



**Pacific Gas and  
Electric Company**

October 14, 2004

PG&E Letter DCL-04-124

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

Withdrawal of License Amendment Request 03-15, "Steam Generator Tube Repair  
Using Leak Limiting Alloy 800 Sleeves and Revision to Technical Specification  
Table 5.5.9-2, 'Steam Generator (SG) Tube Inspection'"

Dear Commissioners and Staff:

PG&E Letter DCL-03-132, dated October 22, 2003, submitted License Amendment Request (LAR) 03-15, "Steam Generator Tube Repair Using Leak Limiting Alloy 800 Sleeves and Revision to Technical Specification Table 5.5.9-2, 'Steam Generator (SG) Tube Inspection.'" LAR 03-15 proposes to change Technical Specification (TS) Section 5.5.9, "Steam Generator (SG) Tube Surveillance Program," and TS Section 5.6.10, "Steam Generator (SG) Tube Inspection Report," to allow use of leak limiting Alloy 800 sleeves to repair degraded SG tubes as an alternative to plugging the SG tubes. The LAR also proposes to remove an unnecessary reporting requirement contained in TS Table 5.5.9-2, "Steam Generator (SG) Tube Inspection." PG&E Letter DCL-03-132 contained Westinghouse Electric LLC (Westinghouse) WCAP-15919-NP, Revision 00, "Steam Generator Tube Repair for Westinghouse Designed Plants with 7/8 Inch Inconel 600 Tubes Using Leak Limiting Alloy 800 Sleeves," dated August 2003 (nonproprietary), and WCAP-15919-P, Revision 00, "Steam Generator Tube Repair for Westinghouse Designed Plants with 7/8 Inch Inconel 600 Tubes Using Leak Limiting Alloy 800 Sleeves," dated August 2003 (proprietary), which document the use of Leak Limiting Alloy 800 Sleeves to repair degraded SG tubes.

PG&E Letter DCL-04-070, "Response to NRC Request for Additional Information Regarding License Amendment Request 03-15, 'Steam Generator Tube Repair Using Leak Limiting Alloy 800 Sleeves and Revision to Technical Specification Table 5.5.9-2, 'Steam Generator (SG) Tube Inspection,'" dated June 4, 2004, responded to the staff's questions dated March 8 and May 14, 2004.

PG&E Letter DCL-04-079, "Transmittal of WCAP-15919-P, 'Steam Generator Tube Repair for Westinghouse Designed Plants with 7/8 Inch Inconel 600 Tubes Using Leak Limiting Alloy 800 Sleeves,' Revision 01, to Support License Amendment

**David H. Oatley**  
Vice President and  
General Manager

Diablo Canyon Power Plant  
P.O. Box 56  
Avila Beach, CA 93424

805.545.4350  
Fax: 805.545.4234

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Request 03-15, 'Steam Generator Tube Repair Using Leak Limiting Alloy 800 Sleeves and Revision to Technical Specification Table 5.5.9-2, "Steam Generator (SG) Tube Inspection,"' dated June 25, 2004, submitted revised WCAP-15919-NP, Revision 01, and revised WCAP-15919-P, Revision 01.

On June 24 and August 9, the NRC staff provided additional questions related to the redefinition of the pressure boundary transition in the rolled joint region of the tubesheet (TZ) sleeve, the effectiveness of the eddy current inspection method for detecting cracks in the parent tube behind the nickel band in TZ sleeve, and the ability of the rolled joint above the bottom of the microlok band to provide structural and leakage integrity. The effort involved to resolve these technical issues is not expected to be completed until February of 2005. In addition, a revision to WCAP-15919-NP, Revision 01, WCAP-15919-P, Revision 01, and the TS associated with leak limiting alloy 800 sleeves is expected to be required. Therefore, PG&E is requesting withdrawal of LAR 03-15 and closure of the associated TAC numbers. PG&E plans to resubmit proposed TS changes for SG tube repair using leak limiting alloy 800 sleeves upon resolution of the current technical issues.

If you have any questions, or require additional information, please contact Stan Ketelsen at (805) 545-4720.

Sincerely,

David H. Oatley  
*Vice President and General Manager*

kjse/extension 4328

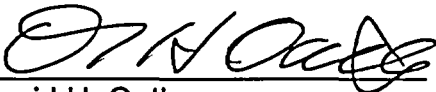
cc: Edgar Bailey, DHS  
Bruce S. Mallett  
David L. Proulx  
Girija S. Shukla  
Diablo Distribution

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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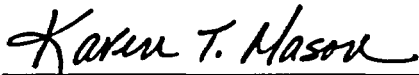
AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath says that he is Vice President and General Manager – Diablo Canyon of Pacific Gas and Electric Company; that he has executed this withdrawal of LAR 03-15 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.



David H. Oatley  
*Vice President and General Manager*

Subscribed and sworn to before me this 14<sup>th</sup> day of October 2004.



Notary Public  
County of San Luis Obispo  
State of California

