

NRR-PMDAPEm Resource

From: Lingam, Siva
Sent: Thursday, September 24, 2015 9:43 AM
To: Soenen, Philippe R (PNS3@pge.com)
Cc: Markley, Michael; McHale, John; Stevens, Gary; Schrader, Kenneth (KJSe@pge.com); 'mjrm@pge.com'
Subject: Diablo Canyon 1 and 2 - Acceptance Review of Relief Request (RR) NDE-SG-MS-IR, Main Steam Nozzle Inner Radius Examination (TAC Nos. MF6646 and MF6647)

By letter dated August 24, 2015 (Agencywide Documents Access and Management System Accession No. ML15236A376), Pacific Gas and Electric Company (PG&E, the licensee) submitted a relief request (RR) 1NDE-SG-MS-IR for Diablo Canyon Power Plant, Units 1 and 2. This RR associated with the impracticality of applying the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI volumetric examination requirements for inside radius examinations of Class 2 pressure retaining main steam nozzle in the replacement steam generators. The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this RR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and requested for the following clarification:

- The submittal requests relief under the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.55a(g)(5)(iv), "*ISI program update: Schedule for completing impracticality determinations.*" However, request for relief should be made under 10 CFR 50.55a(g)(5)(iii), "*ISI program update: Notification of impractical ISI Code requirements*" on a schedule consistent with 10 CFR 50.55a(g)(5)(iv). Clarify that this RR was submitted pursuant to 10 CFR 50.55a(g)(5)(iii) on a schedule consistent with 10 CFR 50.55a(g)(5)(iv).

During a telephone call on September 23, 2015, the licensee clarified that the relief request is under the provisions of 10 CFR 50.55a(g)(5)(iii). Therefore, we will review this submittal in accordance with the provisions of 10 CFR 50.55a(g)(6), "*Actions by the Commission for evaluating impractical and augmented ISI [inservice inspection] Code requirements.*" We will also include this clarification in our final safety evaluation.

Based on the above clarification, the NRC staff has concluded that the relief request does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed RR in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

If you have any questions, please contact me.

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Hearing Identifier: NRR_PMDA
Email Number: 2408

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Sent Date: 9/24/2015 9:43:00 AM
Received Date: 9/24/2015 9:43:00 AM
From: Lingam, Siva

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Files	Size	Date & Time
MESSAGE	3330	9/24/2015 9:43:00 AM

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