



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

January 17, 2012

Mr. John T. Conway
Senior Vice President - Energy Supply
and Chief Nuclear Officer
Pacific Gas and Electric Company
Diablo Canyon Power Plant
77 Beale Street, Mail Code B32
San Francisco, CA 94105

SUBJECT: DIABLO CANYON POWER PLANT, UNIT NOS. 1 AND 2 - AUDIT OF THE
LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS (TAC
NOS. ME7284 AND ME7285)

Dear Mr. Conway:

In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the NRC informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

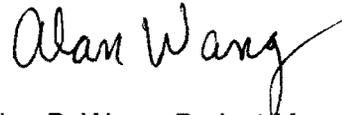
An audit of the Diablo Canyon Power Plant, Units 1 and 2, commitment management program was performed at the plant site during the period October 18-21, 2011. Based on the audit, the NRC staff concludes that Pacific Gas and Electric Company (the licensee) has implemented NRC commitments on a timely basis, and has implemented its program for managing NRC commitment changes with programmatic inconsistencies and deficiencies noted. The details of the results of the audit are set forth in the enclosed audit report.

J. Conway

- 2 -

If you have any questions, please contact me at 301-415-1445 or via e-mail at alan.wang@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "Alan Wang". The signature is written in a cursive style with a long, sweeping underline.

Alan B. Wang, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:
Audit Report

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

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-275 AND 50-323

1.0 INTRODUCTION AND BACKGROUND

In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), the NRC informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

NEI 99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Diablo Canyon Power Plant, Units 1 and 2 (DCPP), commitment management program was performed at the plant site during the period October 18-21, 2011, and discussed during a teleconference on November 10, 2010, with members of the Pacific Gas and Electric Company (PG&E, the licensee) staff. The audit reviewed commitments made by the licensee

Enclosure

since the previous audit on September 17-18, 2008, which was documented in an audit report dated October 22, 2008 (ADAMS Accession No. ML082800342). The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, relief requests, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff performed a search in ADAMS for the licensee's submittals since the last audit and selected a representative sample for verification.

The audit excluded the following types of commitments that are internal to licensee processes:

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The attached Audit Summary – Implementation of Commitments (Attachment 1) provides details of the audit and its results.

For reference, the licensee's "recurring task" commitments are tracked in the computer-based Procedure Commitment Database (PCD) while "single task" commitments are tracked elsewhere (most typically in the corrective action program and in a regulatory services stand-alone spreadsheet). The licensee's commitments are managed in accordance with DCPP administrative procedure XI4.ID1, "Commitment Identification and Tracking Process,"

Revision 6A. For this audit, the NRC staff reviewed the selected sample of open and closed regulatory commitments to confirm that the licensee had implemented closed commitments appropriately, and that commitments still open had been captured in an effective program for future implementation as required by DCP. The NRC staff reviewed relevant reports and summary sheets from the computer database and other sources (e.g., corrective action documentation, plant procedures, job numbers, documented training, etc.) providing the status of each commitment, form of implementation, and any pending further action. In addition, the NRC staff reviewed two licensee self assessments of its "NRC Commitment Management" in the "2009 Technical Specification and Testing Audit" dated October 23, 2009, and the "2011 Technical Specification Audit" dated October 5, 2011.

Based on the review of reports provided by the licensee as described above and on queries of the PCD, the corrective action program, and the regulatory services stand-alone spreadsheet during the audit, the NRC staff found that the licensee has generally implemented commitments on a timely basis (as documented in Attachment 1).

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling regulatory commitments to the guidelines in NEI 99-04, which the NRC has found to be an acceptable guide for licensees to follow for managing and changing commitments. The process used at the DCP is contained in administrative procedure XI4.ID2, "Commitment Change Process," Revision 9 with accompanying change form DCP 69-20200, "Commitment Change Request" dated April 12, 2010. The auditors reviewed a sample of commitment changes that included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC. The auditors also verified that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that the licensee's personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.2.1 Audit Results

The attached Audit Summary - Management of Changes to Regulatory Commitments (Attachment 2) provides details of this portion of the audit and its results.

The NRC staff reviewed procedure XI4.ID2 and its required form to determine whether the licensee had an effective program in place to identify, manage, and close commitments made to the NRC as part of licensing actions/activities. In addition, the NRC staff reviewed relevant reports and summary sheets from the computer database and other sources providing the status of each commitment, tracking and change forms, and other associated documentation.

