerning the AFW System leakage event to ensure that a similar event does not occur and has applied the lessons learned in that effort to drive corrective actions. In response to Dr. Budnitz' observation concerning piping temperature Mr. Prentice confirmed that a key piece of the analysis is the recognition that when piping temperatures are high moisture will evaporate and will not result in corrosion. In response to Consultant McWhorter's observation Mr. Prentice confirmed that the location of the AFW System leak in proximity to the drains for the steam generator power relief valves contributed to the problem as this area tends to be wetter than other areas. Mr. Prentice stated there are also differences at the site in the wind pattern and the local environment between the two units which contributes to differences in corrosion rates and accordingly creates different susceptibilities.

Following Mr. Prentice's presentation, Mr. Tom Marré was recognized. Mr. Marré remarked that there have been a number of instances at DCPD, including corrosion of a control rod circuit board, the issues with a phantom vibration issue for the generator such that weights were jury rigged to try to reduce the vibration and he commented a representative of the CPUC attended yesterday's public meeting out of a concern that DCPD be able to provide full generation capacity during the summer season and finally now this issue with the AFW System leak. He asked whether Mr. Prentice had any comment given that the plant is scheduled to close within the next five years. Mr. Prentice responded that when events occur at DCPD they are taken seriously and he gave the root cause evaluation of the AFW leak as an example. He stated his goal as Director of Risk and Compliance is to ensure a thorough evaluation is performed and if there is an extent of condition aspect, to ensure the highest level of rigor is employed to make sure the event is understood and appropriate mitigation measures are taken to reduce the identified risk. He commented the vibration problem with the Unit 2 Main Generator is another example of this effort and multiple processes are in place for both internal and external review of the issue and to manage the risk for items that are raised within the Corrective Action Program.

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The Chair thanked Mr. Prentice for his presentation.

Mr. Rathie reported that an email was received earlier in the day from Dr. Justin Cochran, the Senior Nuclear Policy Advisor and Emergency Coordinator for the California Energy Commission who has attended a number of the DCISC's past public meetings. Dr. Cochran stated he was listening remotely to the DCISC's public meeting but due to the cascading impacts being experienced by California from winter storm activity he was unable to participate fully in the meeting but he stated he valued the questions and the focus that the Committee is bringing to the subjects and topics reviewed at this meeting. Dr. Cochran observed relative to Dr. Peterson's earlier comment about the problems with the electric grid in Texas that it is not just the electrical grid that has experienced problems but also natural gas and petroleum supplies are experiencing problems which are spreading. Mr. Rathie confirmed that he responded to Dr. Cochran's communication and had thanked Dr. Cochran for his message.

A short break followed.

XXV TECHNICAL CONSULTANT REPORTS & RECEIVE, APPROVE, AND AUTHORIZE TRANSMITTAL OF FACT FINDING REPORTS TO PG&E

The Chairman requested Consultant Wardell to report on the December 14-15, 2020, fact-finding visit with Dr. Peterson to DCP. Mr. Wardell reviewed the topics discussed with PG&E on that occasion as follows:

➤ Refueling Outage 1R22 Foreign Material Exclusion (FME) and COVID Experience – Mr. Wardell reported 1R22 commenced on October 4 and ended on November 11, 2020. The Fact Finding Team reviewed the COVID-19 prevention program used during the refueling outage and Mr. Wardell reported a COVID-19 outage response coordinator position was created for the outage with the result that there were no new cases of COVID-19 amongst DCP personnel. From the approximately 800 contractor personnel on the site there were initially two cases of COVID-19 identified and both persons were placed in quarantine and one case was subsequently identified during 1R22 which Mr. Wardell described as good performance. Mr. Wardell reported the FME Program focuses upon the exclusion of objects from entering or being dropped into components which are open during an outage such as valves, tanks and the reactor vessel. Mr. Wardell reported extra precautions were taken during 1R22 with no Level 1 or Level 2 (the most significant) FME violations and a total of nine Level 3 or lower FME violations identified during 1R22. All violations were entered into the Corrective Action Program.

➤ Motor- and Air-Operated Valve Testing Programs – Mr. Wardell reported the valves in these programs are operated by electric motors or by air, although there are also manually operated and hydraulically operated valves in the plant which are addressed by the Air-Operated Valve Testing Program. He reported the Maintenance organization testing programs stroke-tests

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1,900 motor and air-operated valves during outages when the valves are not needed for operation. Valves are classified as follows:

Category 1 - 6 valves consisting of 3 Pressurizer relief valves on the Pressurizer for each unit which Mr. Wardell described as the most significant valves at the stations.

Category 2 – other safety-related valves.

Category 3 – non safety-related valves which are important for reliable operation.

Category 4 – valves of lesser importance.

During 1R22, 44 air-operated valves and 23 motor-operated valves were successfully tested by the use of automatic testing machines which open and close the valves and record opening times, the force need to open the valve, stem travel, etc. The Air and Motor-Operated Valve Testing Programs are in Green health status.

➤ Electronic Work Packages – Mr. Wardell reported 2% of the work at DCPD is done using through the use of an electronic work package. This work is of a relatively simple type such as painting, insulation, installing and removing scaffolding, etc. Mr. Wardell reported the transition to electronic work packages represents a significant transition for the DCPD workforce and accordingly the plant has proceeded slowly in making a transition to electronic work packages due to the scheduled retirement of DCPD in 2025.

➤ Meeting with NRC Senior Resident Inspector – the DCISC representatives met with the NRC Senior Resident Inspector Mr. Donald Krause to discuss outage 1R22, the Unit 2 forced outages to address the Main Generator hydrogen leak issue and the need to sustain a good nuclear safety culture through the end of the plant's operational period. Mr. Wardell reported the Fact Finding Team found the meeting with Mr. Krause to be very beneficial. Dr. Peterson reported that DCPD has issued laptop computers to its NRC resident inspectors which allows the inspectors to log in to the PG&E information system from their homes to be able to observe the state of the plant and the indications that are available in the information system from the Control Room. Dr. Peterson reported this was of great benefit to the inspectors but he commented that not all nuclear power plants have taken this step. Dr. Peterson stated this action demonstrates a substantial level of transparency by DCPD with its NRC resident inspection team and he remarked that the DCISC has also enjoyed a proactive relationship with DCPD with the plant making information available and guiding inquiries toward resources and he opined that this is of great value to the Committee.

➤ Workplace Seismic Safety: Control Room Procedure Cart – The Fact Finding Team continued its review of workplace seismic safety which review is intended to assure that personnel remain safe and have access to equipment that remains available following a seismic event. Mr. Wardell reported the DCISC representatives reviewed the capability during a seismic event of the cart used in the Control Room to hold the procedures for responding to abnormal emergencies. Mr. Wardell reported DCPD performed an analysis of this matter in 2010 which demonstrated that the probability is that while the cart might move during a seismic event it

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would not damage any important equipment and it is likely that the procedures would remain in the cart and in any event, the cart would remain available to the operators. He reported operators also have access to additional sets of procedures and the condition of the cart would have no effect on the operators' ability to respond.

➤ Operations Equipment Status Control Issue Update – Mr. Wardell reported the Operations organization has a procedure for Plant Status Control to assure proper equipment configuration. In 2019 problems were identified by the Quality Verification organization which led to a Yellow Operations performance status. A Plant Status Control Action Plan was developed and its implementation and an effectiveness review have now been completed. **Mr. Wardell reported that Plant Status Control performance is now judged satisfactory and he recommended that review of this issue be closed on the DCISC's Open Items List.**

➤ Meeting with Senior Vice President Generation and Chief Nuclear Officer Mr. James Welsch – Dr. Peterson and Mr. Wardell met with Mr. Welsch to discuss the items covered during the fact-finding and other topics and areas of interest.

➤ Safety-Security Interface and Intake Structure Devitalization – Mr. Wardell reported the safety-security interface reviews concerns the effects of changes in security on nuclear safety and vice-versa with each security change or plant or procedural modification by the Operations or Maintenance organizations going through a checklist process. The DCISC team found this process to be effective. Mr. Wardell stated the Fact Finding Team reviewed the changes to the security classification for the concrete Intake Structure located at the level of the Pacific Ocean where seawater is drawn into the plant for condenser cooling. The Intake Structure contains watertight chambers for the safety-related auxiliary saltwater (ASW) pumps. Mr. Wardell stated it is the vital nature of those pumps which supported the classification that made the Intake Structure a vital security area. As such, access to the Intake Structure was restricted and security personnel were required to be posted at the Intake Structure. Mr. Wardell reported recent analysis demonstrated other pumps are available to provide the same function as the ASW pumps and DCCP made a decision to seek to devitalize the Intake Structure and performed an analysis to support the request which was reviewed and approved by the NRC.

➤ Turbine-Generator Health – Mr. Wardell reported the turbine generator health was selected as the system to be reviewed during the December 2020 fact-finding visit. He reported the turbine generator consists of large components used to convert thermal energy from nuclear-generated heat, which is converted to steam by the steam generators, into mechanical and electrical energy. Steam from the steam generators provides rotational energy for the high and low pressure turbines which drive the generators which produces electricity. Mr. Wardell displayed photos of the turbine, the generator and the generator exciter, both with the casings in place and with the casings removed. Mr. Wardell reported system health for the Unit 1 Turbine Generator System is in Green status and for Unit 2 it is in Red status due to the hydrogen leakage problems discussed previously during this public meeting.

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➤ Meeting with Vice President Generation, Business & Technical Services Ms. Maureen Zawalick - the DCISC representatives met with Ms. Zawalick and discussed the various technical and business oriented functional areas which come under her oversight and leadership responsibilities which include Nuclear Decommissioning.

Mr. Wardell concluded his presentation with the observation that the fact-finding visit while productive would have been even more productive had it been possible to conduct an on-site visit. In response to Dr. Budnitz' query Mr. Wardell confirmed that both he and Dr. Peterson attended each of the meetings held with the NRC and with Mr. Welsch and the DCPD representatives during the December fact-finding. Dr. Lam observed this practice is and should be at the attending member's discretion.

Mr. David Weisman representing the Alliance for Nuclear Responsibility was recognized. Mr. Weisman inquired as to the type of informational access afforded to the NRC resident inspection team through their use of PG&E laptop computers which allows the inspectors to monitor the plant remotely and the nature, vulnerability and cyber security provided for connectivity which enables this function. Mr. Wardell and Mr. Guess responded that the NRC resident inspectors have the same access afforded to some DCPD employees and are subject to the same security restrictions. Dr. Peterson commented that this type of information constitutes safeguarded information but the information that is provided through outside access goes out from the plant through the use of data diodes and accordingly there is no path for a control signal to go back to the plant from any outside source. Mr. Guess stated there is no plant control function that can be manipulated remotely through the plant system firewall. He reported the types of information available to the NRC resident inspectors through their laptops includes access to Corrective Action Program documents and plant logs but no video recordings are transmitted off-site and accordingly there is no risk of compromising security. Mr. Guess confirmed Dr. Peterson and Dr. Budnitz' observations that information accessible to the NRC inspectors through their laptop computers is limited to plant operating status information and included electrical production, status of temperatures or pressures and other information relative to the business side of plant operations and there is no possibility of any information flowing back through that system to enable control of plant systems. Mr. Weisman commented that the terminology and impression given that the NRC resident inspectors are able to remotely monitor what occurs in the Control Room is not entirely correct in accordance with the response to his inquiry. Dr. Peterson remarked that both NRC resident inspectors have complete access to any and all areas of the plant and the inspectors are present on the site on a frequent basis and typically visit the Control Room each time they are on-site. He remarked the remote access function for the resident inspectors was implemented in response to the efforts to address the COVID-19 pandemic.

