



**Pacific Gas and
Electric Company**

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March 14, 2002

PG&E Letter DCL-02-027

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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 License
Amendment Request 01-03, "Expansion of Steam Generator Tube W* Alternate
Repair Criteria for Indications in the Westinghouse Explosive Tube Expansion
(WEXTEX) Region"

Dear Commissioners and Staff:

On March 1, 2002, the NRC staff identified additional information required in order to complete its evaluation associated with License Amendment Request (LAR) 01-03. LAR 01-03 proposes Technical Specification changes to allow extension of steam generator tube W star (W*) alternate repair criteria through cycles 12 and 13. LAR 01-03 was submitted to the NRC in PG&E Letter DCL-01-095, "License Amendment Request 01-03, Extension of Steam Generator Tube W* Alternate Repair Criteria for Indications in the Westinghouse Explosive Tube Expansion (WEXTEX) Region," dated September 13, 2001. The NRC staff questions were clarified during a telephone call between PG&E and the NRC staff on March 5, 2002. PG&E's response to the request for additional information is included in Enclosure 1.

This additional information does not affect the results of the safety evaluation and no significant hazards determination previously transmitted in PG&E Letter DCL-01-095.

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

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Sincerely,



A handwritten signature in black ink, appearing to read 'Greg Rueger', written over the printed name.

Gregory M. Rueger
Senior Vice President - Generation and Chief Nuclear Officer

kjs/4328
Enclosure

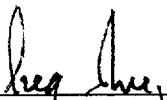
cc: Diablo Distribution
cc/enc: Edgar Bailey, DHS
Girija S. Shukla
Ellis W. Merschoff
David L. Proulx

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

)	Docket No. 50-275
In the Matter of)	Facility Operating License
PACIFIC GAS AND ELECTRIC COMPANY)	No. DPR-80
Diablo Canyon Power Plant)	Docket No. 50-323
Units 1 and 2)	Facility Operating License
)	No. DPR-82

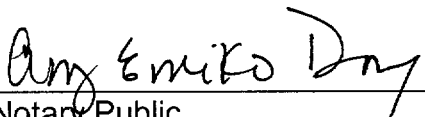
AFFIDAVIT

Gregory M. Rueger, of lawful age, first being duly sworn upon oath says that he is Senior Vice President - Generation and Chief Nuclear Officer of Pacific Gas and Electric Company; that he has executed this response to the request for additional information on License Amendment Request 01-03 on behalf of said company with full power and authority to do so; that he is familiar with the content thereof; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.



 Gregory M. Rueger
 Senior Vice President – Generation and Chief Nuclear Officer

Subscribed and sworn to before me this 14th day of March 2002.
County of San Francisco
State of California



 Notary Public



PG&E Response to NRC Request for Additional Information Regarding License Amendment Request 01-03, Extension of Steam Generator Tube W* Alternate Repair Criteria for Indications in the Westinghouse Explosive Tube Expansion (WEXTEX) Region

Question 1

The six (6) in-situ test results which did not meet the in-situ screening criteria (Page 4, Table 1, of DCL-01-095) should not be used to validate the leak rate model.

PG&E Response to Question 1

The six in-situ tests that did not exceed the in-situ screening threshold values (identified in Table 1 of PG&E letter DCL-01-095, "License Amendment Request 01-03, Extension of Steam Generator Tube W* Alternate Repair Criteria for Indications in the Westinghouse Explosive Tube Expansion (WEXTEX) Region," dated September 13, 2001) will not be included as indications used to validate the W star (W*) leakage model. Therefore, an additional 14 indications are required to be tested in order to satisfy the commitment that 20 indications, summed over all plants with WEXTEX expansions, are tested. A revised Table 1, with these six in-situ tests removed, is provided below.

Table 1
Industry In-situ Test Results for Axial PWSCC in WEXTEX Region

Plant	Year	SG	Tube	Deplug Tube	Crack Distance Below BWT, (below TTS for SQN and BVPS), (Inch)	Peak Volt (Volt)	Crack Length (Inch)	Max Depth (%)	Approx Length > 80%, (Inch)	In-situ Test Required due to Exceeding Threshold Values	Test Pressure	Leak Rate
DCPP 2	1999	1	R3C59	Yes	0.51	5.6	0.27	100%	0.23	Yes	ΔP_{NO}	0
DCPP 2	1999	1	R7C62	Yes	0.59	4.2	0.35	80%	None	Yes	ΔP_{NO}	0
DCPP 2	1999	2	R31C25	Yes	0.98	4.0	0.24	70%	None	Yes	ΔP_{NO}	0
DCPP 2	2001	3	R7C52	Yes	0.56	3.4	0.43	94%	0.37	Yes	ΔP_{NO}	0
DCPP 2	2001	4	R2C29	Yes	3.52	4.5	0.91	100%	0.84	Yes	ΔP_{NO}	0
SQN 2	1997	4	R7C17	No	0.15	3.6	0.32	100%	0.02	Yes	$3\Delta P_{NO}$	0

Question 2

DCL-01-095 states that "if no leaking W indications are obtained after 20 in-situ tests (summed over all plants with WEXTEX expansions), in-situ testing would be terminated for W* indications and PG&E will request a permanent ARC." This commitment is not consistent with the original commitment in DCL-98-148.*

PG&E Response to Question 2

PG&E will meet the original commitment in letter DCL-98-148, "Response to NRC Request for Additional Information, Dated August 6, 1998, Regarding Proposed W* Steam Generator Tube Repair Criteria," dated October 22, 1998, which stated:

"W* indications that exceed the nondestructive examination (NDE) threshold values for in-situ testing will be leak tested to support the W* leakage model. In-situ testing would be continued until approximately 20 W* indications, summed over all plants with Westinghouse explosive tube expansion (WEXTEx) expansions, are tested. If a sufficient number of leaking W* indications are obtained to support the leakage model (i.e., the total leakage summed over all leaking indications is bounded by the calculated leakage for the leaking indications), in-situ testing would be terminated for W* indications. If a sufficient number of leaking W* indications are not obtained after approximately 20 in-situ leak tests, Diablo Canyon Power Plant would initiate discussions with the NRC staff on whether to continue in-situ testing."

Question 3

In-situ testing screening criteria in Step 1 has no reference to W indications that have never been tested. How are those treated?*

PG&E Response to Question 3

For the application of the in-situ testing screening criteria contained in DCL-01-095, for W* indications that have never been tested, the indications will be carried to Step 2.