



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 17, 2010

Mr. John Conway
Senior Vice President
Generation and Chief Nuclear Officer
Pacific Gas and Electric Company
77 Beale Street, MC B32
San Francisco, CA 94105

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE REVIEW OF
THE DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2, LICENSE
RENEWAL APPLICATION (TAC NOS. ME2896 AND ME2897) – AGING
MANAGEMENT PROGRAMS

Dear Mr. Conway:

By letter dated November 23, 2009, Pacific Gas & Electric Company submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses for Diablo Canyon Nuclear Power Plant, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

The request for additional information was discussed with Mr. Terry Grebel, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-1045 or by e-mail at nathaniel.ferrer@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Ferrer", is positioned above the typed name.

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

Docket Nos. 50-275 and 50-323

Enclosure:
As stated

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Diablo Canyon Nuclear Power Plant, Units 1 and 2
License Renewal Application
Request for Additional Information Set 24
Aging Management Programs

RAI B2.1.20-2

Background

GALL AMP XI.M36, "External Surfaces Monitoring Program" states, "[s]urfaces that are inaccessible or not readily visible during plant operations are inspected during refueling outages. Surfaces that are inaccessible or not readily visible during both plant operations and refueling outages are inspected at such intervals that would provide reasonable assurance that the effects of aging will be managed such that applicable components will perform their intended function during the period of extended operation."

The Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (SRP-LR) Section 3.2.2.4 states, "[t]he summary description of the programs and activities for managing the effects of aging for the period of extended operation in the Final Safety Analysis Report (FSAR) Supplement should be sufficiently comprehensive such that later changes can be controlled by 10 CFR 50.59." It also states that, "[e]xamples of the type of information required are provided in Table 3.2-2 of this SRP-LR." SRP-LR Section 3.2.3.4 states, "[t]he reviewer confirms that the applicant has provided information equivalent to that in Table 3.2-2 in the FSAR Supplement for aging management of the auxiliary systems for license renewal." The description of program for the "External Surfaces Monitoring Program" in Tables 3.2-2, 3.3-2 and 3.4-2 includes the following, "[s]urfaces that are inaccessible during plant operations are inspected during refueling outages. Surfaces that are inaccessible during both plant operations and refueling outages are inspected at frequencies to provide reasonable assurance that effect of aging will be managed such that applicable components will perform their intended function during the period of extended operation."

Issue

LRA Section B2.1.20 states, "[e]xternal surface inspections will be performed on passive components in scope for license renewal at intervals no longer than once per refueling cycle ..." LRA Section B2.1.20 also states, "[t]he External Surfaces Monitoring Program will provide clarification for areas, or portions of systems or components, that may be exempted from walkdown inspections based on physical or environmental constraints."

It is not clear to the staff if the applicant has access to all surfaces being age managed by the External Surfaces Monitoring Program during plant operations and refueling outages as is implied in the first quoted statement, but given the second quoted statement, it does appear that the applicant has a process for excluding some external surfaces from walkdowns based on physical or environmental constraints. The License Renewal Application (LRA) does not contain a statement that the applicant will ensure that those components that are "exempted from walkdowns," will be ultimately inspected or evaluated to ensure the components will perform their intended functions during the period of extended operation if an inspection cannot be performed. The staff requires further information to understand how the applicant will evaluate

ENCLOSURE

components that are “exempted from walkdowns”, thus implying that they will never be inspected.

LRA Section A1.20, the FSAR Supplement description for the External Surfaces Monitoring Program does not contain information related to inaccessible surfaces during plant operations and inaccessible surfaces during plant operations and refueling outages.

Request

1. Describe the criteria that will be used and evaluation methodology to ensure that components “exempted from walkdown” will be managed such that applicable components will perform their intended function during the period of extended operation.
2. Revise FSAR Supplement Section A1.20 to ensure that surfaces that are inaccessible during both plant operations and refueling outages are inspected at frequencies to provide reasonable assurance that effect of aging will be managed such that applicable components will perform their intended function during the period of extended operation, or provide justification that a revision is not needed.

RAI B2.1.20-3

LRA Table 3.3.2-7, “Auxiliary Systems – Compressed Air” contains line items for copper alloy (>15 percent zinc) regulators and solenoid valves exposed to atmospheric weather being managed for loss of material by the External Surfaces Monitoring Program. LRA Section B2.1.20, External Surfaces Monitoring AMP, does not include copper alloy (>15 percent zinc) in the Program Description or “scope of program” exemption.

Given that the External Surfaces Monitoring Program does not include copper alloy (>15 percent zinc) material in LRA Section B2.1.20, the staff cannot conclude that associated AMR line items will be appropriately age managed.

Request:

1. Revise LRA Section B2.1.20 to include copper alloy (>15 percent zinc) or state an alternative aging management program for the above line items.
2. State whether the associated program basis documents include copper alloy (>15 percent zinc) material.

September 17, 2010

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Sincerely,

/RA/

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

Docket Nos. 50-275 and 50-323

Enclosure:
As stated

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Letter to John Conway from Nathaniel Ferrer dated September 17, 2010

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