

**From:** [Polickoski, James](#)  
**To:** [Soenen, Philippe R](#)  
**Cc:** [Lent, Susan](#); [Baldwin, Thomas \(DCPP\)](#); [Burkhardt, Janet](#)  
**Subject:** RAI: Request for Additional Information in regards to Diablo Canyon Power Plant Relief Request RVFLNG-INT3 - U1 & U2 (TAC Nos. MF0408 and MF0409)  
**Date:** Friday, March 15, 2013 3:26:39 PM

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Mr. Soenen,

By letter dated December 20, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML12356A059), Pacific Gas and Electric Company (the licensee) requested relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Table IWB-2500-1 and Paragraph IWB-5222 at Diablo Canyon Power Plant (DCPP) Units 1 and 2. The licensee proposed to use the alternative, "Request Number RVFLNG-INT3 - U1 & U2," to the ASME Code, Section XI, pressure test requirements for inservice inspection (ISI) of Class 1 reactor vessel flange head leakoff lines for DCPP Units 1 and 2.

Based on a review of the submittal, the NRC staff has determined that the following additional information is required in order to complete its review. The request for additional information was discussed with Mr. Soenen on March 15, 2013. It was agreed that a response to these RAIs would be provided by May 3, 2013. Should the NRC determine that this RAI is no longer necessary prior to the scheduled date, the request will be withdrawn. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-5430 or via e-mail at [james.polickoski@nrc.gov](mailto:james.polickoski@nrc.gov). The NRC staff has determined that no security-related or proprietary information is contained herein.

Sincerely,  
Jim Polickoski

James T. Polickoski  
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REQUEST FOR ADDITIONAL INFORMATION  
REQUEST NUMBER RVFLNG-INT3 - U1 & U2  
PRESSURE TEST OF REACTOR VESSEL HEAD FLANGE LEAKOFF LINES  
DIABLO CANYON POWER PLANT UNITS 1 AND 2  
PACIFIC GAS AND ELECTRIC COMPANY  
DOCKET NUMBERS 50-275 AND 50-323  
(TAC NOS. MF0408 AND MF0409)

To complete its review, the NRC staff requests the following additional information:

1. Provide the following in regards to piping and configuration:
  - (1) Submit a piping and instrumentation diagram (P&ID) for the entire reactor vessel head flange leakoff system.
  - (2) Identify on the P&ID the pipe segments that are required to be examined in

accordance with the ASME Code, Section XI, Table IWB-2500-1, Examination Category B-P and Item Number B15.10.

(3) Identify on the P&ID the pipe segments that are accessible and inaccessible for inspection.

2. Provide the following in regards to leakage visual examination:

(1) For the accessible portion of the subject piping, describe exactly how the visual examination will be performed to identify the pipe through-wall leakage.

(2) If the pipe is insulated, discuss whether the insulation will be removed. If insulation will not be removed, discuss how the pipe would be examined to identify the potential pipe through-wall leakage.

(3) If the subject pipe is located in a high elevation or far away location from the examiner, describe how the potential pipe through-wall leakage can be identified.

(4) Discuss how the operator distinguishes a pipe through-wall leakage from various other leakage sources (e.g., bolted joint [flange] leakage, valve in-line leakage, and leakoff through the O-ring, etc.).

3. Provide the following:

(1) For the pipe segments that are inaccessible for inspection, discuss how the structural integrity of the inaccessible pipe segments will be demonstrated.

(2) Discuss the degradation history of the subject piping (e.g., wall thinning, cracking, etc.).

(3) Provide the material specification of the affected piping and associated welds.

(4) Provide the design pressure and wall thickness of the leakoff lines.

4. Provide the following related to normal operation:

(1) Describe the system alignment and configuration of the leakoff lines during normal operation (e.g., valve positions, alarm setpoints, etc.). Pictorial representations via the above requested P&IDs may be helpful.

(2) When leakage is detected via high temperature alarm initiation, discuss the procedures in response to that leakage in the O-ring leakoff line (e.g., describe the actions that would be taken after the alarm is initiated).

(3) If the leakoff line itself was degraded (leaking) and diverting leakoff, discuss how it would be determined if the leakoff line itself was leaking, once the above alarm actuated.