

DiabloCanyonNPEm Resource

From: Sizemore, Brandy [BNSM@pge.com]
Sent: Tuesday, January 25, 2011 3:19 PM
To: Pick, Greg
Cc: Grebel, Terence; Tan, Miranda; Sharp, Loren
Subject: Draft Implementation Plan
Attachments: DCPP License Renewal Implementation Project Plan 010410.doc

Hello,

Attached is the most updated copy of the draft implementation plan. The master notification tracking the plan is 50371663.

Thanks
Brandy Sizemore
DCPP License Renewal Engineer
Phone: (805) 781-9417

<<DCPP License Renewal Implementation Project Plan 010410.doc>>

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Created By: BNSM@pge.com

Recipients:

"Grebel, Terence" <TLG1@pge.com>
Tracking Status: None
"Tan, Miranda" <M1TF@pge.com>
Tracking Status: None
"Sharp, Loren" <LDSL@PGE.COM>
Tracking Status: None
"Pick, Greg" <Greg.Pick@nrc.gov>
Tracking Status: None

Post Office: exchange18.Utility.pge.com

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Diablo Canyon Power Plant



Draft Project Plan for License Renewal Implementation

Approval: _____

_____ Date

Background

On November 23, 2009 Pacific Gas and Electric (PG&E) submitted a License Renewal Application (LRA) for Diablo Canyon Power Plant (DCPP). The License Renewal Implementation (LRI) phase refers to the phase prior to the issuance of the renewed license and into the period of extended operation (PEO).

The purpose of this document is to identify activities that are to take place, pursuant to the requirements of 10 CFR 54, *Requirements for Renewal of Operating Licenses for Nuclear Power Plants*, upon receipt of a renewed license for DCPP

To facilitate knowledge transfer DCPP management has requested that the License Renewal Project staff and plant staff prepare an implementation plan with a target date of December 2011 to the extent possible. This includes preparing and implementing all required procedure and procedure revisions necessary to implement license renewal. Some of these procedures may be issued with an effective date being the period of extended operation. Management directed that this target goal be implemented such that it does not adversely impact other required plant 2011 activities. The license renewal staff will work with the plant staff to finalize the individual aging management program implementation plans and to determine to what extent the license renewal implementation can be accomplished in 2011. The target schedule for finalizing the implementation plan is March 2011.

Overview of Work Activities

The actions associated with LRI will fall into 4 categories:

1. Revise the 10 Element AMPs to reflect the RAIs – May 2011
2. Update PCD to reflect the LRA and RAIs for existing procedures – May 2011
3. Determine the equipment database revisions required to implement LR – April 2011. This includes developing a schedule for completing equipment database modifications.
4. Perform annual updates in accordance with 10 CFR 54.21(b). February 2011 (If required by NRC PM)
5. Perform annual updates in accordance with 10 CFR 54.37(b). December 2011
6. Update equipment database modifications and issue work orders for LR required activities - December 2011
7. Develop AMP Program Administrative Procedure to determine requirements for each AMP (effectiveness, OE, maintenance of LR Licensing Basis, implementation, hardcopy notebooks and electronic etc.) – December 2011
8. Perform STARS Peer Assessment of DCPP LR Implementation -October 2011

9. Perform DCPD QA assessment of DCPD LR Implementation -January 2012
10. Revise procedures/10 Element AMPs to reflect the Final SER – December 2011
11. Implement all new/enhanced programs whose implementation is not tied to the PEO-December 2011. See attachment 1 for specific AMPs.
12. Implement new programs tied to the PEO with an effective date of the PEO – See attachment 1 for AMPs.
13. Issue License Renewal Design Basis Package – December 2011
14. Determine if revisions are required to design modification procedures – December 2011
15. Develop PEO entry schedule including performance of assessments – December 2011
16. Develop a plan to prepare for NRC inspections associated with entering the PEO. - 2012

A DCM will be developed in order to define the actions, schedule, and personnel responsibilities necessary for LRI.

Development and Performance of Aging Management Programs

Aging management programs (AMP), which were developed to meet the requirements of NUREG 1801, must be developed and performed. Aging management activities are to be performed as described in the LRA. AMP activities that are currently performed by the plant will be maintained by utilizing the PCD.

Integration of AMP Activities and Commitment Tracking

Commitments were made in the LRA to create new AMPs and modify existing AMPs. These commitments are by a SAP notification. A schedule will be created to determine the appropriate time to complete each AMP activity. AMP activities include developing and implementing new procedures and performing inspections. Work orders will be used to track inspections and inspection activities.

