



July 13, 2000

PG&E Letter DCL-00-100

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Transmittal of Revision 3 to WCAP-15128 and 15129

Dear Commissioners and Staff:

The following Westinghouse Electric Company LLC ("Westinghouse") topical reports are transmitted as Enclosure 1 to this letter.

- WCAP-15128, Revision 3 (Proprietary Class 2), "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections," June 2000
- WCAP-15129, Revision 3 (Non-Proprietary Class 3), "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections," June 2000

Revision 3 of these reports provide the technical bases for a depth based steam generator tube alternate repair criteria (ARC) for axial primary water stress corrosion cracking indications at dented tube support plate intersections. The ARC was submitted to the NRC in LAR 00-06, PG&E Letter DCL-00-094, "Alternate Repair Criteria for Axial PWSCC at Dented Intersections in Steam Generator Tubing," dated June 19, 2000. Revision 3 is incorporated into the Diablo Canyon Power Plant (DCPP) Technical Specifications (TS) by reference in proposed TS 5.5.9.d.1.f.3 in LAR 00-06. Revision 3 incorporates the clarifications and commitments made in a letter from Mr. Pedro Salas of Tennessee Valley Authority to the NRC dated March 2, 2000, "Sequoyah Nuclear Plant, Response to Request for Additional Information Regarding Topical Report WCAP-15128". A summary of changes from Revision 2 of the WCAPs to Revision 3 of the WCAPs is provided in Enclosure 1.

WCAP-15128, Revision 3, contains information proprietary to Westinghouse Electric Company LLC ("Westinghouse"). Accordingly, Enclosure 2 includes a Westinghouse Application for Withholding U.S. Proprietary Information from Public Disclosure, a Proprietary Information Notice, a Copyright Notice, and an accompanying Affidavit CAW-00-1406 signed by Westinghouse, the owner of the

APD 1

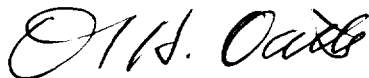
proprietary information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission, and it addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.790 of the Commission's regulations. PG&E requests that the Westinghouse proprietary information be withheld from public disclosure in accordance with 10 CFR 2.790.

In addition, WCAP-15128, Revision 3, contains information proprietary to PG&E. Accordingly, Enclosure 3 includes an affidavit signed by PG&E, the owner of the proprietary information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission, and it addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.790 of the Commission's regulations. PG&E requests that the PG&E proprietary information be withheld from public disclosure in accordance with 10 CFR 2.790.

Correspondence with respect to the copyright or proprietary aspects of the application for withholding related to the Westinghouse proprietary information or the Westinghouse affidavit provided in Enclosure 2 should reference Westinghouse Letter CAW-00-1406 and be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company LLC ("Westinghouse"), P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Correspondence with respect to the proprietary aspects of the application for withholding related to the PG&E proprietary information or the PG&E affidavit provided in Enclosure 3 should reference PG&E Letter DCL-00-100 and be addressed to David H. Oatley, Vice President - Diablo Canyon Operations and Plant Manager, Pacific Gas and Electric Company, Diablo Canyon Power Plant, P. O. Box 56, Avila Beach, California 93424.

Sincerely,



David H. Oatley

cc: Edgar Bailey, DHS w/o Enclosure 1
Steven D. Bloom (2) copies of Enclosure 1
Ellis W. Merschoff w/o Enclosure 1
David L. Proulx w/o Enclosure 1
Diablo Distribution w/o Enclosure 1 or 2

Enclosures

- **WCAP-15128, Revision 3 (Proprietary Class 2), "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections," June 2000**
- **WCAP-15129, Revision 3 (Non-Proprietary Class 3), "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections," June 2000**

WCAP-15128, Revision 3: Summary of Changes from Revision 2 to Revision 3		
Section	Page	Change Description
1.0	1-1	None
2.1.1	2-2	Current plant operating conditions renamed typical operating conditions
2.1.2	2-3	Added requirement to repair tubes if PWSCC indication at a cracked TSP ligament
2.1.3	2-3	Clarified that condition monitoring assessments are probabilistic calculations
2.1.3	2-4	Added requirements for updating growth distribution for operational assessments
2.1.6	2-5	Changed 90-day reporting requirement to 120-day
3.0		None
4.7.1	4-19	Added requirements for evaluating Sequoyah and Diablo Canyon growth distributions
5.4	5-8	Added to item 5 that depth profiles are adjusted by average depth growth
5.8	5-11	Corrected section reference from 4.3.7.1 to 4.6
Tables 5-1, 5-4, 5-5	5-15, 16, 18	Twelve additional laboratory specimen indications from Table 3-4 were added to burst pressure database and included in the burst correlation
6.2.2	6-7	Added paragraph on distribution of throughwall lengths in leak correlation database
6.3.3	6-11	Added paragraph identifying correlation parameters used for leak rate analyses
6.4.1	6-11	Added that maximum depth growth used in leak rate operational assessments
6.4.2	6-14	Added clarification that ligament tearing analyses include up to three sublengths of the total crack length
7.5.3 7.7	7-6 7-11	Added that operational assessment will include indications < 40% maximum depth
7.5.4	7-6	Changed source for constrained leak rate limit from Technical Specification to licensing basis for faulted SG
7.5.5	7-7	Added requirements for evaluating Sequoyah and Diablo Canyon growth distributions
7.5.5	7-7	Added requirements for updating growth distribution for operational assessments
7.6	7-10	Added requirement to repair tubes if PWSCC indication at a cracked TSP ligament
Figure 7-2	7-18	Added path to flow chart for indications < 40% depth requiring operational assessment
8.0		None
Appendices		None

- **Westinghouse Electric Company LLC (“Westinghouse”) Application for Withholding Proprietary Information from Public Disclosure (H. A. Sepp to Document Control Desk, Attention: Mr. Samuel J. Collins), CAW-00-1406, dated July 6, 2000**
- **Proprietary Information Notice**
- **Copyright Notice**
- **Affidavit CAW-00-1406 of H. A. Sepp, Manager, Regulatory and Licensing Engineering, Westinghouse Electric Company, dated July 6, 2000**