Upon a motion made by Dr Budnitz, seconded by Dr. Peterson, the December 14-15, 2020, Fact Finding Report was accepted by the DCISC and its transmittal to PG&E was authorized. The report will become a part of the Committee's 31st Annual Report.

XXVI ADJOURN MORNING MEETING

The Chair adjourned the morning meeting of the Committee at 11:45 A.M.

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XXVII RECONVENE FOR AFTERNOON MEETING

The February 17, 2021, afternoon session of the Diablo Canyon Independent Safety Committee was called to order by its Chair, Dr. Peter Lam at 1:30 P.M. Dr. Lam welcomed those persons participating in this Zoom Webinar and those watching the proceedings on live streaming video. Dr. Lam requested any of the members who wished to make remarks to do so at this time.

XXVIII COMMITTEE MEMBER COMMENTS

There were no comments by Members at this time.

XXIX PUBLIC COMMENTS AND COMMUNICATION

The Chair reviewed the invitation to address the Committee on matters not on the agenda for this public meeting and invited any comments from members of the public who wished to address the Committee to do so now. There was no response to this invitation. However, Assistant Legal Counsel Rathie reported that an email was received during the lunch break from Ms. Rochelle Becker, Executive Director for the Alliance on Nuclear Responsibility, with a link to a news report on PG&E's response to and responsibility for a wildfire in California. The Members and Mr. David Weisman of the Alliance for Nuclear Responsibility observed the matters raised by Ms. Becker's email were broadly applicable to PG&E's corporate safety culture as they address issues of cost versus safety which were also formed the basis for the establishment of the DCISC.

XXX INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

Dr. Lam requested Mr. Baldwin to introduce the next presentation. Mr. Baldwin introduced DCPD Director of Engineering Services Mr. Pat Nugent to make that presentation and reported Mr. Nugent has more than 30 years' service with PG&E and holds a Bachelor's Degree from Cal Poly San Luis Obispo and completed a certification as a Shift Technical Advisor and has held leadership roles within the Engineering and Regulatory Services organizations and completed an assignment with the Institute of Nuclear Power Operations. Mr. Baldwin reported Mr. Nugent was the Fukushima Response Manager for DCPD and has led the Quality Verification Department. Mr. Nugent reported he has held his position as Engineering Services Director for the past three and one-half years.

Engineering Department Update Including 2018-2020 Reorganization (Purposes, Actions and Results), Excellence Plan, and Current Significant Work Activities.

Mr. Nugent displayed an organizational chart depicting the current organization of the Engineering Department and he stated that in his role as Director of Engineering Services he has

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five separate direct reports from four separate sections including the Strategic Engineering, Tactical Engineering, Program Engineering and Design Engineering groups reporting directly to him as the Director and he is assisted in his role by an Assistant Engineering Director who also reports directly to Mr. Nugent and who has responsibility for Engineering applications in the Corrective Action Program and also for various special projects including for the work on the Unit 2 Main Generator. In response to Consultant McWhorter's inquiry Mr. Nugent reported the Engineering organization consists of 133 individuals with approximately 33 persons in each of the suborganizations he identified.

Mr. Nugent reported in August 2020 the DCPD Engineering organization was reorganized to maintain proficiency with decreasing staff size as the power plant approaches retirement and personnel leave employment through attrition and also to increase cross-training between engineers. A knowledge transfer program was established ten years ago prior to the decision to retire DCPD at the end of 2024-2025. Mr. Nugent stated the reorganization has allowed Engineering to better serve needs of its internal customers and the changes were based on industry guidance and recommendations. Five Engineering Fix-it-Now (EFIN) teams were expanded with staff increases through the reorganization to provide additional resources and more rapid response to equipment challenges. The EFIN teams now include civil, mechanical, electrical and instrument & control engineers with broad skill sets, system knowledge and design change capabilities. Both the EFIN teams and all component experts were grouped together into Tactical Engineering by the reorganization to allow for the EFIN teams to respond rapidly in support of plant challenges.

Mr. Nugent reported system engineers were grouped together by the reorganization into Strategic Engineering to allow focus on system monitoring and planning for maintaining reliable equipment. Design Engineering and Project Management were combined by the reorganization in anticipation of having fewer major projects. All major engineering programs were moved into Program Engineering to allow for continued focus through the end of plant life and Mr. Nugent reported many of these programs will be applicable through the shutdown of Unit 2 in 2025.

Mr. Nugent reviewed the highlights of the 2020 Excellence Plan including its focus on personnel safety through the successful elimination of safety vulnerabilities for personnel working remotely and the communication to staff of routine reinforcement of safety and human performance tools. He reported DCPD successfully implemented the engineering reorganization initiative while personnel were working remotely and implemented knowledge transfer plans in advance of retirements and departures. A grass roots committee was established to identify ways to help staff prepare for the end of the plant's operational lifetime.

Mr. Nugent reported Unit 1 reliability performance during 2020 was at the top of the industry. However, Unit 2's performance has been driven by challenges with Main Generator and he stated the Engineering organization has a strong role in supporting resolution of those issues. Mr. Nugent remarked there continues to be a focus on maintaining a strong technical conscience amongst Engineering staff. He reported opportunities were identified through the use of operating experience to reduce Unit 1 refueling outage work without affecting safety or reliability. Mr. Nugent stated this was accomplished through the elimination of some testing and

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maintenance activities where it was identified and determined that certain components were being over-tested or over-maintained which Mr. Nugent stated can have an adverse effect on their reliability. Some maintenance and testing frequencies have been adjusted accordingly.

Mr. Nugent reported on the focus areas for the 2021 Excellence Plan which continues to include personnel safety including monitoring the health and well-being of staff as the plant moves into its second year of having personnel who can do so continue to work remotely. Mr. Nugent reported personnel are expected to continue to work remotely until at least July 6, 2021, at which time the issue of remote work will be reviewed. In response to Dr. Lam's observation Mr. Nugent confirmed that certain Executive Orders issued by the Governor will play a part in any decision concerning continuing, modifying or ending remote work. The grass roots committee he described will continue to be utilized to implement ideas to strengthen PG&E knowledge of DCPD personnel and to ensure personnel are aware of career opportunities available in other areas of PG&E's operations such as within PG&E's Gas Transmission and Distribution organizations and that organization is aware of the specialized skill sets and capabilities of those persons in DCPD's Engineering organization.

Mr. Nugent reported that for 2021 reliability goals will include maintaining Unit 1's performance at the top of industry and to resolve the Unit 2 Main Generator challenges to assure both units operate reliably during the summer months when power is needed most by PG&E's customers. Continued maintenance of a strong technical conscience for Engineering staff remains a priority for his organization. He stated process improvements will continue to be implemented to improve affordability by reducing the time required for refueling outage equipment testing and to improve efficiency in that process.

In response to Consultant McWhorter's inquiry Mr. Nugent replied that the Engineering organization at the present time is not providing support to the DCPD Decommissioning organization which has a separate staff but communication exists between the two organizations toward the development of an understanding of the types of engineering support that will be required for decommissioning the power plant.

In response to Consultant Wardell's inquiry, Mr. Nugent replied his organization encourages engineering staff to obtain professional engineering licenses through an educational incentive refund programs and through payment for renewal of their annual license fees. Mr. Nugent stated a certain number of professional engineering licenses are maintained amongst DCPD's employees in order to review and approve design calculations but there are no specific requirements for new engineers to necessarily have a certain professional license. Mr. Nugent, in response to Mr. Wardell's query, stated that DCPD is not looking to hire new engineers at the present time and is backfilling engineering positions as needed, in some cases from other areas of PG&E's operations. In response to Consultant Wardell's inquiry Mr. Nugent identified replacement of a computer system for the _____ System, replacement of the plant's air compressor system, and replacement of the oily water separator as examples of major project being undertaken by Design Engineering between now and 2025.

Dr. Budnitz observed that, as Mr. Nugent described, sometimes doing more maintenance can be detrimental to equipment. Mr. Nugent agreed and observed that review of the monthly

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testing and maintenance previously performed on all six emergency diesel generators (EDG) was determined to have caused additional and excessive wear on their components and accordingly at the present time DCPD tests only one EDG each month which has significantly increased the EDG's overall reliability and availability. He remarked that too-frequent maintenance also carries a risk of failing to restore equipment properly and of introducing a new part that is less reliability than the part replaced and sometimes a new part can experience what Mr. Nugent described as instant mortality.

Following Mr. Nugent's presentation Ms. Sherry Lewis of San Luis Obispo Mothers for Peace was recognized. Ms. Lewis stated she wondered whether any of the opportunities to reduce refueling outage work were connected to DCPD's plans to delay the transfer spent fuel from the spent fuel pools to dry cask storage which would necessarily result in a large number of spent fuel assemblies remaining in the spent fuel pools and thereby saving the cost of transferring the assemblies incrementally rather than all at one time. Ms. Lewis stated her opinion that PG&E's preference in this regard is not safe due to the required tight packing of the fuel assemblies in the spent fuel pools and she referred to the comments earlier in this public meeting concerning PG&E choosing cost savings over safety. The Chair thanked Ms. Lewis for her remarks.

Mr. Tom Marré was recognized. In response to Mr. Marré's inquiry, Mr. Nugent confirmed that the DCPD Decommissioning organization is part of the PG&E Generation organization but Mr. Nugent stated that a final decision on how decommissioning the power plant will be accomplished and how and under what oversight that process will proceed for the long term is pending and a final decision has not been made. Mr. Nugent stated different power plants have taken differing paths in decommissioning and consideration is being given to industry experience. Dr. Lam remarked federal regulations provide a 60-year time period for the licensee to complete decommissioning and within that period there exists considerable discretion and choices.

The Chair thanked Mr. Nugent for a very informative presentation.

XXXI CONCLUDING REMARKS & DISCUSSION BY COMMITTEE MEMBERS OF FUTURE DCISC ACTIVITIES

Dr. Budnitz expressed his hope that it might be possible to hold the June 23-24, 2021, public meeting in person in Avila Beach, California ,

Dr. Lam reported that all matters on the Committee's agenda for this public meeting have now been addressed and he expressed the thanks of the Committee to Mr. Baldwin and the DCPD management team for their assistance and participation in this public meeting and to the AGP Video team for supporting this Zoom webinar and livestream internet format. Mr. Rathie expressed his appreciation to Mr. Garcia who was instrumental in making this public meeting successful.