Attachment 1 shows AMPs and their corresponding implementation action. A schedule for completing each task in Attachment 1 will be created.

Annual Updates in Accordance with 10 CFR 54.37(b)

10 CFR 54.37(b) states:

After the renewed license is issued, the UFSAR update required by 10 CFR 50.71(e) must include any systems, structures, and components newly identified that would have been subject to an aging management review or evaluation of time-limited aging analyses in accordance with § 54.21. This UFSAR update must describe how the effects of aging will be managed such that the intended function(s) in § 54.4(b) will be effectively maintained during the period of extended operation.

COMPLETE the License Renewal UFSAR Update describing how the effects of aging on intended function(s) will be managed during the period of extended operation. The update must include the following:

1. Name and description of the newly identified systems, structures, and components. For systems, the boundary of the system must be described and a list of passive, long-lived components provided.
2. Material of construction
3. Internal and external environments
4. Aging effects for the material/environment combinations
5. Search for any aging-related analyses related to the newly identified SSC and screen against the six TLAA criteria. (Refer to the definition of a TLAA)
6. Aging Management Program(s) (AMPs) that will be used to manage the effects of aging.
 - a. For existing AMPs, the name of the AMP is adequate.
 - b. If a new AMP is needed, then a description of the AMP that demonstrates how the effects of aging will be managed must be included.
 - c. Determine if revision to implementing documents is required or if new implementing documents need to be developed.
 - d. Update commitment tracking items as necessary

CF3.ID9, *Design Change Development*, will need to be revised to ensure that changes to the plant remain in compliance with license renewal.

Preparation for NRC Inspection Activities

The NRC will conduct post-renewal inspections in accordance with IP 71003. Current industry feedback indicates that there are 3 inspections associated with implementation. The first consists of observations of LR related activities, such as one-time inspections, and will be conducted during one of the last 4 refueling outages prior to entering the PEO. The second is an extensive inspection of completion of renewed license conditions and LR commitments. It occurs a few months prior to entry into the PEO, and after the licensee has notified the NRC that they have completed their commitments. The third inspection is a follow-up inspection after entry into the PEO. Its purpose is primarily to look at commitments that had completion dates after entry into the PEO.

Attachment 1- Aging Management Programs and Corresponding Implementation Activities

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
N/A	Plant-Specific Transmission Conductor, Connections, Insulators and Switchyard Bus and Connections	B2.1.40	Create new Procedure, TS1.DC1, "License Renewal Electrical Aging Management" (Elements 1, 5, 7)	December 2011 Draft complete;	
N/A	Plant-Specific Transmission Conductor, Connections, Insulators and Switchyard Bus and Connections	B2.1.40	Modify/create work orders to state that there is a regulatory requirement	December 2011	
N/A	Plant-Specific Transmission Conductor, Connections, Insulators and Switchyard Bus and Connections	B2.1.40	Enhance program procedures to identify components to support SBO recovery which are in scope of LR, include gathering and reviewing completed maintenance and inspection results, and identify an engineering evaluation to conduct when a degraded condition is identified.	December 2011	50333342
X.E1	Environmental Qualification (EQ) of Electrical Components	B3.2	Complete additional work on EQ files whose qualified life needs to be extended to 60 years.	TBD	
X.M1	Metal Fatigue of Reactor Coolant Pressure Boundary	B3.1	The scope of locations monitored by the DCPD Fatigue Management Program will be enhanced to include additional locations which are not covered by the current Fatigue Management Program. Additional locations will include the NUREG/CR-6260 locations for the effects of the reactor coolant environment on fatigue. Usage factors in the NUREG/CR-6260 sample locations will include the environmental factors, F(en), calculated by NUREG/CR-6583 and NUREG/CR-5704 or appropriate alternative methods (Elements 1, 2, and 5).	December 2011	50333282
X.M1	Metal Fatigue of Reactor Coolant Pressure Boundary	B3.1	The scope of transients monitored by the DCPD Fatigue Management Program will be enhanced to include additional transients that contribute to fatigue usage, which are not covered by the current Fatigue Management Program. Usage factors in the NUREG/CR-6260 sample locations will include the environmental factors, F(en), calculated by NUREG/CR-6583 and NUREG/CR-5704 or appropriate alternative methods (Elements 1 and 3).	December 2011	50333282

