



**Pacific Gas and  
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PG&E Letter DCL-08-047

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U.S. Nuclear Regulatory Commission  
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Docket No. 50-323, OL-DPR-82  
Diablo Canyon Unit 2  
60-Day Response to Revision 1 of NRC Order EA-03-009, "Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors"

Dear Commissioners and Staff:

On February 11, 2003, the NRC issued Order EA-03-009 for interim inspection requirements for reactor pressure vessel heads at pressurized water reactor facilities. On February 20, 2004, the NRC issued the First Revised Order EA-03-009, which superseded Order EA-03-009. Revision 1 of the Order modified the requirements regarding nondestructive examination of the penetration nozzles and requires that, within 60 days after returning a unit to operation, licensees provide a description of the inspections performed in accordance with the Order and describe any leaks or boron deposits found during the inspection.

During the Diablo Canyon Power Plant (DCPP) Unit 2 Fourteenth Refueling Outage (2R14), completed on April 12, 2008, Pacific Gas and Electric Company (PG&E) performed a bare metal visual inspection of 100 percent of the reactor pressure vessel (RPV) head penetrations, including 360 degrees around each of the vessel head penetration nozzles and the head vent penetration. Visual inspection of greater than 95 percent of the RPV head surface was also performed to identify any degradation. No evidence of vessel head penetration nozzle leakage or cracking, or degradation of the RPV head was identified. PG&E also performed nonvisual nondestructive volumetric examination on all 79 reactor head penetration tubes, including the head vent penetration. The examination detected no discontinuities or indications of boric acid leak paths, and no flaws needing disposition or corrective action were identified. In addition, PG&E performed a visual inspection to identify potential boric acid leaks from the pressure-retaining components above the RPV head. Minor localized dry boric acid deposits on small valve packing glands were identified and corrected. The enclosure contains the 60-day response for DCPP Unit 2 (2R14) required by the first revision of NRC Order EA-03-009.

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

Sincerely,

James R. Becker  
*Site Vice President and Station Director*

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Enclosure

cc: Diablo Distribution  
cc/enc: Gary Butner, California Department of Public Health  
Elmo E. Collins, Regional Administrator, NRC Region IV  
Michael S. Peck, NRC Senior Resident Inspector  
Alan B. Wang, Project Manager NRR

**60-Day Response to NRC Order EA-03-009, "Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors"**

NRC Required Information:

*The first revision of NRC Order EA-03-009, dated February 20, 2004, required that, for each inspection required in Paragraph C of the Order, the Licensee shall submit a report detailing the inspection results within 60 days after returning the plant to operation. For each inspection required in Paragraph D of the Order, the Licensee shall submit a report detailing the inspection results within 60 days after returning the plant to operation if a leak or boron deposit was found during the inspection.*

Pacific Gas and Electric Company (PG&E) Response:

Diablo Canyon Power Plant (DCPP) Unit 2 has accumulated approximately 13.25 total effective degradation years prior to the Unit 2 Fourteenth Refueling Outage (2R14). Therefore, PG&E was required to perform an inspection in accordance with NRC Order EA-03-009, Sections IV.C.(5) and IV.D.

During 2R14, which was completed on April 12, 2008, PG&E complied with Section IV.C.(5)(a) of Revision 1 of the Order by performing a bare metal visual examination of the reactor pressure vessel (RPV) head penetrations, including 360 degrees around each of the vessel head penetration nozzles and the head vent penetration. The bare metal visual inspection to identify degradation covered greater than 95 percent of the RPV head surface. The only area not covered by the bare metal visual inspection was that area inaccessible due to support structure interference. However, the inspection included those areas of the RPV head upslope and downslope from the support structure interference. No evidence of boron or corrosive product was found, and no evidence of vessel head penetration nozzle leakage or cracking, or degradation of the RPV head was identified.

During 2R14, PG&E also complied with Section IV.C.(5)(b)(i) of Revision 1 of the Order by performing a nonvisual nondestructive volumetric examination on all 79 reactor head penetration tubes (RHPT), including the head vent penetration. A combination of ultrasonic and eddy current testing methods was used with probes delivered to the tubes by a remote positioning device (or manually in the case of the head vent tube). The inspection encountered limitations to the Order's specified examination areas in some of the RHPTs due to the large as-built configuration of the J-welds, the chamfer at the end of the tubes, and the geometry of the transducers on the examination probes. The inspection coverage above the J-groove satisfies the order requirements for all

penetrations. The inspection coverage below the J-groove weld on the downhill side of the penetrations was achieved for all locations examined using the open housing tool, and some of the penetrations examined with the gap scanner tool. In all cases, the examination coverage exceeded the 0.3 inch minimum criteria established by NRC approval for relaxation from the requirements of Section IV.C.(5)(b) of Revision 1 of the Order for DCP Unit 2, as stated in the April 21, 2006, NRC Letter to PG&E, "Diablo Canyon Power Plant, Unit No. 2 – Relaxation of Requirements Associated with First Revised Order (EA-03-009) dated February 20, 2004, Regarding Alternate Examination Coverage for Reactor Pressure Vessel Head Penetration Nozzles (TAC No.MD0024)." The examinations detected no discontinuities or indications of boric acid leak paths, no flaws needing disposition, and no corrective actions were identified.

Finally, during 2R14, PG&E complied with Section IV.D of Revision 1 of the Order by performing a visual inspection to identify potential boric acid leaks from pressure-retaining components above the RPV head. Minor dry boric acid accumulations were identified on two control rod drive mechanism stack vent valves located above the head; in no case did this dry boric acid ring extend beyond the immediate area of the valve seal. Maintenance was performed on both vent valves during the outage to remedy the cause of leakage.