AGENDA PACKET DRAFT - JUNE 9, 2021

XXXII ADJOURNMENT OF NINETY-EIGHTH PUBLIC MEETING

There being no further business the ninety-eighth public meeting of the Diablo Canyon Independent Safety Committee was then adjourned by its Chair, Dr. Peter Lam at 2:15 P.M.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	June 23, 2021
AGENDA ITEM:	V-A
AGENDA TITLE:	Update on Financial Matters and DCISC Activities

CONSENT ☐ ACTION ☐ INFORMATION ☒

Staff Summary: It is expected that the Committee Members will hold a discussion regarding Committee financial matters and DCISC planned activities during the 2021.

The Actual and Proposed DCISC Fact-Finding and Public Meeting Items, with Key Dates, prepared by Committee Consultant Ferman Wardell is provided for your use in reviewing and planning Committee activities.

RECOMMENDED COMMITTEE ACTION: As appropriate

DCISC Fact-Finding and Public Meeting Agenda Items for 2020-2021

July 21-22, 2020 Fact-finding Meeting (PFP, RFW) (AR Exhibit D.1)

1. Meet with NRC Senior Resident Inspector
2. Compressed Air System Review with System Engineer
3. Observe Plant Health Committee Meeting (Camceled)
4. 2019 Radioactive Effluent Release Report & Radiological Environmental Operating Report
5. Containment Concrete Inspection with Camera Drone
6. Equipment Reliability Process Update
7. Operations Issue on Misposition Errors (Equipment Control Status)
8. DCPD Use of Social Media in Context of Emergency Response
9. Buried Piping and Tanks Program
10. Slight Rise in Unit 1 Power Operation Just Prior to its Curtailment to 89% Power Operation to Address an Issue with Supplemental Grid Protection
11. Update on INPO Evaluation Actions
12. Meet with DCPD Officer

August 19-20, 2020 Fact-finding Meeting (PL, RDM) (AR Exhibit D.2)

1. Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector
2. License Amendment Request to Facilitate Auxiliary Feedwater Inspections
3. Unit 2 Forced Outage
4. Fire Protection and Detection Systems
5. Attend Corrective Action Review Board Meeting
6. Evaluation for Extending the Unit 1 Steam Generators Secondary Side Inspections
7. Containment Ventilation and Hydrogen Mitigation Systems
8. DCISC Member Meet with DCPD Officer
9. Employee Concerns Program
10. NRC Inspection Finding on Emergency Siren Maintenance
11. Status of Responding to the COVID-19 Pandemic
12. Self-Assessment Program
13. Attend Plan of the Weekend Review Meeting

September 9-10, 2020 Fact-finding Meeting (RJB, RFW) (AR Exhibit D.3)

1. NRC Licensing Issues Status
2. Outage Safety Training
3. Meet with DCPD Site Vice-President Paula Gerfen
4. Auxiliary Feedwater System License Amendment Request
5. 1R22 Refueling Outage Safety Plan
6. Meet with NRC Senior Resident Inspector
7. Control Rod Issues
8. Postponed/Cancelled Projects
9. Nuclear Instrumentation Systems
10. Overall Probabilistic Risk Assessment Program Update
11. Operational Decision-Making Program
12. Employee Retention Participation Update

October 22-23, 2020 Public Meeting (AR Exhibit B.3)

- A. Informational Presentations Requested by the Committee of PG&E Representatives:

- 1) State of the Plant Update including Key Events, Highlights, Organizational Changes, Retention Tier 2 Update, COVID-19, Pandemic, Unit 1 Outage Activities, Recent Wildfires, Recent, Human Performance in Operations, and other, Station Activities Since the DCISC July 2020 Public Meeting.
- 2) Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Issues Raised by NRC Resident Inspectors, Open Compliance Issues, and License Amendment Requests. And Other Significant Regulatory Issues/Requests.
- 3) Cause and Corrective Action for the February 2020 Unit 2 Forced Outage to Repair the Rod Control System.
- 4) Decommissioning Planning Update, Including Status of Spent Fuel Cask Request for Proposals And Possible Recommendation.
- 5) Update on Emergency Preparedness Programs Including Changes Made in Response to the COVID-19 Pandemic.
- 6) Update on the Activities of the Diablo Canyon Decommissioning Engagement Panel.

November 10, 12 & 19, 2020 Fact-finding Meeting (RJB, RDM) (AR Exhibit D.4)

1. Attend Outage Planning Meetings
2. Attend Corrective Action Review Board Meeting
3. Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector
4. Unit 2 Forced Outage
5. Cybersecurity Program
6. Radioactive Waste Processing Systems
7. Meet with DCPD Officer
8. Seismically Induced System Interactions Program
9. Control Room Simulator
10. Drone Sightings
11. Engineering Reorganization and Excellence Plan
12. Nuclear Safety Oversight Committee Exit Meeting

December 8-9, 2020 Fact-finding Meeting (PFP, RFW) (AR Exhibit D.5)

1. Refueling Outage 1R22 Foreign Material Exclusion and COVID Experience
2. Motor- and Air-Operated Valve Testing Programs
3. Electronic Work Packages
4. Meeting with NRC Senior Resident Inspector
5. Workplace Seismic Safety: Control Room Procedure Cart Stability
6. Operations Equipment Status Control Issue Update
7. Meeting with Jim Welsch, DCPD Chief Nuclear Officer
8. Safety-Security Interface and Intake Structure Devitalization
9. Turbine/Generator Health
10. Meeting with Maureen Zawalick, Vice President, Generation, Business & Technical Services

January 13-14, 2021 Fact-finding Meeting (PL, RDM) (AR Exhibit D.6)

1. Institute of Nuclear Power Operations Corporate Evaluation
2. Steam Generator Inspection Results

3. Safety System Functional Failures
4. Large Transformer Health
5. Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector
6. Meet with DCCP Officer
7. Licensed Operator Training Class Observation
8. Low Temperature Overpressurization Protection System Event
9. Chemical and Volume Control and Emergency Core Cooling Systems
10. Control Room Ventilation Systems
11. COVID-19 Pandemic Response
12. Learning Services Department Update
13. Unit 2 Main Generator Issues and Root Cause Evaluation Update

February 16-17, 2021 Public Meeting (AR Exhibit B.6)

- 1) State of the Plant Update Including Key Events and Highlights, Outages Including Unit 2 Forced Outages to Address Main Generator Issues, Organizational Changes, Response to the COVID-19 Pandemic, and Other Station Activities since DCISC's October 2020 Public Meeting.
- 2) Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Issues Raised by NRC Resident Inspectors, Open Compliance Issues and License Amendment Requests and Other Significant Regulatory Issues/Requests
- 3) Performance During the 22nd Refueling Outage for Unit 1 Including
- 4) Key Activities, Performance Indicators, Results Achieved, Fuel and
- 5) Steam Generator Inspection Results, Unexpected Equipment Issues
- 6) and Open Items.
- 7) History of Drone Sightings at Diablo Canyon and Implications
- 8) Upon Nuclear Safety.
- 9) Monitoring and Reporting of Radiological Effluent Releases and
- 10) Radiological Environmental Impacts.
- 11) Results of the 2020 Operating Plan and Key Elements of the 2021 Operating Plan
- 12) Causes and Corrective Actions for the Unit 2 Auxiliary Feedwater System Leak that Occurred During Shutdown in July and Actions Taken to Inspect Unit 1 for Similar Issues
- 13) Engineering Department Update Including 2018-2020 Reorganization
- 14) (Purposes, Actions and Results), Excellence Plan, and Current
- 15) Significant Work Activities.

March 17-18, 2021 Fact-finding Meeting (RJB, RFW) (AR Exhibit D.7)

1. Station Excellence Plan
2. Meet with Quality Verification Director
3. Reactor Protection System
4. Vibration Monitoring Program
5. Tornado Missile Licensing Update
6. Winter Storm Response
7. Fire Protection: NFPA-805
8. Maintenance Department Update

9. Nuclear Fuel Performance
10. Meet with NCR Resident Inspector

April 27-28, 2021 Fact-finding Meeting (PL, RDM) (AR Exhibit D.8)

1. Radiation Monitoring Systems
2. Meet with DCPD Officer
3. Auxiliary Building Ventilation System
4. Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector
5. Human Performance Update
6. Maintenance Rule Program
7. Boric Acid Corrosion Control Program
8. Unit 2 Main Generator Issues and Root Cause Evaluation Update
9. Post-Shutdown Technical Specifications License Amendment Request
10. Low Temperature Overpressurization Protection System Event
11. Spent Fuel Cask Procurement Update
12. Observe Corrective Action Review Board Meeting

May 18-19, 2021 Fact-finding Meeting (PFP, RFW) (AR Exhibit D.9)

1. Reactivity Management Update
2. Meet with the NRC Senior Resident Inspector
3. Wildfire Risk
4. Independent Spent Fuel Storage Installation (ISFSI) Update
5. DCPD After COVID Pandemic
6. Reactor Vessel Specimen Testing Program
7. Emergency Preparedness Virtual Capabilities
8. Meet with Paula Gerfen, DCPD Site Vice-President
9. Quality Verification (QV) Audits
10. Operator Concerns/Issues

June 23-24, 2021 Public Meeting (AR Exhibit B.9)

1. Update on the Efforts to Retain Qualified Staff Including Those with Critical Skills (Such as Licensed Operators, Senior Maintenance Technicians, Etc.)
2. Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspections Reports and Notices of Violation, Issues Raised by NRC Resident Inspectors, Open Compliance Issues, Current and Future License Amendment Requests, cross-cutting aspects of performance, and Other Significant Regulatory Issues/Requests.
3. Quality Verification's Perspective on Plant Performance, Top Issues, Quality Performance Assessment Report.
4. Update on Unit 2 Main Generator Outages and Repairs.
5. Presentation on the State of the Plant: including Key Events, Outages, Highlights, Organizational Changes, COVID-19 Pandemic Response and other Station Activities since February 2021.
6. Remarks by the NRC Senior Resident Inspector for Diablo Canyon Power Plant
7. Performance During 22nd Refueling Outage for Unit-2 including Key Activities, Main Generator Repairs and Modifications, Performance Indicators, Results Achieved, Unexpected Equipment Issues, and Open Items.
8. Update on Performance Improvement Programs

9. Station Excellence Plan and Station Oversight Committee
10. Update on Emergency Preparedness During Decommissioning

July 14-15, 2021 Fact-finding Meeting (PFP, RDM) (AR Exhibit D.1)

August 18-19, 2021 Fact-finding Meeting (PL, RFW) (AR Exhibit D.2)

September 13-14, 2021 Fact-finding Meeting (RJB, RDM) (AR Exhibit D.3) [EP Drill 9/15/21]

October 19-20, 2021 Public Meeting

November 16-17, 2021 Fact-finding Meeting (RJB, RFW)

December 7-8, 2021 Fact-finding Meeting (PFP, RDM)