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
X.M1	Metal Fatigue of Reactor Coolant Pressure Boundary	B3.1	The procedures governing the DCPD Fatigue Management Program will be enhanced to specify the frequency of periodic reviews of the results of the monitored cycle count and CUF data at least once per fuel cycle. This review will compare the results against the corrective action limits to determine any approach to action limits and any necessary revisions to the fatigue analyses will be included in the corrective actions (Element 4).	December 2011	50333282
X.M1	Metal Fatigue of Reactor Coolant Pressure Boundary	B3.1	<p>The procedures governing the DCPD Fatigue Management Program will be enhanced to include additional cycle count and fatigue usage action limits, which will invoke appropriate corrective actions if a component approaches a cycle count action limit or a fatigue usage action limit. Action limits permit completion of corrective actions before the design limits are exceeded (Elements 2 and 6).</p> <p>Cycle Count Action Limits: An action limit initiates corrective action when the cycle count for any of the critical thermal or pressure transients is projected to reach the action limit defined in the program before the end of the next fuel cycle. In order to assure sufficient margin to accommodate occurrence of a low probability transient, corrective actions must be initiated before the remaining number of allowable cycles for any specified transient becomes less than one (Reference: TLAA Report, Section 3.1.3).</p> <p>Cumulative Fatigue Usage (CUF) Action Limits: An action limit requires corrective action when calculated cumulative usage factor (CUF) for any monitored location is projected to reach 1.0 within the next 3 fuel cycles (Reference: TLAA Report, Section 3.1.3).</p>	December 2011	50333282
X.M1	Metal Fatigue of Reactor Coolant Pressure Boundary	B3.1	The procedures governing the DCPD Fatigue Management Program will be enhanced to include appropriate corrective actions to be invoked if a component approaches a cycle count action limit or a fatigue usage action limit. The corrective action options for a component that has exceeded action limits include a revised fatigue analysis or repair or replacement of the component (Element 7).	December 2011	50333282

