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Recommendation No. P11/24FF-3.11:

PG&E should continue to evaluate why a 2018 Root Cause Evaluation for a failed Auxiliary Saltwater Pump motor bearing did not result in sufficiently effective procedure changes. (Section 4.3)

PG&E Response to P11/24FF-3.11:

Pacific Gas and Electric Company (PG&E) reviewed the 2018 Root Cause Evaluation (RCE) and determined that the initial procedure revisions did not fully meet the intent and expectations of the root cause team. Corrective actions identified through this evaluation, including procedure revisions validated by plant personnel, provide assurance that measures are in place to prevent recurrence of accelerated bearing degradation. Additionally, Diablo Canyon Power Plant (DCPP) procedures governing RCEs have been updated to require that any procedure revisions implementing corrective actions are reviewed by the Root Cause Team Lead, ensuring alignment and preventing similar issues in future evaluations.

Details of PG&E's response to this recommendation were discussed with the Diablo Canyon Independent Safety Committee (DCISC) during a September 2025 fact-finding meeting and the fact-finding team concluded that the appropriate corrective actions had been taken, and the DCISC's recommendation to PG&E should be closed.

Recommendation No. P1/25FF-3.3A:

PG&E should review its cause evaluation processes and initiate actions to ensure that deficiencies observed via the Organizational Learning Tool and Safety Culture Assessment are captured and tied to the initiation of appropriate corrective actions. (Section 4.3)

PG&E Response to P1/25FF-3.3A:

In response to this recommendation, DCPP procedures were reviewed to validate the current cause evaluation process ensures deficiencies observed via the Organizational Learning Tool (OLT) and Safety Culture Assessment are captured and integrated into the corrective action development.

In accordance with DCPP procedures, during the cause and corrective action determination phase of a root cause evaluation, the OLT and Safety Culture Assessments are reviewed, and any gaps or deficiencies are incorporated into either corrective or prudent actions. The OLT and Safety Culture sections of the respective RCE reports document whether the corrective actions properly address the OLT and Safety Culture concerns or are created as new actions.

Details of PG&E's response to this recommendation were discussed with DCISC during an August 2025 fact-finding meeting and the fact-finding team concluded PG&E's response was satisfactory and the open item was closed.

Recommendation No. P1/25FF-3.3B:

PG&E should review its cause evaluation processes and initiate actions to ensure that periodic trending is performed across the multiple Organizational Learning Tools and Safety Culture

Assessments that are performed as a part of Cause Evaluations and Root Cause Evaluations. (Section 4.3)

PG&E Response to P1/25FF-3.3B:

In response to DCISC recommendations, PG&E strengthened its current trending process where the codes were reviewed in aggregate along with lower-level Work Group Evaluation codes by implementing focused trending of cause codes and Safety Culture codes from Cause Evaluations (CEs) and RCEs, with reviews conducted during monthly Continuous Performance Monitoring meetings and Safety Culture Monitoring Panels. In addition, periodic analyses, including six-month reviews of CE cause codes and a five-year historical analysis shared with Performance Improvement leadership, provide comprehensive oversight. These actions are tracked in the Corrective Action Program to ensure accountability and continuous improvement. Collectively, these measures establish recurring, data-driven reviews that enable early trend detection and timely corrective actions.

Details of PG&E's response to this recommendation were discussed with DCISC during an August 2025 fact-finding meeting and the fact-finding team concluded PG&E's response was satisfactory and the open item was closed.

Recommendation No. P12/24FF-3.6:

PG&E should review why an extent of condition review for an unbraced cabinet found by the DCISC in July 2024 did not prevent the identification of a similar condition by the DCISC in December 2024. This recommendation was subsequently completed and closed during this period. (Section 4.20)

PG&E Response to P12/24FF-3.6:

PG&E addressed the DCISC recommendation by revising DCPD standards for bracing office furniture, cabinets, and storage racks to include clear requirements for documenting discrepancies and generating corrective action notifications. A sitewide communication was issued to ensure awareness of the revised policy. A comprehensive inspection of all office furniture, cabinets, and storage racks was performed, with discrepancies documented and corrected; labeling was implemented to identify weighted cabinets not affixed to structural elements. Additionally, a recurring annual inspection order was established to ensure ongoing compliance with the bracing policy. These actions provide a systematic approach to identification, correction, and prevention of similar conditions, ensuring sustained compliance and reducing the likelihood of recurrence.

As noted in your report, these actions were appropriate, are expected to prevent recurrence of similar issues, and this recommendation has been closed.