January 11-12, 2022 Fact-finding Meeting (PL, RFW)

February 15-16, 2022 Public Meeting

March 22-23, 2022 (RJB, RDM)

April 12-13, 2022 (PFP, RFW)

May 10-11, 2022 (PL, RDM)

June 22-23, 2022 PM

DCPP 2020-2021 Key Dates

NSOC Meetings (DCISC invited only to the 2-hour exit meeting on the final day, Thursday)

March 1, 2021 (final day 3/4)

July 12, 2021 (final day 7/15)

November 1, 2021 (final day 11/4)

Refueling Outages

3/27 – 5/22/22 1R23

NRC Inspections

1/25-2/12/2021 NRC Triennial Fire Protection Inspection
2/22-3/11/2021 NRC Cyber Security Inspection
3/1-3/5/2021 NRC Radiation Safety Inspection
3/15-3/26/2021 NRC ISI Inspection
3/22-3/26/2021 NRC Outage Radiation Safety Inspection
5/31-6/4/2021 NRC TI 2515-194 Inspection
6/21-6/25/2021 NRC Security FFD Inspection 2/10/2021 –
7/26-8/13/2021 NRC DBAI Inspection
9/13-9/17/2021 NRC Exercise & PI Inspection
9/20-9/24/2021 NRC Radiation Protection Inspection
10/4-10/8/2021 NRC Security Access Authorization and Access Control Inspection
10/18/10/22/2021 NRC Heat Sink Inspection

Emergency Preparedness

2/10/2021 – 1Q DEP Tabletop Drill (Delta)
6/9/2021 – 2Q DEP Drill w/ Operations Simulator (Alpha)
9/15/21 — Full Scope Drill

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:

June 23, 2021

AGENDA ITEM:

V-B

AGENDA TITLE:

Consideration of Issues on the
Open Items List

CONSENT ☐

ACTION ☒

INFORMATION ☒

Staff Summary: It is anticipated that the committee will hold discussion concerning the items appearing on its Open Items List prepared by Committee Technical Consultant Ferman Wardell.

RECOMMENDED COMMITTEE ACTION: As appropriate, review and provide direction.

Diablo Canyon Independent Safety Committee Open Items List – 2020-2021

Open Item Type:

M= Monitor

F = Follow-up

I = Issue

Items in Red Italics are new or revised

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
CO		Conduct of Operations (CO)		
CO-7	M	Review DCCP storm response experience and strategy every two years [or as necessary] during or after annual winter storm season.	5/17FF 3/21FF	As necessary
CO-8	M	Monitor all reactor trips – automatic and manual – and forced outages. (review trip LERs at public meetings). [Reviewed Unit 2 forced outage 3/20FF & 4/20FF – satisfactory.]	8/20FF 11/20FF 1/21FF	Post-trip FFs & PMs
CO-9	F	Reactivity Management – review every 18 months. [Reviewed Reactivity Management 5/16FF, 4/18FF, and 11/19FF – satisfactory.]	List at end of OIL	Regularly 4Q22FF
CO-10	M	Mispositioning Errors (Equipment Status) – monitor the status of mispositioning errors and actions to resolve. [Reviewed at 11/15FF – satisfactory.] [Reviewed QV assessment of 2R20 outage. Some mispositioning issues. Follow up on resolution.] [Reviewed 4/20FF – needs follow-up at FFs]	4/20FF 7/20FF 12/20FF	4Q21FF
CO-11	M	Operator concerns and issues – review periodically the status of operator concerns and issues. [Reviewed Ops Human Performance & Ops Excellence Plan 8/16FF – satisfactory.] [Reviewed Ops Dept. performance 12/17FF – sat.] The DCISC team concluded [2/18PM] plans are in place to address areas identified for improvement in the Operations Department and the DCISC should continue to review Operations Department performance on a regular basis. [Reviewed Operations performance 5/21FF – satisfactory.]	12/18FF 4/20FF 5/21FF	1Q22FF ?
CO-13	M	Review any implementations of the CAISO load following policy that result in DCCP transients. Review any initiatives to operate DCCP in different modes, such as load following due to renewable energy fluctuations, during its final years of operation. Include 230kV voltage stability issues. Dr. Peterson observed there is potential that an increase in the risk of transmission problems or outages might affect the availability of alternate off site power sources for DCCP due to increasing incentives to curtail power output because of production or grid-related reasons. Mr. Peck and Dr. Peterson agreed this might be a suitable topic for a future DCISC fact-finding which should include representatives from the PG&E transmission organization. [Reviewed at 5/19FF – satisfactory.] [Reviewed 12/19FF, including Public Safety Power Shutoff Program.]	5/19FF 12/19FF	As necessary
CO-14	F	The DCISC team found the operator retention project to be effectively managed but the Committee should follow this issue closely with reference to licensed operators and well as the station in general. [Reviewed Operator License Class plans 1/19FF – satisfactory. Reviewed overall Retention Plan 9/20FF – satisfactory.]	1/19FF 9/19FF 9/20FF	3Q21FF 6/21PM

CM		Conduct of Maintenance (CM)		
CM-7	I	Review PG&E's progress in complying with (1) the amendment to 10CFR50.55a, which provides the requirements for ISI of containment structures (degradation) and (2) ASME Code requirements for steel liner weld inspections.	7/12FF 8/17FF 11/19FF	Each Pair of RFOs 3Q21FF
CM-10	M	On-line Maintenance: review the implementation of on-line maintenance bi-annually, including the 12-week Rolling Maintenance Schedule about how well it is working & impacting risk. Review trend of amount of on-line maintenance. DCCP Assessment of Maintenance Risk and On-Line Maintenance Risk Procedures have been substantially upgraded with the addition of an Integrated Risk Review Team.	See list at end of OIL	Regularly
CM-13	M	Review Maintenance Department performance measures, staffing, etc. approximately annually. [Reviewed 1/20FF – satisfactory.]	1/20FF 3/21FF	1Q22FF
EN		Engineering Programs (EN)		
EN-16	F	DCCP Systems – review a system (or structure or component), system health, long-term plan, Maintenance Rule performance & walkdown with System Engineer at FFs. [Note: Systems reviewed are listed with dates at the end of this Open Items List.]	See list at end of OIL	Regularly
EN-19	F	Review every 12-18 months major Engineering Programs, including Configuration Management, Management, System Engineering (system health & long-term plans), Valve Testing, Margin Management, Staffing, etc. [Note: Programs reviewed are listed with dates at the end of this Open Items List.]	See list at end of OIL	Regularly
EN-20	F	Each Member should review or observe Plant Health Committee, Notification Review Team, Corrective Action Review Board, Performance Review Quarterly Meeting, and other regular meetings.	See list at end of OIL	Regularly
HP		Human Performance: Human Errors and Improving Safety & Efficiency of Plant Performance		
HP-1	M	Review human performance & human behavior items (including error reduction programs, HP Pls. aberrant behavior statistics, FFD, stress reduction programs, Personnel Accountability Policy, Human Performance Steering Committee & Subcomm, Centers of Excellence, Org. Development). [Review biennially operator aging, physical fitness, "no solo" issues, attention enhancement, stress management, & incentives for operator focus.	10/19PM 3/20FF 12/20FF 4/21FF	2Q22FF
HP-25	M	Further observations and improvements in the Management Observation Program should be reviewed by DCISC. [Reviewed 4/19FF – satisfactory.] [Not RJB]	7/17FF 4/19FF	1 or 2Q21FF
HS		Health, Nuclear Safety and Safety Conscious Work Environment		
HS-6	F	Follow DCCP progress in establishing/improving its safety culture (and its subset Safety Conscious Work Environment, including Safety Culture Monitoring Panel, and including Employee Concerns & Differing Professional Opinion Programs). [Reviewed ECP 8/20FF – satisfactory.]	10/18PM 8/19FF 8/20FF	3Q21FF
PI		Performance Improvement Programs		

PI-1		DCPP Performance Improvement Programs: Corrective Action, Self-Assessment, Operating Experience [and line use of OE], Benchmarking, etc. Programs reviewed are listed with dates at the end of the Open Items List.]	See list at end of OIL	At least once per year
EP		Emergency Preparedness (EP)		
EP-2	M	Attend and observe DCCP emergency drills and exercises annually [including Hostile Action Based Exercises], paying special attention to JIC communications to the media and public, including radiation release communications to the public, use of social media, coordination of information release with SLO County, and extension of drills to better exercise FMTs & JMC. [Next evaluated exercise 9/15/21?]	2/17PM 8/18FF 11/18FF	Next evaluated exercise (FFPM)
RA		Risk Assessment and Management (RA)		
RA-5	M	Review overall [non-seismic] PRA program annually. Include Fire PRA Upgrade & Shutdown Analysis in next review. Much work underway (including plant specific shutdown risk analysis). Review PRA Group resources/capabilities. Turbine Bldg. (CCW & Condenser) internal flooding. Include external flooding and tsunami risk (see SC-6). [2/18PM: Review DCCP study of loss of ASW on core damage frequency.]	9/17FF 9/18FF 9/19FF 9/20FF	3or4Q21 FF RJB
NS		Nuclear Safety Oversight and Review (NS)		
NS-5	M	Monitor NSOC meetings periodically to observe their processes and their review of nuclear safety issues.	11/20FF 3/21FF	Next meeting [see FFPM]
NS-9	M	Monitor DCCP's program to track INPO Areas for Improvement. Review with DCCP Coordinator. [Reviewed 7/20FF – satisfactory.]	11/19FF 7/20FF 1/21FF	2Q21FF
RP		Radiation Protection (RP)		
RP-3	M	Regularly review outage RP performance. [Reviewed 1R21 and 2R21 outage performance – satisfactory.]	12/19FF 12/20FF	Each RFO 7/21FF
RP-12	M	Review annual DCCP radioactivity release report each year. Review at Summer or Fall FFs. [Reviewed radiation release reports 7/18FF – satisfactory.]	7/19FF 7/20FF 2/21PM	2/21PM 2or3Q21 FF
QP		Quality Programs (QP)		

QP-3	M	Review the activities, organization and results of QV audits as well as PG&E's outside biennial audits, including timeliness of corrective actions. Review annually – include 4 th quarter QPAR with yearly results.	3/21FF 5/21FF	2Q2FF
QP-9	F	Software QA Program - [Reviewed at March 2018 FF – satisfactory.]	See list at end of OIL	Regularly
NF		Nuclear Fuel Performance (NF)		
NF-9	M	Nuclear Fuel Performance & Issues (review after RFOs).	12/19FF 3/21FF	Each RFO
ER		Equipment Reliability and Life Cycle Management (ER)		
ER-5	M	Monitor the Equipment Reliability Process approximately annually. The indicators for Deficient Critical Components Backlog and Operational Work-arounds rated as needing improvement and the DCISC should continue its review of this item in the future.	See list at end of OIL	Annually
OE		Organizational Effectiveness & Development (OE)		
OE-1	F	Review DCCP Operating Plan each January after development.	2/20PM 2/21PM 3/21FF	2/22PM
SE		System and Equipment Performance/Problems (SE)		
SE-26	M	Review reactor pressure vessel compliance status after next set of surveillance samples is analyzed and effective vessel lifetime projections are updated.	4/19FF 5/21FF	1R23 2R23 or Close?
SE-39	F	Review and tour the inspections and repairs of concrete Intake Structures following selected refueling outages. [Reviewed at 7/09 FF, 6/13 FF, 11/14FF, 9/17FF, and 12/19FF – satisfactory.]	12/19FF	2R22 3Q21FF
SE-40	F	Monitor the status of transformers & leakage, failures, corrective actions. Follow status of transformer protection barrier. [Barrier project placed on hold.]	See list at end of OIL	Regularly
SE-49	F	Emergency Diesel Generators (EDGs) – [Reviewed at 5/20FF: U1 Green, U2 Green.]	See list at end of OIL	Regularly