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.E1	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.24	Implement program as described in B2.1.24	<ol style="list-style-type: none"> 1. Complete initial identification of Hazardous Localized Areas – June 2011 2. Issue procedure with an effective date of PEO December 2011 	50332312
XI.E1	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.24	Create new procedure, TS1.DC1, "License Renewal Electrical Aging Management" (Elements 1, 3, 4, 6, and 7)	See above	
XI.E1	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.24	Perform inspections	See above	
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	Implement program as described in B2.1.25	December 2011	50332314
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	STP I-39-R44A.B will be enhanced to require an engineering evaluation per TS1.DC1 when the calibration or surveillance results fail to meet acceptance criteria. (Elements 4, 7)	Markup complete. See E-2 above.	
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	STP I-39-R44B.B will be enhanced to require an engineering evaluation per TS1.DC1 when the calibration or surveillance results fail to meet acceptance criteria. (Elements 4, 7)	Markup complete. See E-2 above.	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	STP I-118B2 will be enhanced to require an engineering evaluation per TS1.DC1 when the calibration or surveillance results fail to meet acceptance criteria. (Elements 4, 7)	Markup complete. See E-2 above.	
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	STP I-119B3 will be enhanced to require an engineering evaluation per TS1.DC1 when the calibration or surveillance results fail to meet acceptance criteria. (Elements 4, 7)	Markup complete. See E-2 above.	
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	New Procedure, TS1.DC1, "License Renewal Electrical Aging Management" (Elements 1, 3, 4, 6, 7)	Draft complete. December 2011	
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	Create program health report	?	
XI.E2	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	B2.1.25	Create test procedure	December 2011	
XI.E3	Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.26	Implement program as described in B2.1.26	December 2011	50333088
XI.E3	Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.26	Create TS1.DC1, "License Renewal Electrical Aging Management" (Elements 1, 3, 4, 6, 7)	Draft complete. See E-3 above	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.E3	Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.26	Modify existing work orders for pullbox inspections to note that they are a regulatory requirement	December 2011	
XI.E3	Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.26	Review actual pullbox inspection frequencies versus winter/rainstorm result	Complete?	
XI.E4	Metal Enclosed Bus	B2.1.36	The existing bus work order inspection activities for inspection and testing of the MEBs will be proceduralized to include specific inspection scope, frequencies, actions to be taken when acceptance criteria are not met.	December 2011	50333175
XI.E4	Metal Enclosed Bus	B2.1.36	Create TS1.DC1, "License Renewal Electrical Aging Management" (Elements 1, 3, 4, 6, 7)	Draft complete. See E-4 above	
XI.E4	Metal Enclosed Bus	B2.1.36	Modify existing work orders for pullbox inspections to note that they are a regulatory requirement	December 2011	
XI.E5	Fuse Holders	B2.1.34	Implement program as described in B2.1.34	Issue procedure by December 2011 with an implementation date of PEO.	50332313
XI.E5	Fuse Holders	B2.1.34	Prior to AMP audit, create new Procedure, TS1.DC1, "License Renewal Electrical Aging Management" (Elements 1, 3, 4, 6, 7)	Draft complete. See E-5 above.	
XI.E5	Fuse Holders	B2.1.34	Need work orders which state that there is a regulatory requirement	Issue work order revisions December 2011	
XI.E6	Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.35	Implement program as described in B2.1.35	Prior to PEO. WE NEED MORE DETAIL ON WHAT IS REQUIRED SO THAT WE CAN DETERMINE THE ACTION PLAN	50332314
XI.E6	Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.35	Create new Procedure, TS1.DC1, "License Renewal Electrical Aging Management" (Elements 1, 3, 4, 6, 7)	Draft complete. See E-6 above	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.E6	Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	B2.1.35	Need a basis document for sample selection	December 2011	
XI.M12	Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)	B2.1.39	Implement a program as described in B2.1.39	Issue procedure December 2011 with an effective date of 2014 (10 years prior to PEO)	50332315
XI.M12	Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)	B2.1.39	Finalize basis document for determining the potentially susceptible locations (Complete but not accepted by plant yet)	December 2011	
XI.M12	Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)	B2.1.39	Create implementation procedure	December 2011	
XI.M12	Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)	B2.1.39	Perform inspections	See M12 above.	
XI.M12	Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)	B2.1.39	Participate in the EPRI working group on CASS (C. Beard)	On-going	
XI.M12	Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)	B2.1.39	Create program health report	?	
XI.M21	Closed-Cycle Cooling Water System	B2.1.10	Periodic internal inspections of the CCW supply isolation check valves to the reactor coolant pumps (valves CCW-1-585 and CCW-2-585) will provide a leading indicator of the condition of the interior of piping components otherwise inaccessible for visual inspection. This periodic internal inspection will detect loss of material and fouling and are scheduled to be performed at least once every 5 years.	Implement procedure December 2011 with an effective date of PEO	50333808
XI.M21	Closed-Cycle Cooling Water System	B2.1.10	Plant procedures will be enhanced to include the acceptance criteria.	December 2011	
XI.M21	Closed-Cycle Cooling Water System	B2.1.10	Evaluate current plans to open the valves that will be inspected.	December 2011	
XI.M21	Closed-Cycle Cooling Water System	B2.1.10	Create work orders to perform inspections. The commitment needs to be in the work order	December 2011	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.M21	Closed-Cycle Cooling Water System	B2.1.10	Revise procedures to monitor the corrosion of closed cooling water components by inspecting the condition of corrosion coupons installed in the system and perform internal inspections of select components within the systems.	Issue procedure revisions by December 2011 with an effective date of PEO	50321512/2
XI.M26	Fire Protection	B2.1.12	Procedure STP M-70C (or a general fire protection program plan) will be enhanced to include inspection of all fire rated doors listed in Appendix 9.5A, the DCPD Fire Hazards Analysis. (Elements 1 & 3)	Revise procedures by December 2011 with an effective date of PEO	50332107
XI.M26	Fire Protection	B2.1.12	Develop action plan to identify fire doors to include inspection of all fire rated doors listed in Appendix 9.5A, the DCPD Fire Hazards Analysis that are not included in the procedure.	December 2011	50332107
XI.M26	Fire Protection	B2.1.12	Procedure STP M-70B (or a general fire protection program plan) will be enhanced to include qualification criteria for individuals performing inspections of fire dampers in accordance with NUREG-1801. (Element 4)	December 2011	
XI.M26	Fire Protection	B2.1.12	Procedure STP M-70C (or a general fire protection program plan) will be enhanced to include qualification criteria for individuals performing inspections of fire doors in accordance with NUREG-1801. (Element 4)	December 2011	
XI.M27	Fire Water System	B2.1.13	1) The Fire Protection Program will be enhanced so sprinkler heads in service for 50 years will be replaced or representative samples from one or more sample areas will be tested consistent with guidance of NFPA 25, "Inspection, Testing and Maintenance of Water-Based Fire Protection Systems." Test procedures will be repeated at 10-year intervals during the period of extended operation, for sprinkler heads that were not replaced, prior to being in service for 50 years, to ensure that signs of degradation, such as corrosion, are detected prior to the loss of intended function. (Element 4) Note: That the 50 year period begins at the date of installation/replacement.	Revise procedures by December 2011 with an effective date of the PEO.	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.M27	Fire Water System	B2.1.13	Procedures will be enhanced for either periodic, non-intrusive volumetric examinations or visual inspections on fire water piping, in accordance with NUREG-1801. Non-intrusive volumetric examinations would detect any loss of material due to corrosion, to ensure that aging effects are managed, wall thickness is within acceptable limits and degradation will be detected before the loss of intended function. Visual inspections would evaluate (1) wall thickness as it applies to avoidance of catastrophic failure, and (2) the inner diameter of the piping as it applies to the design flow of the Fire Protection System. The volumetric examination technique employed will be one that is generally accepted in the industry, such as ultrasonic or eddy current. See Open Item 1. (Element 4)	Revise procedures by December 2011 with an effective date of the PEO	
XI.M27	Fire Water System	B2.1.13	Procedure STP M-71 will be enhanced to state trending requirements. (Element 5)	December 2011	
XI.M27	Fire Water System	B2.1.13	Update the PM basis documents for STR-97 and STR-98 to state that there is a license renewal commitment to inspect the strainers on a 24 month frequency	December 2011	50342432/2
XI.M30	Fuel Oil Chemistry	B2.1.14	Revise STP M-91A, the Diesel Fuel Oil Storage Tank 10 Year Drain, Clean, and Internal Inspection procedure, to include the periodic draining, cleaning, and visual inspection of the diesel generator day tanks, portable diesel driven fire pump fuel oil tanks, and portable caddy fuel oil tanks.	Revise procedure by December 2011 with an effective date of the PEO.	
XI.M30	Fuel Oil Chemistry	B2.1.14	Revise STP P-24 to include sampling of the new fuel oil prior to introduction into the portable diesel driven fire pump tanks and portable caddy fuel oil tanks.	Issue procedure by December 2011 with an effective date of the PEO.	
XI.M30	Fuel Oil Chemistry	B2.1.14	Revise STP M-91A, the Diesel Fuel Oil Storage Tank 10 Year Drain, Clean, and Internal Inspection procedure, to provide for supplemental ultrasonic thickness measurements if there are indications of reduced cross sectional thickness found during the visual inspection of the diesel fuel oil storage tanks, diesel generator day tanks, portable diesel driven fire pump fuel oil tanks, and portable caddy fuel oil tanks.	Issue procedure by December 2011 with an effective date of the PEO.	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.M30	Fuel Oil Chemistry	B2.1.14	Revise STP M-10B, the Diesel Fuel Oil Testing procedure for the diesel fuel oil storage tanks and diesel generator day tanks to state that trending of water and particulate levels is controlled in accordance with DCCP Technical Specifications and plant procedures.	December 2011	
XI.M30	Fuel Oil Chemistry	B2.1.14	Revise STP P-24 and CAP A-9 to include monitoring and trending of water and sediment levels of new fuel oil for the portable diesel driven fire pump fuel oil tanks and portable caddy fuel oil tanks.	December 2011	
XI.M30	Fuel Oil Chemistry	B2.1.14	Revise STP P-24 to state acceptance criteria for new fuel oil being introduced into the portable diesel driven fire pump fuel oil tanks or portable caddy fuel oil tanks. 7) Add the inspection port	Revise procedure by December 2011. Add inspection port prior to the PEO.	
XI.M30	Fuel Oil Chemistry	B2.1.14	Revise program commitment, Provide for one-time supplemental ultrasonic thickness measurements of accessible portions of fuel oil tank bottoms.	Issue procedure and associated work orders by December 2011 with an effective date of the PEO.	
XI.M32	One-Time Inspection	B2.1.16	Finalize basis document for determining the sample size and locations prior to NRC AMP audit	June 2011	
XI.M32	One-Time Inspection	B2.1.16	During the 10 years prior to PEO, implement program as described in LRA Section B2.1.16	Issue procedure by December 2011 with an effective date of 2014.	50332273
XI.M32	One-Time Inspection	B2.1.16	Need to determine actual inspection locations.	December 2011	
XI.M32	One-Time Inspection	B2.1.16	Create implementation procedure	Draft complete. Issue procedure December 2011	
XI.M32	One-Time Inspection	B2.1.16	Perform one time inspections	During the 10 years prior to PEO.	
XI.M32	One-Time Inspection	B2.1.16	Create program health report	?	
XI.M32	One-Time Inspection	B2.1.16	A one time UT examination of the firewater tank bottom will be performed as part of the One-Time Inspection aging management program, LRA Section B2.1.16.	Issue procedure and work orders by December 2011 with an effective date of 2014.	
XI.M32	One-Time Inspection	B2.1.16	DCCP will perform 100 percent eddy current testing of one non-regenerative heat exchanger	2014 - 2024	50343158/2
XI.M34	Buried Piping and Tanks Inspection	B2.1.18	During the 10 years prior to PEO, implement a program as described in LRA section B2.1.18	December 2011	50332277

