



**Pacific Gas and  
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PG&E Letter DCL-00-118

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  
Inservice Inspection Relief Request for Containment #CNT-E5, R1

Dear Commissioners and Staff:

Pursuant to 10 CFR 50.55a(g)(5)(iii), enclosed is Inservice Inspection Relief Request (RR) #CNT-E5, R1, regarding containment examination requirements. Based upon discussion with our NRC project manager on August 31, 2000, PG&E is providing clarification of additional measures to be taken to determine the nature and extent of any degradation that is detected during inspections. The changes are noted with revision bars.

PG&E requests that the NRC assign a medium priority and approve this RR concurrent with the previously submitted RRs prior to their potential need during containment structure examinations to be performed during the Unit 1 tenth refueling outage, which is currently scheduled to begin October 8, 2000.

Sincerely,

David H. Oatley

cc: Steven D. Bloom  
Ellis W. Merschoff  
David L. Proulx  
State of California  
Diablo Distribution

Enclosure

DDM/469/A0502111/A0506259

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## **INSERVICE INSPECTION (ISI) RELIEF REQUEST #CNT-E5, R1**

### System/Component for Which Relief is Requested

All visual examinations of painted or coated containment components prior to removal of paint or coatings.

### ASME Section XI Code Requirements for which Relief is Requested

Subarticle IWE-2500(b) of ASME Section XI, 1992 Edition, 1992 Addenda, requires that when paint or coatings are to be removed, the paint or coatings shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

### Code Requirement from Which Relief is Requested

Relief is requested from Subarticle IWE-2500(b), which requires that when paint or coatings are to be removed, the paint or coatings shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

### Basis for Relief Request

Paint and coatings are not part of the containment pressure boundary under current Code rules because they are not associated with the pressure-retaining function of the component. The interiors of containment are painted to prevent corrosion and to aid in contamination removal efforts. Paint and coatings on the containment pressure boundary were not subject to Code rules when they were originally applied and are not subject to ASME Section XI rules for repair or replacement in accordance with IWA-4111(b)(5). Deterioration of the paint or coating materials, e.g., flaking, scaling, etc., on containment would be an indicator of potential degradation of the containment pressure boundary. Additional measures such as VT-3 or VT-1 visual examination, ultrasonic measurement of remaining wall thickness, or evaluation by the responsible engineer would be employed to determine the nature and extent of any degradation, if present. The application of ASME Section XI rules for removal of paint or coatings, when unrelated to an ASME Section XI repair or replacement activity, does not provide a compensating increase in the level of quality and safety.

## **INSERVICE INSPECTION (ISI) RELIEF REQUEST #CNT-E5, R1**

### Proposed Alternative

The paint and coatings on the containment vessel will be examined in accordance with the Diablo Canyon Power Plant (DCPP) Qualified Coatings Program. If degradation of the coating is identified, additional measures such as VT-3 or VT-1 visual examination, ultrasonic measurement of remaining wall thickness, or evaluation by the responsible engineer will be applied to determine if the containment pressure boundary is affected. Although repairs to paint or coatings are not subject to the repair/replacement rules of ASME Section XI based on the Code's response to Inquiry 97-22, repairs to the primary containment boundary, if required, would be conducted in accordance with ASME Section XI Code rules.

### Justification for Granting of Relief

Coating inspection programs at DCPP currently restore the coating to its original condition thereby providing adequate assurance of the integrity of the coating. Therefore the proposed alternative provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a(a)(3)(i).

### Implementation Schedule

The alternative examination will be performed in Units 1 and 2, as conditions warrant, beginning with the first inspection interval for ASME Section XI Code, Subsection IWE-classified components that commenced prior to the end of the first inspection period (September 8, 2001).

This is a new request based on the NRC Final Rule (10 CFR 50.55a) issued on August 8, 1996.