

### UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 22, 2010

LICENSEE: Pacific Gas and Electric Company

FACILITY: Diablo Canyon Nuclear Power Plant, Units 1 and 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JULY 1, 2010,

BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND PACIFIC GAS AND ELECTRIC COMPANY CONCERNING DRAFT REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION—AGING

MANAGEMENT PROGRAMS

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Pacific Gas and Electric Company (PG&E) held a telephone conference call on July 1, 2010, to obtain clarification on the staff's draft request for additional information (D-RAI) regarding the Diablo Canyon Nuclear Power Plant license renewal application (LRA).

By email dated June 11, 2010, the staff sent D-RAIs to PG&E regarding aging management programs. PG&E reviewed the information contained therein, and requested a telephone conference call. The telephone conference call was useful in clarifying the intent of the staff's D-RAIs. Enclosure 2 provides discussions on D-RAI for which the applicant requested clarification. No changes to other D-RAIs were necessary as a result of this telephone conference call. Formal RAIs will be issued by a separate letter.

Enclosure 1 provides a listing of the participants.

The applicant had an opportunity to comment on this summary.

Nathaniel Ferrer, Safety Project Manager

Projects Branch 2

Division of License Renewal

Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosures: As stated

cc w/encl: See next page

## TELEPHONE CONFERENCE CALL DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 LICENSE RENEWAL APPLICATION

#### LIST OF PARTICIPANTS JULY 1, 2010

PARTICIPANTS AFFILIATIONS

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William Holston NRC
Seung Min NRC
Albert Wong NRC

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Chalmer Myer Strategic Teaming And Resource Sharing (STARS)

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# Diablo Canyon Nuclear Power Plant, Units 1 and 2 License Renewal Application Draft Request for Additional Information Aging Management Programs/Aging Management Review

#### **D-RAI B2.1.20-1**

LRA Table 3.4.2-1 and 3.4.2-3 included carbon steel valves exposed to atmosphere/weather (external) and managed by the AMP B2.1.20, "External Surfaces Monitoring." The GALL AMP XI.M36, "External Surfaces Monitoring," recommends visual inspection of external surfaces for evidence of material loss and leakage.

During an examination of Diablo Canyon Power Plant (DCPP) plant documentation for External Surfaces Monitoring Program, there were instances of in-scope carbon steel valves within LRA Table 3.4.2-1 and 3.4.2-3 (identification numbers MU-0237, MU-0238, MU-0273, MU-0883 and MU-0884) that were buried and therefore not accessible for the visual inspection methods recommended in GALL AMP XI.M36, "External Surfaces Monitoring." The DCPP LRA states that the External Surfaces Monitoring Program relies on visual inspection to detect degradation by aging. It is unclear to the staff that the in-scope buried valves can be monitored by visual inspection. In addition, it is not clear to the staff that buried valves are properly managed by AMP B2.1.20, "External Surfaces Monitoring" because they are exposed to soil environments and not external air.

Provide clarification regarding the correct categorization of the environments to which the inscope valves are subjected to (external air or soil environments). Provide information confirming that the AMP B2.1.20 "External Surfaces Monitoring," with the requirement for visual inspection, is appropriate to manage aging of these inaccessible buried in-scope components.

<u>Discussion</u>: Based on the discussion with the applicant, it was determined that the valves in question were from a different LRA table and were not composed of carbon steel. Additionally two of the 5 valves in question had different identification numbers. The staff will revise this question as follows. The revised question will be sent as a formal RAI.

#### **RAI B2.1.20-1**

LRA Table 3.3.2-5 included valves exposed to atmosphere/weather (external) and managed by the AMP B2.1.20, "External Surfaces Monitoring." The GALL AMP XI.M36, "External Surfaces Monitoring" recommends visual inspection of external surfaces for evidence of material loss and leakage.

During an examination of DCPP plant documentation for External Surfaces Monitoring Program, there were instances of in-scope valves within LRA Table 3.3.2-5 (identification numbers MU-0-267, MU-0-268, MU-0-273, MU-0-883 and MU-0-884 within the make water system) that were buried and therefore not accessible for the

visual inspection methods recommended in GALL AMP XI.M36, "External Surfaces Monitoring." The DCPP LRA states that the External Surfaces Monitoring Program relies on visual inspection to detect degradation by aging. It is unclear to staff that the in-scope buried valves can be monitored by visual inspection. In addition, it is not clear to the staff that buried valves are properly managed by AMP B2.1.20, "External Surfaces Monitoring" because they are exposed to soil environments and not external air.

Provide clarification regarding the correct categorization of the environments to which the in-scope valves are subjected to (external air or soil environments). Provide information confirming that the AMP B2.1.20, "External Surfaces Monitoring," with the requirement for visual inspection, is appropriate to manage aging of these inaccessible buried in-scope components.

#### Memorandum to Pacific Gas and Electric Company from N. Ferrer dated July 22, 2010

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SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JULY 1, 2010, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND PACIFIC GAS AND ELECTRIC COMPANY CONCERNING DRAFT REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION—GING

MANAGEMENT PROGRAMS

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/RA/

Nathaniel Ferrer, Safety Project Manager Projects Branch 2 Division of License Renewal Office of Nuclear Reactor Regulation

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