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.M34	Buried Piping and Tanks Inspection	B2.1.18	Develop action plan for EPRI Buried Piping	Complete	
XI.M34	Buried Piping and Tanks Inspection	B2.1.18	Create implementation procedure	Complete	
XI.M34	Buried Piping and Tanks Inspection	B2.1.18	Perform inspections during 10 years prior to PEO	2014-2024	
XI.M34	Buried Piping and Tanks Inspection	B2.1.18	Create program health report	?	
XI.M35	One-Time Inspection of ASME Code Class 1 Small-Bore Piping	B2.1.19	Determine appropriate sample size	DCL-10-146 - complete	50340356/1
XI.M35	One-Time Inspection of ASME Code Class 1 Small-Bore Piping	B2.1.19	Determine inspection locations	December 2011 and issue work orders with an effective date of 2024?	
XI.M35	One-Time Inspection of ASME Code Class 1 Small-Bore Piping	B2.1.19	DCPP will volumetrically examine 10%, with a maximum of 25, of the small bore socket welds and 10%, with a maximum of 25, of the butt welds within the population of ASME Class-1 piping NPS less than 4-inches on each unit. Currently, DCPP has 696 socket welds in Unit 1, 841 socket welds in Unit 2, 134 butt welds in Unit 1, and 133 butt welds in Unit 2. Based on the current weld count, this would result in the examination of 25 socket welds for Unit 1, 25 socket welds for Unit 2, 13 butt welds for Unit 1 and 13 butt welds for Unit 2. DCPP may perform opportunistic destructive examination of welds in lieu of volumetric examination with 1 destructive examination being equivalent to 2 volumetric examinations.	During 6 years prior to PEO	50340356/1
XI.M35	One-Time Inspection of ASME Code Class 1 Small-Bore Piping	B2.1.19	Schedule and perform inspections	Schedule inspections by December 2011.	
XI.M36	External Surfaces Monitoring Program	B2.1.20	During the 10 years prior to PEO, implement as described in B2.1.20	December 2011	50332220
XI.M36	External Surfaces Monitoring Program	B2.1.20	Create implementation procedure (Draft is created, need to determine when to implement)	December 2011. Draft complete	
XI.M36	External Surfaces Monitoring Program	B2.1.20	Generate AMR table that shows where this AMP is credited (R. Davis)	December 2011	
XI.M36	External Surfaces Monitoring Program	B2.1.20	Develop and implement training for system engineers	December 2011	50335453