The NRC staff compared the guidance in the DCP administrative procedure XI4.ID2 to the guidance in NEI 99-04. As a result of this comparison, the NRC staff found that the DCP procedure was consistent with the NEI guidance for identifying, managing, and closing

commitments and that the roles and responsibilities, processes, and metrics were clearly identified in the DCPD procedure with the following programmatic exceptions:

- (1) The NRC staff reviewed procedure XI4.ID1 and noted in step 3.6.2 that “the following types of commitments are maintained by their respective departments: a. Security Program Commitments, b. Training Program Commitments.” NRC staff interviews with licensee Security and Training (Learning Services) personnel revealed that neither department had established a commitment tracking or management program either formally or informally. Neither department had created commitment management procedures, nor did they have a list or mechanism to centrally track known and existing departmental commitments.

Additionally, in Action Request (AR) A0641042, dated June 25, 2005, Learning Services specifically stated that “the ability to embed the PCD entry into Training procedures is a very important tool for use by learning services” and that “the use of PCD to register commitments from federal, state, ..., is a keystone to the rigor.” In this AR, Regulatory Services discussed the use of a new process (nexus) to “improve capabilities ... for management of commitments in RS [regulatory services], LS [learning services], and security.” This AR was closed based on the eventual arrival of the new process and the commitment to continue manual tracking of Learning Services commitments.

Based on the above review, the NRC staff identified that this commitment management program gap for Security and Learning Services was originally identified by the licensee as early as June 2005, was discussed generally as item 2.5.(b) in the previous NRC commitment audit report, and was not corrected by the time of this audit with the new process in place. No safety significant issues connected to this programmatic deficiency were noted. The licensee initiated Notification number 50435195 to address this issue.

- (2) The NRC staff review of XI4.ID1, “Commitment Identification and Tracking Process” revealed that only “recurring task” commitments are entered into the PCD while “single task” commitments are tracked elsewhere (most typically in the corrective action program and in a regulatory services stand-alone spreadsheet). XI4.ID1 states in step 3.2.1 that a single task commitment is “a commitment type that can be resolved and implemented by a one time action that does not require a controlled process to ensure its continued and consistent implementation.” NRC staff interviews with the licensee’s personnel revealed that while there is not an explicit prohibition to using XI4.ID2, “Commitment Change Process” with its change management flowchart for “single task” commitments, site practice and procedural intent is to utilize XI4.ID2 for PCD entered “recurring task” commitments only.

Further NRC staff interviews with the licensee’s personnel revealed that should there be a change required to a “single task” commitment, then the review process for modification of a corrective action program corrective action would evaluate the change. Following a review of modified “single task” commitments, the NRC staff identified that the NEI 99-04 flowchart guidance within

Attachment 1 of XI4.ID2 and Form DCP 69-20200 were not being utilized to evaluate the notification or evaluation needed for this commitment change. Attachment 2 below provides specific examples of this issue with recent "single task" commitments. No safety significant issues connected to this programmatic deficiency were noted. The licensee initiated Notification number 50435196 to address this issue.

Based on the review of the reports provided by the licensee as described above, queries of the PCD, the corrective action program, and the regulatory services stand-alone spreadsheet and the accompanying change review and tracking forms provided during the audit, the NRC staff found that the licensee's implementation of its program for managing NRC commitment changes is in accordance with its site procedure with the programmatic deficiencies noted above in the examples documented in Attachment 2.

3.0 CONCLUSION

Based on the audit, the NRC staff concludes that (1) the licensee has generally implemented NRC commitments on a timely basis, and (2) the licensee has implemented its program for managing NRC commitment changes with programmatic inconsistencies and deficiencies noted.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Steven Zawalick
Corrado Sansone
Mark Padovan
Philippe Soenen

Principal Contributor: James T. Polickoski

Date: January 17, 2012

Attachments:

1. Audit Summary - Implementation of Commitments
2. Audit Summary - Management of Changes to Regulatory Commitments

ATTACHMENT 1

AUDIT SUMMARY - IMPLEMENTATION OF COMMITMENTS

OCTOBER 18-21, 2011

DIABLO CANYON POWER PLANT, UNITS 1 AND 2

AUDIT SUMMARY - IMPLEMENTATION OF COMMITMENTS

OCTOBER 18-21, 2011

DIABLO CANYON POWER PLANT, UNITS 1 AND 2

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
GL	DCL-11-035	3/17/2011	Supplement to Response to Nuclear Regulatory Commission (NRC) Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	No explicit number, tracked as a "one-time commitment" per XI4.ID1.	Pacific Gas and Electric Company (PG&E) will perform an ultrasonic test (UT) inspection at this local high point to inspect for gas accumulation following the dynamic venting of the residual heat removal (RHR) heat exchangers coming out of Unit 2 Refueling Outage Sixteen (2R16) and Unit 2 Refueling Outage Seventeen (2R17).	Notification 50037662	CLOSED – Commitment completed for 2R16 as described.
GL	DCL-08-090	10/14/2008	Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	The 16 th commitment in the PG&E letter but has no programmatic number since tracked as a "one-time commitment" per XI4.ID1.	PG&E will require that dynamic venting be performed for 10/11/2009 each unit to flush out any gas from the RHR heat exchanger after each reactor coolant system (RCS) vacuum refill operation by 10/11/2009.	Notification 50037662	CLOSED – Commitment closed as a "recurring task" commitment to T36602 and is implemented in Operating Procedure (OP) B-2:XI.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
BL	BL 2007-01 DCL-08-011	2/7/2008	Physical Security Plan Change	No explicit number. It is a Security commitment with no current tracking system. It would be classified as a "recurring task" commitment per XI4.ID1.	Implement a Physical Security Plan change to perform training In Security Department procedure SP 210.	NCR 60025143 NCR 60027840	CLOSED – Commitment implemented in the Physical Security Plan training procedure as a document reference. As Security commitments are not tracked in the Procedure Commitment Database (PCD), the training procedure is the only reference for its completion.
Other	DCL-05-058	5/25/2005	B5b	1.16	Commitment that is security related and withheld from public disclosure in accordance with Title 10 of the <i>Code of Federal Regulations</i> Section 2.390 (10 CFR 2.390).	STP M-67 ECG 18.2	CLOSED – Commitment closed and implemented via STP M-67B-1.
Other	DCL-07-001	1/11/2007	B5b	1.30	Commitment that is security related and withheld from public disclosure in accordance with 10 CFR 2.390.	Notification 50382443 EP MT-21	CLOSED – Commitment closed and implemented via Notification 50382443, Tasks 2 and 3 to include verification of equipment in its location.
Other	DCL-07-051	5/8/2007	B5b	2.60	Commitment that is security related and withheld from public disclosure in accordance with 10 CFR 2.390.	CP M-6 FTFT 001 FTFTD 009 Notification 50399546	CLOSED – Commitment closed and implemented via CP M-6 and Notification 50399546 Task 11 with training held over the last 4 years.
LAR	DCL-09-009	4/24/2009	Revision to Technical Specification (TS) 3.3.1	No explicit number, tracked as a "one-time commitment" per XI4.ID1.	PG&E will use the NRC-approved methodology in Westinghouse WCAP-11394-P-A for each fuel cycle to ensure the minimum departure from nucleate boiling ratio (DNBR) is maintained above the DNBR safety limit.	Notification 50200784	CLOSED – Commitment closed and implemented in the design of both cores in previous cycles and in Notification 50200784, Task 7.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
LAR	DCL-09-032	5/5/2009	10 CFR Part 26 TS changes per TSTF-511	No explicit number, tracked as a "one-time commitment" per XI4.ID1.	PG&E will perform removal of the plant-specific TS requirements concurrently with the implementation of the 10 CFR Part 26, Subpart I requirements. This commitment will be completed no later than 10/1/2009.	Notification 50043129 License Amendment 205 and 206	CLOSED – Commitment closed and implemented via TS implementation on 10/1/2009 as noted in Notification 50043129.
LAR	DCL 09-065	9/8/2009	Emergency Amendment Request to revise TS 3.7.1	No explicit number, tracked as a "one-time commitment" per XI4.ID1.	PG&E will calculate the required as-found and as-left tolerances in accordance with the guidance of Regulatory Issue Summary (RIS) 2006-17 prior to the adjustment of the Diablo Canyon Power Plant (DCPP) Unit 2 Maximum Allowable Power Range Neutron Flux High Setpoint from 87 percent to 106 percent during DCPP Unit 2 Cycle 15.	Notification 50265286 License Amendment 208 Calculation J-154 STP I-37-N41.A/B - STP I-37-N44.A/B ECG 38.3 Order 60019185-0010/0020/0030/0040 RIS 2006-17 TSTF-493 Rev 4	CLOSED – Commitment closed and implemented in STP I-37-N41A/B - 44A/B, ECG 38.3, and Notification 50265286.
LAR	DCL-10-018	2/24/2010	Revision to TS 3.8.1	No explicit number, tracked as a "one-time commitment" per XI4.ID1.	PG&E will provide additional guidance to operators in the surveillance procedures as part of implementation of the license amendment request to provide guidance to the operators on use of the new Note added to Surveillance Requirement (SR) 3.8.1.10 and SR 3.8.1.14.	Notification 50232181	CLOSED – Commitment deleted as DCL-10-018 was withdrawn voluntarily by the licensee as noted in Notification 50232181, Task 9.