SE-50	F	Maintenance Rule Functional Failures [Change from SSFFs to MRFFs beginning 3/21FF.]	See list at end of OIL	Regularly
OM		Outage Management (OM)		
OM-3	M	During outages, monitor Outage Coordination Center, Control Room, and containment walkdown/inspection (end of outage). Review outage turbine work. Review Steam Generator performance metrics and inspection results. [Reviewed Unit 2 forced outage – satisfactory.]	3/20FF 11/20FF	Each RFO
OM-4	M	Review Outage Safety Plan, safety margin trends, outage results, including clearances, following each outage at FFs and PMs. [Reviewed at 1/19FF & 9/19FF & 9/20FF – satisfactory.]	12/19FF 9/20FF	Each RFO 7/21FF
OM-5	F	DCPP has determined that it needs to do a better job of foreign material exclusion (FME) and this resolution appeared satisfactory to the DCISC team. [Note: FME Program review dates at the end of the Open Items List.] [Reviewed 9/17FF – satisfactory. [Reviewed 4/19FF – need to follow up on supplemental outage worked training]]	See list at end of OIL	Each RFO
SEC		Security (SEC)		
SEC-3	M	Monitor interaction of Security and Operations, Engineering, Maintenance, and Emergency Preparedness for effects on nuclear safety. Plant security per se not reviewed but reviewed only in the context of impact on plant operation.	12/19FF 12/20FF	4Q21FF
SEC-4	M	Review DCCP progress in implementing their cyber security program in compliance with NRC schedule. Implementation complete. [5/18FF: The DCISC should continue to review the Cybersecurity Program every two to three years.]	3/19FF 11/20FF	9/21FF (RJB)
SF		Independent Spent Fuel Storage Installation – ISFSI (SF)		
SF-1		Monitor ISFSI operations, including cask transfer. Review following next campaign.	10/20PM 5/21FF	2Q22FF
SF-2	M	Follow technical advances of relative risks of cask and pool storage. NRC Staff study and Commissioners' vote. Monitor needs for opening casks to inspect fuel. Monitor SONGS & Humboldt Bay spent fuel transfer plans. Include corrosion of metals	12/19FF 4/21FF	2Q22FF
SF-3	M	Review the seismic adequacy of ISFSI in its license extension. Use latest seismic analysis.	6/18PM 10/19PM	2Q22FF RJB

SC	M	Seismic, Tsunami and Other External Events		
SC-3	M	Long-Term Seismic Program: review periodically. Review significant seismic events as they occur. Reviewed at 6/09 PM. [Reviewed 3/10 FF – progress satisfactory. Continue to monitor.] DCPD Seismic study reviewed 3/15 FF & to be presented by DCPD at 6/15PM. Shoreline Fault – follow activities and events with the	6/15PM 11/15FF 8/16FF 3/19FF	9/21FF RJB
SC-12	F	Workplace seismic safety – review annually. [Reviewed at 5/18FF – some problems – follow up on resolution and Control Room procedures “crash cart” stability. [Discrepancies in workplace seismic standards (e.g., unbraced furniture) were caused by inadequate knowledge transfer during Building Services personnel turnovers, although the plant had a written standard. [Control Room procedure card reviewed 12/20FF – satisfactory.]	5/19FF 12/19FF 12/20FF	12/21FF PFP
FP		Fire Protection (FP)		
FP-5	M	Review NFPA-805-based Fire Protection Program and Systems every two-three years, including QV audits and NRC triennial inspections. Review the health and correction of degraded systems every six months. Monitor fire doors (Plant Door Life Cycle Management Plan) for correction of impairments [Fire doors Reviewed 11/17FF & 3/19FF - satisfactory.] [Reviewed NRC Triennial FP Inspection 1/19FF – satisfactory.]	1/19FF 3/19FF 5/21FF	Regularly
LD		Learning & Development Programs (LD)		
LD-3	M	Review non-license technical, operations & accredited training programs at least annually. [Reviewed Training during COVID-19 5/20FF – satisfactory.]	7/19FF 5/20FF 1/21FF	4Q21FF
LD-6	F	Observe operator license, re-qualification, classes periodically in FF meetings. Include Enhanced Simulator Training.] [Observed Ops TCOA training & Eng. DC Power System] [Reviewed FLEX training 11/17FF – sat.] [Reviewed licensed operator training 9/20FF & 1/21FF – satisfactory.]	9/20FF 1/21FF	4Q21FF
NR		Nuclear Regulatory Commission Items (NR)		
NR-3	M	Monitor the Non-Cited Violation Tracking & Trending Program annually at the Jan/Feb Public Meetings.	3/year	Each PM
NR-4	F	Meet with NRC Resident Inspectors regularly.	Most FFs	Regularly
DEC	F	Decommissioning		

DEC-1	F	Review DCCP decommissioning plans periodically as a result of the Joint Proposal plant shutdown in 2025. Review the timing of spent fuel transfer from wet to dry storage and when the spent fuel pools are decommissioned the plant will lose the capability to open multipurpose canisters for inspection. DCISC should actively review the decommissioning plans for DCCP because of the potential impact on staffing and future options with respect to managing spent fuel. Dr. Peterson observed there have been multiple approaches taken to decommissioning in terms of rate and timing and the DCISC will need to review and discuss with its appointing entities whether and to what extent it will engage in a review of PG&E's decommissioning plans for DCCP. [Reviewed at 11/18FF – satisfactory. Continue to monitor.] He [Mr. Jones] reported part of the preplanning efforts to meet the charge from the CPUC is the completion of a fuel study that is now in its second draft for review to determine how DCCP can move past the ten-year window to achieve a seven-year window. Dr. Budnitz reported the DCISC will wait and watch the report which comes out of that evaluation.	2/19PM 10/19PM 10/20PM	10/21PM
DEC-3	F	DCISC is at this time principally interested in decommissioning due to the potential impacts during the period of plant operation and will seek clarification about whether the DCISC should play a role post-shutdown.	2/20PM 10/20PM	Waiting on CPUC
DEC-4	F	Emergency preparedness during decommissioning. [Met with SLO OES 9/18FF – satisfactory there was concern by SLO County that their monies from PG&E would be reduced after operation ceases. [Met with new Director SLO Emergency Services 8/19FF. Director discussed with DCISC at February 2020 PM.]	8/19FF 2/20PM 10/20PM	10/21PM
O		Other Items (O)		
O-1	F	Perform observations of evolutions (work processes) within the plant periodically. Continue with these about annually. Work process observations: Observe in the plant work processes important to nuclear safety, such as operator rounds, Control Room shift turnover, surveillance tests, preventive and corrective maintenance, system modifications, system walk downs with system engineers; outage activities, etc.	12/19FF 1/20FF	On hold due to COVID
O-2	F	COVID-19 response/initiatives/practices. Review at each FF and PM until threat passes	1/21FF 5/21FF	3Q21FF
		Public Meeting Items (PM) (Reference: Public Meeting Minutes Pages)		
July 2020 PM 1	F	Dr. Peterson remarked there is much to be learned from the response to the pandemic including certain practices that are likely to continue after the pandemic concludes and this is one such aspect which is worthwhile for the DCISC to review during a future fact finding.	7/20PM 5/21FF	Close
14	F	He [Mr. McWhorter] reported most of the actions have now been completed and the system is in monitoring status and the FFT recommended the DCISC review the Auxiliary Building Ventilation System again during 2021 to assess the effectiveness of these corrective actions. The FFT concluded the Auxiliary Building Ventilation System was in fair health and should be reviewed to assess corrective actions in about one year.	7/20PM 4/21FF	Close

Oct 2020 PM 1	F	Dr. Peterson observed the DCISC has investigated the risk of wildfire, particularly from the perspective of the risk to the plant's offsite power supplies and has arranged for past presentations from a CalFire representative and, while the Committee has not seen any substantive risk from wildfire, given the recent wildfire activity with respect to frequency, intensity, and fuel buildup this last summer and with respect to climate change it may be prudent for the DCISC to reassess this issue.	10/20PM 5/21FF	Close
4	F	Mr. McWhorter suggested and the Committee Members agreed that the DCISC should request a report be made by PG&E representatives on DCPD decommissioning activities during DCISC public meetings on no less than an annual basis.	10/20PM	Each October PM? Close
5	F	Dr. Peterson stated this [some EP capabilities], knowledge and skill sets can be provided much quicker using a virtual platform such as are now being utilized in response to the pandemic would be an appropriate topic for a future fact-finding by the DCISC with particular emphasis placed upon the area of emergency response.	10/20PM 5/21FF	Close
8	F	The Members observed that scheduling the upcoming evaluated biennial emergency exercise on September 15, 2021, which for the 2021 exercise will have been extended by one additional year due to the COVID-19 pandemic, is very unfortunate as Yom Kippur, a holy day for persons of the Jewish faith commences that evening. Members directed that this information is brought to PG&E's attention and that the matter returned for review at the February 2021 public meeting concerning the DCISC's ability to send two observers to this exercise. Members directed that an item be added to the Open Items List concerning this matter. [DCPP initial response: "This will be evaluated as we get closer to the date and we will inform DCISC."]	10/20PM	Close
12	F	Consultant McWhorter reported that the DCISC fact finding team reviewed the first forced outage for a hydrogen leak on the Unit 2 main generator and as a second forced outage has now occurred there will need to be additional review at a future fact-finding. [Reviewed at 4/21FF: the RCE was currently expected to be completed in Summer 2021.]	10/20PM 4/21FF	3Q21FF 6/21PM or 10/21PM
13	F	Dr. Lam observed the Committee has reviewed cancelled projects on numerous occasions since 2017 to ensure PG&E's actions do not jeopardize safety for budgetary reasons and it remains critically important that the DCISC retain its focus and ensure safety remains the priority. [Last reviewed 9/20FF. Review in a year.]	10/20PM	9/21FF

