



**Pacific Gas and
Electric Company**

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PG&E Letter DCL-02-014

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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Supplemental Information Regarding Implementation ASME Code Case N-597

Dear Commissioners and Staff:

As discussed with the NRC Staff in a teleconference on December 20, 2001, PG&E is providing supplemental information regarding DCL-01-028, "Inservice Inspection Relief Request - Use of ASME Code Case N-597," dated March 28, 2001.

PG&E will implement the American Society of Mechanical Engineers (ASME) Code Case N-597, "Requirements for Analytical Evaluation of Pipe Wall Thinning, Section XI, Division 1," in Departmental Level Administrative Procedure TS1.NE1, "Erosion/Corrosion Monitoring Program," with the use of the terms "shall" and "should" defined in Inter-Departmental Administrative Procedure AD2.ID1, "Procedure Use and Adherence," Section 4.1:

The word "shall" denotes a requirement, regardless of whether the requirement is the result of a commitment, a higher level document, or a management directive.

The word "should" denotes a management expectation which shall be implemented unless justified by particular circumstances. In these cases, supervisors may authorize alternate actions satisfying the intent of the expectation. In rare cases, supervisors may determine that not implementing the expectation is the best alternative.

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PG&E understands that except for the above supplemental information no further questions remain regarding this Relief Request, and it can be approved prior to the potential need during piping examinations to be performed during the Unit 1 eleventh refueling outage, currently scheduled to begin April 28, 2002.

Sincerely,

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DDM/469/A0528299

cc: Ellis W. Merschoff
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