ATTACHMENT 2

AUDIT SUMMARY - MANAGEMENT OF CHANGES TO

REGULATORY COMMITMENTS

OCTOBER 18-21, 2011

DIABLO CANYON POWER PLANT, UNITS 1 AND 2

AUDIT SUMMARY - MANAGEMENT OF CHANGES TO REGULATORY COMMITMENTS

OCTOBER 18-21, 2011

DIABLO CANYON POWER PLANT, UNITS 1 AND 2

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Original Description of Commitment	Revised Commitment	Supporting Documents	Change Status
GL	DCL-10-014 DCL-11-035	2/9/2010 3/17/2011	Response to Nuclear Regulatory Commission (NRC) Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	No explicit number, tracked as a "one-time commitment" per XI4.ID1.	Pacific Gas and Electric Company (PG&E) will install a vent at this high point on the residual heat removal (RHR) pump line during Unit 2 refueling outage sixteen (2R16).	PG&E will install a vent at this high point on the RHR line during Unit 2 Refueling Outage Eighteen (2R 18).	DCL-11-035	DISCREPANCIES NOTED – XI4.ID1 does not provide a mechanism for a "single task" or "one-time" commitment to enter XI4.ID2. Therefore, Attachment 1 and DCP Form 69-20200 of XI4.ID2 was not utilized as required by the Nuclear Energy Institute (NEI) 99-04 guidance to evaluate the notification or evaluation needed for this commitment change. No safety significance noted.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Original Description of Commitment	Revised Commitment	Supporting Documents	Change Status
GL	DCL-08-090	10/14/2008	Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	The 4 th commitment in the PG&E letter but has no programmatic number since tracked as a "one-time commitment" per XI4.ID1.	PG&E will replace air operated valves in the safety-injection (SI) test lines 2R15 with manual valves. An additional valve will also be added 1R16 in series in each test loop. These changes will provide a more reliable isolation for test lines, decreasing the probability of intersystem leakage which could result in gas intrusion. These modifications will be performed during 2R15 and 1R16.	The Unit 2 valves were replaced as delineated. For unit 1 during 1R16, only the air-operated valves were replaced (10 of the originally discussed 19 valves).	Notification 50037662	DISCREPANCIES NOTED – XI4.ID1 does not provide a mechanism for a "single task" or "one-time" commitment to enter XI4.ID2. Therefore, Attachment 1 and Diablo Canyon Power Plant (DCPP) Form 69-20200 of XI4.ID2 was not utilized as required by the NEI 99-04 guidance to evaluate the notification or evaluation needed for this commitment change. The licensee provided an engineering evaluation in the Notification and did call the NRC project manager (PM). No safety significance noted.
LAR	DCL-89-320	12/21/1989	"Diablo Canyon Units 1 and 2 Additional Information and Certification regarding License Amendment Request 88-05, revision of Technical Specification (TS) Sections 3.0 and 4.0 'Applicability' and Associated Bases (generic Letter 87-09)"	None provided	Mode Transition Checklists were revised due to provisions in Technical Specification (TS) 3.0.4 with review by the Plant Staff Review Committee.	The commitment remained the same with the exception of the TS reference for TS 3.0.4.b only	DCL-89-320	Form 69-20200 submitted and approved with no discrepancies noted.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Original Description of Commitment	Revised Commitment	Supporting Documents	Change Status
BL	DCL-03-008 DCL-03-151	1/31/2003 11/18/2003	Leakage From Reactor Pressure Vessel Lower Head Penetrations and Reactor Coolant Pressure Boundary Integrity"	None provided.	Bare metal inspection of reactor pressure vessel bottom heads.	Deleted due to updated ASME Code case N-722	ASME Section XI Code Case N-722 (73 FR 52730; 9/10/2008).	Form 69-20200 submitted and approved with no discrepancies noted.