Feb 2021 PM 1	F	The DCISC recommends that when PG&E considers decisions about the future management on-site of the spent fuel from DCCP's two reactor units, the risks arising from spent fuel management should be one part of the PG&E decision process and that process should be informed by the conclusions contained in the Study entitled "Probabilistic Risk Assessment of Nuclear Power Plant Spent Fuel Handling and Storage Programs: Methodology and Application to the Diablo Canyon Power Plant." (4.19.3) DCCP: "We agree with the recommendation and will incorporate it into our decision process on spent fuel management at the plant."	2/21PM	Monitor
2	F	The Committee then tentatively planned to have Consultant McWhorter stay over for the date of September 15, 2021, to observe the Evaluated Emergency Exercise to be possibly accompanied by Dr. Peterson.	2/21PM	9/21FF
3	F	The DCISC Fact-Finding Team reviewed the monitoring plan and found it satisfactory and the DCISC representatives assessed that Unit 2 was in a good position for restart. The DCISC representatives concluded the 2222 forced outage was properly managed and the DCISC should review the final RCE during a future fact-finding.	2/21PM	9/21FF
4	F	The DCISC Fact-Finding Team found the Cybersecurity Program to be effectively managed and recommended the DCISC follow-up on the results of the NRC inspection.	2/21PM	9/21FF
5	F	Two items were noted for follow-up by the NSOC in January 2021, those being the results of the corporate assessment of DCCP by the Institute of Nuclear Power Operations (INPO) and an item involving the Low Temperature Over-pressurization Protection (LTOP) System. Mr. McWhorter reported the DCISC representatives found the NSOC meeting to be effective and the DCISC should follow up on these two items.	2/21PM	3Q21FF
6	F	The team was concerned about the findings of the RCE and recommended that the DCISC should continue to follow this issue in future fact-finding and during future public meetings.	2/21PM	9/21FF
7	F	DCISC fact-finding team found the overall reduction in safety system functional failure to be acceptable and recommended that the DCISC cease looking at this issue on a recurring basis and instead continue to review NRC Maintenance Rule functional failures and NRC Maintenance Rule performance in general.	2/21PM	2Q22FF
8	F	The DCISC representatives concluded the plant's response to this event [LTOP] was appropriate but the DCISC should review this event when the root cause evaluation is completed.	2/21PM	9/21FF
9	F	Station (the "South Texas Project") has experienced a unit trip due to frozen feedwater lines. Dr. Peterson inquired whether DCCP would be reviewing Texas' experience for issues which could potentially impact DCCP. Mr. Guess replied that the South Texas Project reactor trip is believed to be related to the very low temperatures experienced which exceeded the plant's design basis and he agreed that an extent of condition review may be appropriate.	2/21PM	7/21FF

10	F	Mr. Wardell reported that Plant Status Control performance is now judged satisfactory and he recommended that review of this issue be closed on the DCISC's Open Items List.	2/21PM	Complete Close
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DCPP Systems/Components Reviewed Periodically

4 kV – Jan 2020

230 kV & 500 kV – Dec 2019

Aux Feedwater – Mar 2020

Aux Saltwater – Mar 2020

Aux Bldg Ventilation – **Apr 2021**

Chemical & Volume Control System and High Pressure Injection – Jan 2021

Component Cooling Water – Apr 2020

Compressed Air – Jul 2020

Condensate & Feedwater – Sep 2019

Containment Structure – Nov 2019

Containment Spray – Aug 2019

Containment Ventilation and H2 Purge – Aug 2020

Control Room Simulator – Nov 2020

Control Room Ventilation – Jan 2021

Digital Systems – Sep 2018

DC Power – Apr 2019

EDG – May 2020

Fire Protection & Detection Systems – Aug 2020

Nuclear Instrumentation & In-core Instrumentation – Sep 2020

Plant Protection System – **Mar 2021**

Radiation Monitoring – **Apr 2021**

Radwaste Processing – Nov 2020

Reactor Coolant System & Pumps – Aug 2018

RCS Process Control System – May 2020

Refueling Equipment – Dec 2018

RHR – Jan 2021

Rod Control & Indication – Sep 2020

Safety Injection Pumps – Jan 2021

Spent Fuel Pool Cooling & HVAC – May 2018

Steam Generators – Aug 2020

Special Protection System – Mar 2020

Turbine-Generator – Dec 2020

DCPP Programs Reviewed Periodically

ALARA – Sep 2019

Air Operated Valves – Dec 2020

Benchmarking – Nov 2018

Boric Acid Corrosion Control – **Apr 2021** (review biennially)

Buried Piping & Tanks – Jul 2020

Chemistry – Aug 2018

Cranes – Sep 2019

Configuration Management – May 2019

Corrective Action – CARB – **Apr 2021**

Emergency Preparedness Exercises – Nov 2018

Employee Concerns Program – Aug 2020

Equipment Environmental Qualification – Mar 2020

Equipment Reliability – Jul 2020

Excellence Plan – March 2018

Fire Doors & Door Life Cycle Mgm't. Plan – Mar 2019

Fire Protection Program (NFPA-805) – **May 2021**

FLEX Program – Apr 2019

Flow Accelerated Corrosion – Apr 2019

Foreign Material Exclusion – Dec 2019

June 23-24, 2021 Public Meeting
First Draft 6/15/21

FF = Fact-finding Meeting

PM = Public Meeting

Q = Quarter

In-service Inspection Program – Apr 2019
 Integrated Risk Assessment Program – Apr 2020
 Large Motors – Jan 2019
 Long-Term Capital Planning Process – Dec 2016
 MIDAS – Aug 2018
 Maintenance Rule – *Apr 2021*
 Margin Management Program – May 2020
 Motor Operated Valves – Dec 2020
 Notification Review Team – Mar 2020
 Nuclear Fuel Program – *Mar 2021*
 On-Line Maintenance – Apr 2020
 Operating Experience – Aug 2018 (review biennially)
 Operability Assessment Program – Mar 2017
 Operational Decision Making – Sep 2020
 PRA Programs (non-seismic) – Sep 2017
 Performance Improvement – Apr 2019
 Performance Review Quarterly Meeting – *Apr 2021*
 Plant Health Committee – May 2020
 Reactivity Management – *May 2021*
 Safety-Security Interface – Dec 2020
 Self-Assessment – Aug 2020
 Single Point Vulnerabilities – Sep 2019
 Seismic PRA – Sep 2017
 Seismically Induced System Interactions – Nov 2020
 Software QA -- March 2018
 Spent Fuel Management – *Apr & May 2021*
 System Engineering – Nov 2019
 Transformers, Large – Jan 2021
 Troubleshooting – Jan 2020
 Tsunami Hazard Analysis – Sep 2017
 Vibration Monitoring – *Mar 2021*

June 23-24, 2021 Public Meeting
 First Draft 6/15/21

FF = Fact-finding Meeting

PM = Public Meeting

Q = Quarter

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	June 23, 2021
AGENDA ITEM:	V-C
AGENDA TITLE:	Nomination and Election of DCISC Chair & Vice-Chair for the July 1, 2021 - June 30, 2022 Term

CONSENT [☐]

ACTION [☒]

INFORMATION [☐]

Staff Summary: Pursuant to the Committee's Policy No.1, a Chair shall be selected from the Committee at the second public meeting of the calendar year, to serve for the next annual report period and shall preside at all meetings, coordinate the activities of the Committee and its members, as required, and execute all documents in the name of the Committee during that period. When appropriate, the Chair shall designate a DCISC members to execute consultant contracts and contract documents on behalf of the chair. A Vice-Chair shall also be selected at the second public meeting and shall act in the absence of the Chair.

RECOMMENDED COMMITTEE ACTION: On motion by a member, Committee members should be nominated and elected to the offices of DCISC Chair and Vice-Chair.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	June 23, 2021
AGENDA ITEM:	VI-B
AGENDA TITLE:	Documents Provided to the Committee
CONSENT ☐	ACTION ☐ INFORMATION ☒

Staff Summary: Attached for your information are copies of the transmittal memoranda which list the various documents provided to the Committee by PG&E since your last public meeting in February 2021.

RECOMMENDED COMMITTEE ACTION: None, information item only.

January
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
1/27/2021	DCL-21-008	Owner's Activity Report for Unit 1 Twenty-Second Refueling Outage

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
1/26/2021	DIABLO CANYON POWER PLANT, UNITS 1 AND 2 - INTEGRATED INSPECTION REPORT 05000275/2020004 AND 05000323/2020004

D. PSRC Documents (PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes		There are no PSRC minutes for this month.

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
1 WGE	SAPN 51103653	DA-24 hr telephone report to the NRC
2 WGE	SAPN 50591454	LTCA -Tornado Missile Lic. Basis Ques
2 WGE	SAPN 50592094	LTCA-Rev Missile Assump, Calc 65-T-825
2 WGE	SAPN 51079217	DA-U2 Sys 39A SR Rad Monitor - Goal Sett
2 WGE	SAPN 51091478	DA- DEG 2-1 oil leak
2 WGE	SAPN 51093297	DA-Door 144 found unsecured - HU Eval
2 WGE	SAPN 51100767	DA-MW 26 OOS top head hit by man lift
ACE	SAPN 51088472	DA-NRC Concern: Scaffold in DG 1-1 room
	SAPN 51099523	DA-U2 SG 2-2 Safety Lifted Early
RCE	SAPN 51083213	Leak on AFW Piping After LCV-111
Eff. Eval	SAPN 51026480	EFEV: ASW PP 2-1 Motor Bearing Degraded

January
List of Documents Transmitted Electronically

1/31/2021		List of DN 5.1 and 5.2 Created 1-1-2021 – 1-31-2021
1/31/2021		DCPP 1 WGE and 2 WGE Notifications Completed 1/1/2021 – 1/31/2021
1/25/2021		DCPP CAP Station Index
1/11/2021		CAP Summary
1/11/2021		20 Oldest Non-LTCA DA Notifications as of 1/11/2021
1/25/2021		Open RCEs As of 1/25/2021
1/12/2021		Performance Improvement Status Summary
12/31/2020		DN DA Initiation Rate

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
1/5/2021		Quality Digest, January Edition 2021
1/21/2021	QVA # 2021-AS-01	Safety Issue Resolution

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel Report for this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
1/11/2021	SAPN 51080792	Benchmark – Virtual Learning
1/13/2021	SAPN 51078417	QHSA for CA ELAP changes
1/19/2021	SAPN 51097955	Pre-Internal Audit QHSA for DCPD Records

I. Performance Information (PIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
1/11/2021		Generation Operating Plan 2021 – 2025, No new updates this month.
12/17/2020	PIR	Diablo Canyon Power Plant ; Plant Performance Improvement Report; Achieving Results; Data: November 2020
1/21/2021	PIR	Diablo Canyon Power Plant ; Plant Performance Improvement Report; Achieving Results; Data: December 2020

January
List of Documents Transmitted Electronically

1/28/2021	PRM	Performance Review Meeting Agenda
1/11/2021		Performance Improvement Status Summary
1/21/2021		January 2021 PI Status Summary
1/18/2021		January 2021 Engineering Services Performance Improvement Dashboard
1/13/2021		January 2021 Maintenance PI Dashboard
1/13/2021		January 2021 Operations Services Performance Improvement Dashboard
1/11/2021		January 2021 Security & Emergency Services Performance Improvement Dashboard

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs	1/12/2021	DCPP Update - Operational Decision Making (ODM) Meeting on Unit 2
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

N. Miscellaneous

Date	Title
	There are no miscellaneous documents for this month.

