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PG&E Letter DCL-01-080

**U.S. Nuclear Regulatory Commission
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**Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Review of WCAP-15573 for License Amendment Request 00-06, "Alternate Repair
Criteria for Axial PWSCC at Dented Intersections in Steam Generator Tubing"**

Dear Commissioners and Staff:

In PG&E Letter DCL-00-094, "License Amendment Request 00-06, 'Alternate Repair Criteria for Axial PWSCC at Dented Intersections in Steam Generator Tubing,'" dated June 19, 2000, PG&E submitted a request to amend Facility Operating License Nos. DPR-80 and DPR-82. License Amendment Request (LAR) 00-06 proposed Technical Specification changes to incorporate an alternate repair criteria (ARC) for axial primary water stress corrosion cracking (PWSCC) at dented tube support plate intersections. Based on subsequent discussions with the NRC, Supplement 1 to LAR 00-06 was submitted in PG&E Letter DCL-00-119, "Supplement to License Amendment Request 00-06, 'Alternate Repair Criteria for Axial PWSCC at Dented Intersections in Steam Generator Tubing,'" dated September 12, 2000, and Supplement 2 to LAR 00-06 was submitted in PG&E Letter DCL-01-016, "Supplement 2 to License Amendment Request 00-06, 'Alternate Repair Criteria for Axial PWSCC at Dented Intersections in Steam Generator Tubing,'" dated February 20, 2001. The technical analysis which supports the ARC for PWSCC is contained in WCAP-15573 (Proprietary) and WCAP-15574 (Nonproprietary), "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented Intersections – Alternate Burst Pressure Calculation," which were submitted in PG&E letter DCL-01-021, dated March 6, 2001.

During a June 28, 2001 meeting with the NRC on the scope and schedule for LAR 00-06, PG&E stated that the mixed mode indication methodology contained in WCAP-15573 and WCAP-15574 would be revised and a new submittal would be provided by September 1, 2001. However, based on a review of the time required to complete necessary testing and develop the technical bases and data to support a revised mixed mode indication methodology, and to respond to issues clarified

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by the NRC staff at the June 28, 2001 meeting, it is expected that the revised LAR and WCAP-15573 and WCAP-15574 will be submitted by October 19, 2001. In the mean time, in support of LAR 00-06, the NRC may review all sections of WCAP-15573 and WCAP-15574 with the exception of section 7.8.2, "Assessments of Mixed Mode Indications," and section 7.11, "NRC Reporting Requirements." New Sections 7.8.2 and 7.11 will be provided in the revised WCAP-15573 and WCAP-15574.

Sincerely,



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KJS