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PG&E Letter DCL-01-084

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

Response to NRC Request for Additional Information Regarding Risk-Informed Inservice Inspection Application for Diablo Canyon Power Plant Units 1 and 2

Dear Commissioners and Staff:

On July 28, 2001, the NRC staff identified additional information required in order to complete their evaluation of PG&E's relief request for application of an alternative to the ASME Boiler and Pressure Vessel Code Section XI examination requirements for Class 1 and 2 piping welds, dated February 16, 2001 (PG&E Letter DCL-01-015). During a telephone conference on August 15, 2001, the NRC staff requested that PG&E also respond to three additional questions. PG&E's response to both requests for information is included in Enclosure 1.

If there are any questions regarding this response, please contact Patrick Nugent at (805) 545-4720.

Sincerely,

Enclosure

cc: Edgar Bailey, DHS
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PG&E Response to NRC Requests for Additional Information Regarding Risk-Informed Inservice Inspection (RI-ISI) Application For Diablo Canyon Power Plant (DCPP) Units 1 and 2

Question 1

Page 4 of your submittal states that portions of the containment spray, chemical and volume control, safety injection, and residual heat removal systems contain Class 2 piping that is less than 0.375 inches thick. It also states that in response to an NRC request for additional information, the licensee for DCPP committed to performing volumetric examinations on a percentage of the welds in this "thin wall" piping during each ten year interval. It also states that this piping was included in the scope of the RI-ISI application and that this augmented inspection program is subsumed by the RI-ISI program. Please describe the mechanism/procedure by which this commitment to NRC will be changed.

PG&E Response to Question 1

Those portions of piping in the containment spray, chemical and volume control, safety injection and residual heat removal systems that are under 0.375 inches thick were included in the RI-ISI analysis and assigned appropriate risk categories. Therefore, the RI-ISI program supersedes the augmented inspection commitments made for this piping in response to the NRC request for additional information.

Upon approval of the DCPP RI-ISI program the augmented inspection commitments will be revised in accordance with the DCPP commitment change process to state that, in lieu of selecting a 7.5 percent sample of welds in those portions of piping in the containment spray, chemical and volume control, safety injection, and residual heat removal systems that are less than 0.375 inches thick, the selection of welds will be based on the Electric Power Research Institute (EPRI) RI-ISI methodology. The DCPP process for changing regulatory and other commitments is based on the Nuclear Energy Institute guidelines for managing NRC commitment changes.

Question 2

Page 5 of the submittal states that for DCPP, a deviation to EPRI RI-ISI methodology has been implemented in the failure potential assessment for thermal stratification, cycling and striping (TASCS). Please state if the revised methodology for assessing TASCS potential is in conformance with the updated criteria described in the EPRI letter to NRC dated March 28, 2001. Also, please confirm that as stated in the subject letter, once the final material reliability program guidance has been developed, the RI-ISI program will be updated for the evaluation of susceptibility to TASCS, as appropriate.

PG&E Response to Question 2

The methodology for assessing TASCS potential used in the DCPP RI-ISI submittal is identical to the methodology described in the EPRI letter to NRC dated March 28, 2001. PG&E will update the RI-ISI program based on the final EPRI material reliability program guidance as warranted.

Question 3

Page 4 [sic] of the submittal states that for DCPP Unit 1, 33.6 percent of the ASME XI examinations have been completed during the first period of the second interval and, therefore, 66.4 percent of the RI-ISI examinations will be performed during the third period so that 100 percent of the selected examinations are performed during the course of the interval. Specify which 66.4 percent of the RI-ISI examinations will be performed and what will be the basis of the selection. The same question applies to Unit 2, for which 32.7 percent of the ASME XI examinations have been completed and the remaining 67.3 percent examinations will be per RI-ISI.

PG&E Response to Question 3

For DCPP Unit 1, 33.6 percent of the existing ISI program examinations have been completed during the first period of the second interval, and 66.4 percent of the RI-ISI examinations will be performed during the second and third periods. Approximately the same percentages apply for DCPP Unit 2. The examination locations selected by RI-ISI were predicated on contribution to risk and partitioned to appropriately address the various risk categories. In both units, the more risk significant welds will be selected for examination within the remaining two periods of this Interval.

Question 4

Will the RI-ISI program be updated every 10 years and submitted to the NRC consistent with the current ASME XI requirements?

PG&E Response to Question 4

The ISI program will be updated and submitted to the NRC consistent with regulatory requirements in effect at the time such update is required (currently every 10 years). This may again take the form of a relief request to implement an updated RI-ISI program depending on future regulatory requirements.

Question 5

Under what conditions will the RI-ISI program be resubmitted to the NRC before the end of any 10-year interval?

PG&E Response to Question 5

The RI-ISI program will be resubmitted to the NRC prior to the end of any 10-year interval if there is some deviation from the RI-ISI methodology described in the initial submittal or if industry experience determines that there is a need for significant revision to the program as described in the original submittal for that interval. PG&E has already initiated tracking documents to ensure that the RI-ISI program is monitored and periodically reviewed for risk ranking in accordance with the commitments made in Section 4 of the submittal. Revisions made as a result of these reviews will be considered for submittal as outlined above.

Question 6

Page 9 of your submittal presents the criteria for engineering evaluation and additional examinations if unacceptable flaws or relevant conditions are found during examinations. The submittal states that the evaluation will include whether other elements in the segment or segments are subject to the same root cause conditions. The submittal further states that additional examinations will be performed on these elements up to a number equivalent to the number of elements required to be inspected on the segment or segments initially. Please address the following:

1 *Please clarify the term "initially". Specifically, does it refer to inspections planned for the current outage or the current interval?*
2 *Please clarify how will the elements be selected for additional examinations. Specifically, please verify that the elements will be selected based on the root cause or damage mechanism and include high risk significant as well as medium risk significant elements (if needed) to reach the required number of additional elements.*

PG&E Response to Question 6

In this application, the term "initially" refers to those examinations originally scheduled for the current refueling outage.

Elements selected for additional examinations will be selected based on the root cause or damage mechanism and will include high risk significant as well as medium risk significant elements (if needed) to reach the required number of additional elements.