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	202101	T+1 Performance Critique
	202102	T+1 Performance Critique
	202103	T+1 Performance Critique
	202104	T+1 Performance Critique

February
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
2/3/2021	DCL-21-012, DIL-21-001	Emergency Plan Update
2/4/2021	DCL-21-011	Request for One-Time Exemption from Select 10 CFR 55.59 Requirements
2/4/2021	DCL-21-013	(OUO) Request for a Temporary Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) and Subsection A.7, Regarding Annual Force-On-Force Exercises, Due to Coronavirus Disease 2019 Pandemic.

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
	There is no incoming correspondence for this month.

D. PSRC Documents (PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes		There are no PSRC documents for this month.

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
2 WGE	SAPN 51072525	DA-Adverse Trend: Incipient Cloud Chambe
2 WGE	SAPN 51081138	DA-Neg trend: Pri & B/u MET Tower Aspirat
2 WGE	SAPN 51086295	DA-8/25/20 DEP Drill Classification Fail
2 WGE	SAPN 51091473	DA-Inadequate Clearance Boundar
2 WGE	SAPN 51094793	DA-Work Order attached to wrong clearanc
2 WGE	SAPN 51097839	DA-Trend Clearance Issues
Eff. Eval		There are no effectiveness evaluations for this month.
CE	SAPN 51095730	DA-Unit 1 PORVs opened momentarily
CE	SAPN 51098549	DA-NSOC ESI PI 20-01: Shortfalls in CAP

February
List of Documents Transmitted Electronically

2/28/2021		List of DN 5.1 and 5.2 Created 2-1-21 – 2-28-21
2/28/2021		DCPP 1 WGE and 2 WGE Notifications Completed 2/1/21 – 2/28/21
2/22/2021		DCPP CAP Station Index
2/8/2021		CAP Summary
2/4/2021		Open LTCA DA Notifs Station Significance 1 & 2 as of 2/4/21
2/4/2021		20 Oldest Non-LTCA DA Notifications as of 2/4/2021
2/22/2021		Open RCEs As of 2/22/21
2/8/2021		Performance Improvement Status Summary
		SAPNs Initiated per Month August 2019 – January 2021

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
2/2/2021		Quality Digest, February Edition 2021
2/4/2021	#2021-IA-01	2021 Chemistry and Environmental Operations Audit
2/1/2021	#2021-AS-2	Assessment of Engineering Evaluations
2/4/2021	#2021-AS-3	Station Equipment Reliability

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
2/12/2021		Nuclear Safety Culture Review Report for the 1st Period 2021

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
2/16/2021	SAPN 51076798	ISI Benchmark EOL Insp Reqs
2/19/2021	SAPN 51021455	2019 Safety Culture Assessment
2/10/2021	SAPN 51071331	Perform Formal SA: Elec Safety 2020
2/1/2021	SAPN 51033736	IST QHSA tracking
1/29/2021	SAPN 51069553	1R22 Post-Outage HU QHSA

February
List of Documents Transmitted Electronically

I. Performance Information (PIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
1/11/2021		Generation Operating Plan 2021 – 2025, No new updates this month.
3/4/2021	PPIR	Diablo Canyon Power Plant; Plant Performance Improvement Report; Achieving Results; Data: January 2021
2/11/2021		February 2021 Security & Emergency Services Performance Improvement Dashboard
2/16/2021		February 2021 Engineering Services Performance Improvement Dashboard
2/16/2021		February 2021 Maintenance PI Dashboard
2/16/2021		February 2021 Operations Services Performance Improvement Dashboard
2/8/2021		February 2021 PI Status Summary
2/22/2021		February 2021 PI Status Summary

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

N. Miscellaneous

Date	Title
	There are no miscellaneous documents for this month.

February
List of Documents Transmitted Electronically

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	202105	T+1 Performance Critique
	202106	T+1 Performance Critique
	202107	T+1 Performance Critique
	202107	T+1 Performance Critique
	January	T+1 Monthly Performance Critique 2101-2104

March
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
3/1/2021	DIL-21-003	Annual Radioactive Effluent Release Report for 2020
3/29/2021	DCL-21-020	License Amendment Request 21-03 Request for Revision to Technical Specification 3.8.1, "AC Sources - Operating" to Support Diesel Fuel Oil Transfer System Component Planned Maintenance
3/31/2021	DCL-21-026	Decommissioning Funding Report for Diablo Canyon Power Plant, Units 1 and 2
3/31/2021	DCL-21-027	2020 Diablo Canyon Power Plant (DCPP) 10 CFR 50.54(t) Assessment
3/31/2021	DCL-21-028	2020 Diablo Canyon Power Plant (DCPP) 10 CFR 50.54(t) Assessment

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
3/2/2021	Request for additional information for Diablo Canyon Generic Letter 2004-02 Submittal (L-2017-LRC-0000)
3/3/2021	DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 – EXEMPTION FROM ANNUAL FORCE-ON-FORCE EXERCISE REQUIREMENT OF 10 CFR PART 73, APPENDIX B, "GENERAL CRITERIA FOR SECURITY PERSONNEL," SUBSECTION A.7 (EPID L-2021-LLE-0008 [COVID-19])
3/3/2021	ANNUAL ASSESSMENT LETTER FOR DIABLO CANYON POWER PLANT, UNITS 1 AND 2 (REPORT 05000275/2020006 AND 05000323/2020006)
3/11/2021	DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – TRIENNIAL FIRE PROTECTION INSPECTION REPORT 05000275/2021010 AND 05000323/2021010
3/12/2021	DIABLO CANYON POWER PLANT – NOTIFICATION OF INSPECTION (NRC INSPECTION REPORT 05000275/2021002, 05000323/2021002) AND REQUEST FOR INFORMATION
3/31/2021	DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – CYBER SECURITY INSPECTION REPORT 05000275/2021403 AND 05000323/2021403

D. PSRC Documents (PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes		There are no PSRC minutes for this month.

March
List of Documents Transmitted Electronically

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
2 WGE	SAPN 50945755	LTCA Eval air comp config vs lic basis
2 WGE	SAPN 51088341	DA-NRC Green Finding - OE reviews
2 WGE	SAPN 51091733	DA-CS-1-37 found Open
2 WGE	SAPN 51105724	DA-QAAF - CAP A-12 records not IAW reqme
2 WGE	SAPN 51105994	DA-Low Oxygen Alarm U2 Containment
Eff. Eval		There are no effectiveness evaluations for this month.
3/31/2020		List of DN 5.1 and 5.2 Created 3-1-21 – 3-31-21
3/31/2020		DCPP 1 WGE and 2 WGE Notifications Completed 3/1/21 – 3/31/21
3/29/2021		DCPP CAP Station Index
3/8/2021		CAP Summary
3/29/2021		Open RCEs As of 3/29/2021
3/31/2021		SAPNs Initiated Per Month

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
3/2/2021		Quality Digest, March Edition 2021
2/25/2021	Audit #2021-IA-03	2021 Emergency Preparedness, FLEX, and SFP Instrumentation Audit
3/1/2021	QVA # 2021-AS-04	2R22 Early Start
3/18/2021	QVA # 2021-AS-5	Assessment of Engineering Work Product Review Team
3/31/2021	QVA # 2021-AS-7	Assessment of Station Response to 2R22 Human Performance Trend

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel Report for this month.

March
List of Documents Transmitted Electronically

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
3/10/2021	SAPN 51110054	FAC Program - Winter 2021 CHUG Trip Rpt
3/18/2021	SAPN 51109489	Industry Benchmark - Non-DEP Failure
3/23/2021	SAPN 51109540	Industry Benchmark - ACAD 07-002
3/29/2021	SAPN 51054289	Decom Benchmarking - Indian Point
3/11/2021	SAPN 51061510	Formal Self Assessment ER through OR Len
3/23/2021	SAPN 51078318	Jan 2021 71111.11 FSA
3/18/2021	SAPN 51109182	-
3/26/2021	SAPN 51050752	Track Quick Hit Self-Assess for OM1.ID6
3/26/2021	SAPN 51108445	Perform a QHSA against NRC IP 71124.01

I. Performance Information (PIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
1/11/2021		Generation Operating Plan 2021 – 2025, No new updates this month.
	PPIR	Diablo Canyon Power Plant; Plant Performance Improvement Report; February Data: April 2, 2021
3/8/2021		March 2021 Security and Emergency Services Performance Improvement Dashboard
3/11/2021		March 2021 Operations Services Performance Improvement Dashboard
3/13/2021		March 2021 Engineering Services Performance Improvement Dashboard
3/15/2021		March 2021 Maintenance PI Dashboard
3/8/2021		March 2021 PI Status Summary
3/22/2021		March 2021 PI Status Summary

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

March
List of Documents Transmitted Electronically

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs		There are no ODMs for this month.
POA		There are no new POAs for this month.
4/5/2021		Daily Load Profile

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
Draft	Calc No. SDP21-03 Rev. 0	Unit 2 SI-8803B Degraded

N. Miscellaneous

Date	Title
	There are no miscellaneous documents for this month.

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	202109	T+1 Performance Critique
	202110	T+1 Performance Critique
	202111	T+1 Performance Critique
	202112	T+1 Performance Critique
	202113	T+1 Performance Critique
	202114	T+1 Performance Critique
		T+1 February Monthly Performance Critique
		T+1 March Monthly Performance Critique

April
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
4/6/2021	2021-002	Accept welds for use as-is

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
4/1/2021	DCL-21-022	2020 Annual Radiological Environmental Operating Report
4/1/2021	DCL-21-019	Supplement to License Amendment Request 20-03 Proposed Technical Specifications and Revised License Conditions for the Permanently Defueled Condition
4/1/2021	DCL-21-030, HBL-21-005	2021 Annual Statement of Insurance for Pacific Gas and Electric Company's Diablo Canyon Power Plant and Humboldt Bay Power Plant
4/8/2021	DCL-21-031	Annual Report of Occupational Radiation Exposure for 2020
4/15/2021	DCL-21-035	Diablo Canyon Units 1 and 2 - 1Q2021 - PI Data Elements (QR)
4/15/2021	DCL-21-034	Response to Request for Additional Information on Final Supplemental Response to Generic Letter 2004-02
4/20/2021	DCL-21-023	2020 Annual Radioactive Effluent Release Report
4/29/2021	DCL-21-039	Alert and Notification System Design Report, Revision 5