LAR	DCL-81-302	3/2/1981	Containment recirculation sump and RHR pump suction piping debris inspection	T04781	The inspection of the containment recirculation sump and RHR pump suction piping to Valves 8982A an 8982B {shall be} conducted by representatives of the engineering department and verified by personnel with knowledge equal to that of the performer. The containment recirculation sump, the sump trash racks, screens, and RHR pump suction lines {shall be} inspected for debris. Any debris {shall be} removed from containment and recorded on the inspection sheet. This inspection {shall be} conducted at least once per 24 months, normally in conjunction with the inspection following refueling outages.	The inspection of the containment recirculation sump and RHR pump suction piping to Valves 8982A an 8982B {shall be} conducted by representatives of the engineering department and verified by personnel with knowledge equal to that of the performer. Sump plenum internals and RHR pump suction lines to Valves 8982A and 8982B will only be inspected if a plenum hatch seal is broken or if an initiating event as defined in Surveillance Test Procedure STP M-45A has occurred. Any debris {shall be} removed from containment and recorded on the inspection sheet. This inspection {shall be} conducted at least once per 24 months, normally in conjunction with the inspection following refueling outages.	Notification 0002152 DCP C-49S57	Form 69-20200 submitted and approved with no discrepancies noted.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Original Description of Commitment	Revised Commitment	Supporting Documents	Change Status
LER	LER 2-87-023-02 DCL 93-266	10/12/2000 (Procedure Commitment Database (PCD) update date)	Accumulator Nozzle cracking	T36157	As a result of Accumulator Nozzle Cracking found in the early 1990s, Nonconformance Report (NCR) DC2-91-TN-N075 CAPR #3 stated, "Revise the weekly containment inspection rounds sheets to examine all accessible nozzles and underskirt piping for evidence of boric acid crystals which could indicate a through-wall crack.	Revise the operations monthly inspection procedures to examine all accessible accumulator nozzles and underskirt piping for evidence of boric acid crystals that could indicate through wall cracks.	ONCR DC2-91-TN-N075 OP1.DC3 Notification 50375715, 50375714 STP I-1F	Form 69-20200 submitted and approved with no discrepancies noted. Licensee noted and corrected in 2000 that the original commitment was not properly logged in PCD.
LER	NRC Inspection Report 50-275/92-17 and 50-323/92-17. Non-conformance report N001627 (NCR DCO-92-MM-N007) DCL 92-068 LER 1-91-019-00 DCL-92-134 LER 1-91-019-01 DCL-92-161	7/9/1992 PCD update 11/11/2003 07/30/1992 PCD update 11/11/2003	Containment Fan Cooler Unit (CFCU) Backdraft Dampers Backdraft Damper Maintenance	T34927 T34928	The CFCU Surveillance Test Procedure (was) revised to specifically verify backdraft damper operability (DCL 92-068). STP M-93a, "CFCU Test," for backdraft dampers will be revised to adequately verify backdraft damper operability following CFCU maintenance (DCL 92-161). The post-maintenance testing procedure (was) revised to include steps to backdraft damper critical safety function. Procedures (were) developed for backdraft damper maintenance with appropriate QC hold points (DCL 92-068). Maintenance procedure (MP) M-23.8 is being developed to provide more specific instructions for CFCU backdraft damper maintenance (DCL 92-161).	DELETE - No commitments remain for the Unit 2 backdraft dampers.	STP M-93A MP M-23.8 DCP 1000000119 DCP 1000000108	Form 69-20200 submitted and approved with no discrepancies noted.

J. Conway

- 2 -

If you have any questions, please contact me at 301-415-1445 or via e-mail at alan.wang@nrc.gov.

Sincerely,

/RA/

Alan B. Wang, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

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