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.M36	External Surfaces Monitoring Program	B2.1.20	Perform inspections	December 2011	
XI.M36	External Surfaces Monitoring Program	B2.1.20	The DCPD external surfaces monitoring program will be revised to include visual inspections of the ASW system to inspect for cracking and leakage of the titanium tubing components in scope for license renewal at intervals no longer than once per refueling cycle.	Prior to PEO	
XI.M38	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components	B2.1.22	Implement a program as described in B2.1.22	Issue procedure December 2011 with an effective date of 2024.	50332278
XI.M38	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components	B2.1.22	Create basis document for sample locations	. December 2011. Draft complete	
XI.M38	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components	B2.1.22	Create implementation procedure	December 2011. Draft complete	
XI.M38	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components	B2.1.22	Perform inspections	2024-2044	
XI.M38	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components	B2.1.22	Create program health report	?	
XI.M39	Lubricating Oil Analysis	B2.1.23	New Procedure MA1.DC53, Lubricating Oil Analysis will be developed to govern the Lubricating Oil Analysis program testing, evaluation, and disposition for in-scope equipment. (Element 1)	December 2011. Draft complete	50333087
XI.M39	Lubricating Oil Analysis	B2.1.23	DCPD will include guidance for oil sampling for chemical and physical properties in new procedure MA1.DC53. (Element 2)	December 2011. Draft complete	50333087
XI.M39	Lubricating Oil Analysis	B2.1.23	DCPD will include standard analyses that will be performed on oils in new procedure MA1.DC53. (Element 3)	December 2011. Draft complete	50333087