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
3/31/2021	(OUO) DIABLO CANYON POWER PLANT, UNITS 1 AND 2 - CYBER SECURITY INSPECTION REPORT 05000275/2021403 AND 05000323/2021403
4/1/2021	DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 – EXEMPTION FROM SELECT REQUIREMENTS OF 10 CFR PART 55, “OPERATORS LICENSES” (EPID L-2021-LLE-0007)
4/12/2021	DIABLO CANYON POWER PLANT, UNITS 1 AND 2 –NOTIFICATION OF NRC DESIGN BASES ASSURANCE INSPECTION (PROGRAMS) (05000275/2021011 AND 05000323/2021011) AND INITIAL REQUEST FOR INFORMATION
4/14/2021	Request for additional information - Diablo Canyon proposed technical specifications and revised license conditions for the permanently defueled condition (EPID: L-2020-LLA-0261)

D. PSRC Documents (PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes		There are no PSRC Minutes for this month.
PSRC Memo	4/12/2021	Plant Staff Review Committee; Members and Alternates
	4/13/2021	Plant Staff Review Committee; Members and Alternates

April
List of Documents Transmitted Electronically

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
1 WGE		There are no WGE 1s for this month.
2 WGE	SAPN 51054198	LTCA -Flush water introduced to waterbox
2 WGE	SAPN 51060524	DA-DCPP SPS Maintenance Alarms
2 WGE	SAPN 51079216	DA- Loss of AVSS cameras
2 WGE	SAPN 51093604	DA-QARMA - Fall Protection Program Issue
2 WGE	SAPN 51094959	DA-Both SR NIS de-energized during SSPS
2 WGE	SAPN 51095733	DA- Adverse Trend I&C Status Cont -NSOC
2 WGE	SAPN 51098551	DA-QARMA: PU&A and HP Analysis
2 WGE	SAPN 51106818	DA-QAAF - RP quality records not RMS'd
2 WGE	SAPN 51108540	DA-QAAF: Shift Watch List
2 WGE	SAPN 51110326	DA-OM6.ID1- Finger Laceration - MC-FM1
Eff. Eval		There are no effectiveness evaluations for this month.
4/5/2021		DA Initiation
4/14/2021		CARB High and Medium CAP Items – 5 Oldest
4/19/2021		CARB High and Medium CAP Items – 5 Oldest
4/22/2021		CARB High and Medium CAP Items – 5 Oldest
4/30/2021		List of DN 5.1 and 5.2 Created 4-1-21 – 4-30-21
4/31/2021		DCPP 1 WGE and 2 WGE Notifications Completed 4/1/21 – 4/30/21
4/26/2021		DCPP CAP Station Index
4/5/2021		CAP Summary
4/26/2021		20 Oldest Non-LTCA DA Notifications as of 4/26/2021
4/26/2021		Open RCEs As of 4/26/2021

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
4/5/2021		Quality Digest, April Edition 2021
4/8/2021	#2021-IA-05	2021 Applied Technology Services Quality Program Audit

April
List of Documents Transmitted Electronically

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel Report for this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
5/6/2021	SAPN 50994647	Informal Benchmark - Mirion Users Group
4/11/2021	SAPN 51065071	Cyber Security Shearon Harris Benchmark
4/20/2021	SAPN 51116149	Sec - Weapons Safety Benchmark
4/15/2021	SAPN 51003228	RWMP Intertidal Scope Self-Assessment
4/21/2021	SAPN 51113201	QHSA - Fall Protection Program
4/27/2021	SAPN 51116726	QHSA on SM Qualification Program

I. Performance Information (PIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
1/11/2021		Generation Operating Plan 2021 – 2025, No new updates this month.
4/9/2021	PIR	Diablo Canyon Power Plant; Plant Performance Improvement Report; Data: March 2021
4/13/2021		April 2021 PI Status Summary
4/27/2021		April 2021 PI Status Summary
4/8/2021		April 2021 Security & Emergency Services Performance Improvement Dashboard
4/13/2021		April 2021 Operations Services Performance Improvement Dashboard
4/14/2021		April 2021 Engineering Services Performance Improvement Dashboard
4/14/2021		April 2021 Maintenance PI Dashboard

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

April
List of Documents Transmitted Electronically

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

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N. Miscellaneous

Date	Title
	There are no miscellaneous documents for this month.

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	202115	T+1 Performance Critique
	202116	T+1 Performance Critique
	202117	T+1 Performance Critique

May
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
5/20/2021	DCL-21-043	Report of Completion of Implementation of Risk-Informed Evaluation Methodology to Address Open Phase Condition

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
5/4/2021	Acceptance Review - Diablo Canyon Request to Revise Technical Specification 3.8.1, "AC Sources - Operating" to Support Diesel Fuel Oil Transfer System Component Planned Maintenance (EPID: L-2021-LLA-0056)
5/7/2021	DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – INTEGRATED INSPECTION REPORT 05000275/2021001 AND 05000323/2021001 AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION INSPECTION REPORT 07200026/2021001

D. PSRC Documents (PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes	2020-012	Main Generator Extent of Condition
	2020-013	Unit 2 Main Generator Extent of Condition Unit 2 AFW Piping Repairs and Extent of Condition Unit 2 Rod Control Repairs Unit 2 NI-31 Replacement Readiness for Restart – Mode 3 to Mode 2 Change Readiness for Restart – OP1.DC1
	2020-014	License Amendment Request 20-01, Exigent Request for Revision to Technical Specification 3.7.5, "Auxiliary Feedwater System"
	2020-015	Response to NRC Request for Additional Information Regarding "License Amendment Request 20-01, Exigent Request for Revision to Technical Specification 3.7.5, 'Auxiliary Feedwater System'"
	2020-019	STRIDES analysis for extending the frequency for performance of STP R-1A Emergency Plan, Section 7, Revision 5.02
	2020-021	Readiness for Restart – Mode 3 to Mode 2 Change
	2020-022	OP L-0 OP1.DC1
	2020-023	License Amendment Request 20-03
	2021-005	Readiness for Restart – Mode 5 to Mode 4 Change

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List of Documents Transmitted Electronically

	2021-007	Readiness for Restart – Mode 3 to Mode 2 Change Readiness for Restart – OP1.DC1
	2021-008	DCL-21-040, Responses to NRC Requests for Additional Information on LAR 20-03, Proposed Technical Specifications and Revised License Conditions for the Permanently Defueled Condition

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
2 WGE	SAPN 51063454	DA-4KV PDS/Yaskawa SF6 breakers adv. tre
2 WGE	SAPN 51073881	DA-NWCM - NCIG-01 Weld Inspect Criteria
2 WGE	SAPN 51093452	DA-Turbo bracket cracked through
2 WGE	SAPN 51094959	DA-Both SR NIS de-energized during SSPS
2 WGE	SAPN 51096253	DA-STP P-AFW-A11 low RPM
2 WGE	SAPN 51096255	DA-AFWP1-1 Locknut loosened
2 WGE	SAPN 51096256	DA-AFW AS FOUND PUMP dP / RPM Too High
2 WGE	SAPN 51096257	DA-AFW -11 Pump Governor Knob Not Adj Sp
2 WGE	SAPN 51098391	DA-U2 Sys 23B Goal Setting
2 WGE	SAPN 51116795	DA-QAAF: Inconsistent Logging of M&TE Equ
Eff. Eval	SAPN 51036734	EFEV for Polar Crane MHOS Trip
Eff. Eval	SAPN 51050807	Effectiveness Evaluation - SGI Unsecured
Eff. Eval	SAPN 51103890	IER L2-15-23 Effectiveness Review
4/29/2021		High and Medium Cap Items – 5 Oldest
5/10/2021		High and Medium Cap Items – 5 Oldest
5/24/2021		High and Medium Cap Items – 5 Oldest
5/31/2021		List of DN 5.1 and 5.2 Created 5-1-21 – 5-31-21
5/31/2021		DCPP 1 WGE and 2 WGE Notifications Completed 5/1/21 – 5/31/21
5/24/2021		DCPP CAP Station Index
5/3/2021		CAP Summary

May
List of Documents Transmitted Electronically

5/21/2021		Open LTCA DA Notifs Station Significance 1 & 2 as of 5/19/2021
5/19/2021		Open LTCA DA Notifs Station Significance 3 as of 5/19/2021
5/19/2021		20 Oldest Non-LTCA DA Notifications as of 5/19/2021
5/24/2021		Open RCEs As of 5/24/2021
5/24/2021		May 2021 PI Status Summary
April 2021		SAPNs Initiated per Month

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
5/3/2021		Quality Digest, May Edition 2021
4/22/2021	#2021-IA-04	2021 Fire Protection Audit
4/29/2021	#2021-IA-02	2021 Fitness for Duty, Access Authorization, and Personnel Access Data System Audit

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel Report for this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
5/20/2021	SAPN 51032790	2019 FPE Inf. Benchmark- Reg4/NEIL Wkshp
5/18/2021	SAPN 51103608	Benchmark Nuclear fleets CE thresholds
5/18/2021	SAPN 51118983	Benchmark # PRA Model Update survey
5/13/2021	SAPN 51104467	Document QHSA NRC IP 71124.04

I. Performance Information (PIIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
1/11/2021		Generation Operating Plan 2021 – 2025, No new updates this month.
6/3/2021	PIIR	Diablo Canyon Power Plant; Plant Performance Improvement Report; Data: April 2021
5/6/2021		May 2021 PI Status Summary

May
List of Documents Transmitted Electronically

5/20/2021		May 2021 PI Status Summary
5/10/2021		May 2021 Security & Emergency Services Performance Improvement Dashboard
5/12/2021		May 2021 Operations Services Performance Improvement Dashboard
5/13/2021		May 2021 Maintenance PI Dashboard

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

N. Miscellaneous

Date	Title
	There are no miscellaneous documents for this month.

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	202118	T+1 Performance Critique
	202119	T+1 Performance Critique
	202120	T+1 Performance Critique
	202121	T+1 Performance Critique
	Apr Mo Pkg	T+1 Monthly Performance Critique 2114-2117

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	June 23, 2021
AGENDA ITEMS:	VII-A & B and XIII C & D
AGENDA TITLE:	Consultant & Legal Counsel Reports; Receive, Approve and Authorize Transmittal of Fact Finding Reports, and receive report by Asst. Legal Counsel.

CONSENT [] ACTION [X] INFORMATION [X]

Staff Summary: It is anticipated that oral or written reports will be presented at the meeting by Technical Consultants Mr. Wardell and Mr. McWhorter and DCISC Assistant Legal Counsel Mr. Rathie concerning items listed or on other matters.

Fact finding reports may be submitted for consideration and comment by members and consultants since the last public meeting of the DCISC in February 2021. These reports may be received by the Committee, approved as to form and content and be authorized for transmittal to PG&E for its consideration and response. The Committee reserves the right to revise any fact-finding prior to the inclusion in an Annual Report. Fact finding reports in their final "as accepted form" become a part of the next DCISC Annual Report. Fact Finding Reports and are available for public inspection following their acceptance by the Committee at a public meeting.

RECOMMENDED COMMITTEE ACTION:

Receive reports by Consultants and Assistant Legal Counsel reports and provide direction.

Motions to accept Fact Finding Report concerning fact-findings conducted on March 17-18, April 27-28 and May 18-19, 2021.