Recommendation No. P4/25FF-3.6:

PG&E should review if DCPD should have considered developing FLEX guidelines for providing an alternative discharge path for the Auxiliary Saltwater (ASW) System following a Beyond

Design Basis event that may cause a collapse of the Discharge Structure or otherwise obstruct the ASW System discharge. (Section 4.23)

PG&E Response to P4/25FF-3.6:

PG&E reviewed the DCISC recommendation regarding Diverse and Flexible Coping Strategies (FLEX) strategies for an alternative Auxiliary Saltwater (ASW) discharge path following a potential collapse or obstruction of the discharge structure. The DCPD FLEX program adheres to Nuclear Energy Institute (NEI) 12-06, Revision 2, which establishes symptom-based coping strategies to maintain key safety functions under beyond-design-basis conditions. Existing FLEX guidelines already address scenarios involving discharge structure impairment: (1) partial blockage would not affect ASW flow due to its relatively low discharge rate; (2) complete blockage would be mitigated by deploying FLEX heavy equipment for debris removal; and (3) severe damage would be addressed by routing discharge through hoses or flexible couplings to the ocean. These strategies ensure multiple, feasible alternatives for maintaining ASW function, providing sufficient assurance that plant safety can be preserved without additional FLEX guidelines.

Recommendation No. P12/24FF-3.2:

PG&E should further expand their use of electronic procedures-type applications, subject to proper human systems integration, because the improved human performance and documentation of work can directly improve the safety of operations. (Section 4.27)

PG&E Response to P12/24FF-3.2:

PG&E appreciates the Committee's recommendation to expand the use of electronic procedure-type applications to improve human performance and operational safety.

DCPD is actively implementing the NextAxiom Dynamic Work Execution Platform® to achieve these objectives. In December 2024, PG&E purchased the Dynamic Instructions (DI) and Revision Work Flow (RWF) modules, and in December 2025, successfully delivered the first DIs to the test environment. Following sufficient testing and validation, these DIs will transition into the production environment.

In parallel, PG&E is developing an RWF process to enable dynamic procedure revision routing. Together, these implementations will enhance work processes, reduce human error, and eliminate inefficiencies.

DCPD remains strongly committed to this initiative, as demonstrated by our participation in the NextAxiom Users Group Conference, and by engaging team members to benchmark best practices and enhance expertise in dynamic work processes.

Recommendation No. P/SRT-1:

The Committee recommends the development of a set of kinematically constrained structural models for reverse faults underlying the Irish Hills that can explain the folding observed since 5 Ma. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-2:

The Committee recommends dating of low-stand abrasion platforms offshore, south of the Irish Hills, to further constrain the rate of footwall subsidence and its contribution to the Southwest Boundary Zone slip rate. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-3:

The Committee recommends monitoring of IRSL-dating efforts and reassessment, if necessary, of the MIS 5 age assignments for the Q1 and Q2 terraces surrounding the Irish Hills. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-4:

The Committee recommends further investigation of potential strike-slip faulting along the Los Osos trend and its impacts on the pattern of marine-terrace uplift. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-5:

The Committee recommends that PG&E should follow up the SRT's preliminary work with a more complete study of the available GPS data. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-6:

The Committee recommends that the fault slip models that underlie the DCCP Seismic Source Characterization should be developed into kinematic and mechanical models that can predict the interseismic deformation and can thus be directly tested against the GPS data. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-7:

The Committee recommends that PG&E should compute the relative contributions of strike-slip and reverse faulting to the regional deformation predicted by the SSC24 (Seismic Source Characterization 2024) slip models and compare the values with the geodetic constraints. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-8:

The Committee recommends Geologic slip-rate information should be acquired from the Rinconada and Huasna faults to permit better modeling of the shear component evident in the GPS data. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-9:

The Committee recommends that PG&E should conduct modeling experiments to ascertain the sensitivity of DCPH hazard to the SSC modifications recommended by the SRT. (Exhibit D.12, Section 3.0)

PG&E Response to No. P/SRT-1 through 9:

PG&E will evaluate the Seismic Review Team (SRT) recommendations to identify items that are not covered by the Long-Term Seismic Program (LTSP), are technically defensible, and are likely to yield meaningful results. For qualifying topics, sensitivity studies and assessments will be conducted in 2026 to determine potential impacts on seismic hazard characterization. Findings will guide research prioritization and be reviewed by the DCISC SRT and provided to the Independent Peer Review Panel. This approach was discussed with the DCISC in September and October 2025 and ensures systematic integration of significant seismic hazard characterization insights into LTSP planning.