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.M39	Lubricating Oil Analysis	B2.1.23	DCPP acceptance criteria for each of the lubricating oils commonly used on-site, including the oils associated with each of the equipments within the scope of the Lubrication Analysis Program (see Element 1) will be included new procedure MA1.DC53, with provision for future adjustment in acceptance criteria. DCPP acceptance criteria for lubricating oil analysis will be derived from Original Equipment Manufacturer (OEM) Vendor Manuals, industry guidance, and qualified offsite laboratories. (Elements 4 and 6)	December 2011. Draft complete	50333087
XI.M39	Lubricating Oil Analysis	B2.1.23	DCPP will include trending in new procedure MA1.DC53. (Element 5)	December 2011. Draft complete	50333087
XI.M39	Lubricating Oil Analysis	B2.1.23	Procedure will be enhanced to state actions to address conditions where action limits are reached or exceeded. (Element 7)	December 2011. Draft complete	50333087
XI.M39	Lubricating Oil Analysis	B2.1.23	Create a program health report	?	
XI.S1	ASME Section XI, Subsection IWE	B2.1.27	Include in Commitment Tracking	May 2011	
XI.S1	ASME Section XI, Subsection IWE	B2.1.27	The Unit 2 gap repair work will be completed prior to the period of extended operation.	2024	50323785
XI.S2	ASME Section XI, Subsection IWL	B2.1.28	Include in Commitment Tracking.	May 2011	
XI.S2	ASME Section XI, Subsection IWL	B2.1.28	DCPP procedures will be revised to perform concrete inspections per ASME Section XI Subsection IWL within a 5 year interval.	June 2011	50323785
XI.S2	ASME Section XI, Subsection IWL	B2.1.28	Calculation No. 2305C will be revised by November 1, 2010 to be consistent with the latest revision of Procedure NDE VT 3C-1.	Complete	
XI.S2	ASME Section XI, Subsection IWL	B2.1.28	Calculation No. 2305C acceptance criteria will be consistent with the latest revision of Procedure NDE VT 3C-1. Any long term planning and decisions on potential repair will be made on a case by case basis and based on review of trends in the inspection findings and will be implemented via DCPP corrective action program.	Complete	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.S2	ASME Section XI, Subsection IWL	B2.1.28	Procedure NDE VT 3C-1 and Calculation No. 2305C acceptance criteria will be revised to be consistent with ACI 349.3R Chapter 5 detailed quantitative acceptance criteria with the exception that the First Tier, the allowable crack width of 0.015" (per ACI 349.3, Section 5.1) is increased to 0.025" for areas not around penetrations and embedments.	Complete	
XI.S6	Structures Monitoring Program	B2.1.32	Include in Commitment Tracking.	May 2011	
XI.S6	Structures Monitoring Program	B2.1.32	DCPP work control procedures will be revised to include evaluation of reinforced concrete exposed during excavations.	June 2011	50323785
XI.S6	Structures Monitoring Program	B2.1.32	Prior to the period of extended operation, the acceptance criteria for concrete structural elements provided in the implementing procedures for the Structures Monitoring Program for safety-related structures will be revised to incorporate the quantitative evaluation criteria provided in ACI 349.3R, Evaluation of Existing Nuclear Safety Related Concrete Structures, Chapter 5, Evaluation Criteria.	June 2011	
XI.S6	Structures Monitoring Program	B2.1.32	The Structures Monitoring Program inspection interval will be revised to be aligned with the guidance in ACI 349.3R, Evaluation of Existing Nuclear Safety Related Concrete Structures, Chapter 6, Evaluation Frequency, except for the exterior of non-safety related structures, for which all accessible areas of both units will be inspected at an interval of no more than ten years.	June 2011	
XI.S6	Structures Monitoring Program	B2.1.32	A one-time video inspection of the Unit 2 leak chase will be performed during the period of extended operation	Issue work order December 2011. Perform inspection 2024-2044	
XI.S6	Structures Monitoring Program	B2.1.32	Revise the work control procedure to require that whenever an in-scope pullbox is opened that the Structural Monitoring AMP personnel are notified to allow them to determine if an opportunistic inspection should be performed.	June 2011	50324705
XI.S7	RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants	B2.1.33	Include in Commitment Tracking.	May 2011	
XI.S7	RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants	B2.1.33	Program will be enhanced to commit to a 5 year inspection frequency for all structures captured in this program for the period of extended operation	June 2011	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
N/A	Plant-Specific Nickel-Alloy Aging Management Program	B2.1.37	Include in Commitment Tracking.	May 2011	
N/A	Reactor Coolant System Supplement		Include in Commitment Tracking.	May 2011	
XI.M1	ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD	B2.1.1	Include in Commitment Tracking.	May 2011	
XI.M10	Boric Acid Corrosion	B2.1.4	Include in Commitment Tracking.	May 2011	
XI.M11A	Nickel-Alloy Penetration Nozzles Welded To The Upper Reactor Vessel Closure Heads of Pressurized Water Reactors	B2.1.5	Include in Commitment Tracking.	May 2011	
XI.M17	Flow-Accelerated Corrosion	B2.1.6	Include in Commitment Tracking.	May 2011	
XI.M18	Bolting Integrity	B2.1.7	Include in Commitment Tracking.	May 2011	
XI.M19	Steam Generator Tube Integrity	B2.1.8	Include in Commitment Tracking.	May 2011	
XI.M2	Water Chemistry	B2.1.2	Include in Commitment Tracking.	May 2011	
XI.M20	Open-Cycle Cooling Water System	B2.1.9	Include in Commitment Tracking.	May 2011	
XI.M23	Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems	B2.1.11	Revise plant procedures to specify that visual inspection for corrosion of structural members of the containment dome service crane and special service hoists, jib cranes, and monorails	December 2011	50329611/2
XI.M3	Reactor Head Closure Studs	B2.1.3	Include in Commitment Tracking.	May 2011	
XI.M31	Reactor Vessel Surveillance	B2.1.15	Include in Commitment Tracking.	May 2011	
XI.M33	Selective Leaching of Materials	B2.1.17	During the 10 years prior to PEO, implement program a described in B2.1.17	2014-2024	50332275
XI.M37	Flux Thimble Tube Inspection	B2.1.21	Revise the test procedure acceptance criteria to specifically preclude repositioning a tube more than once without capping or replacing. This will include repositioning a tube having chrome plated surfaces from the chrome being moved out of the areas of known wear.	April 2011	50329603
XI.S1	ASME Section XI, Subsection IWE	B2.1.27	Include in Commitment Tracking.	May 2011	
XI.S3	ASME Section XI, Subsection IWF	B2.1.29	Include in Commitment Tracking.	May 2011	

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.S4	10 CFR Part 50, Appendix J	B2.1.30	Include in Commitment Tracking.	May 2011	
XI.S5	Masonry Wall Program	B2.1.31	Include in Commitment Tracking.	May 2011	
	Pressurized Thermal Shock	A3.1.2	At least 3 years prior to exceeding the PTS screening criterion of 10 CFR 50.61, PG&E will implement the revised PTS rule (10 CFR 50.61a)	Determine action plan December 2011	50333287
	Pressure-Temperature Limits	A3.1.4	Prior to operation beyond 23 EFY, DCPD will re-evaluate the RCS pressure-temperature limits and COMS setpoints as necessary to comply with 10 CFR 50 Appendix G.	Determine action plan	50334705
	Effects of the RCS Environment on Fatigue Life of Piping Components (GSI 190)	A3.2.3	DCPD will repair or replace the hot leg surge nozzle, or augment the ISI program to require ASME Section XI volumetric examination at regular intervals	Determine action plan December 2011	50333220
	TLAA	4.3	The actual plant transient cycles related to the SWOL and Model 93A Reactor Coolant Pumps fatigue crack growth analyses will be included in the existing plant transient monitoring program by January 31, 2011 to ensure that the actual plant transients do not exceed the L fatigue analysis limits.	January 31, 2011	
		3.1.2.1.2	Aluminum tape currently installed on the seams of the Unit 1 RMI insulation panels of the pressurizer loop seals is currently scheduled to be removed during the Unit 1 sixteenth refueling outage (12R16) outage, October 2010.	Complete	
		2.3.3.5	Procedures will be enhanced to provide specific valves that need to be repositioned to provide Class I makeup to the spent fuel pool including the correct position of any normally open code break valves. Reference PG&E Letter DCL-10-133	March 1, 2011	50347309

NUREG-1801 Section	NUREG-1801 PROGRAM	LRA Section	Implementation Action(s)	Implementation Schedule	Tracking SAPN/ Task
XI.S6	Structures Monitoring Program	B2.1.32	Enhance the Structures Monitoring program procedures to: <ul style="list-style-type: none"> • Monitor groundwater samples every five years for pH, sulfates and chloride concentrations, including consideration for potential seasonal variations, and • Specify inspections of bar racks and associated structural components in the intake structure. • Inspect the administration building, the elevated walkway connecting the turbine building to the administration building, and the structural members that support the walkway. 	01/01/12	50340501