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 Document Control Branch (Document Control Desk)

SUBJECT: Responds to 870112 ltr re Use of ASME Code Case N-356,
 SNT-TC-1A, 1980 & NCIG-01, NCIG-03. Changes will be
 incorporated in next rev of FSAR Update, Chapter 17.

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

March 2, 1987

PGandE Letter No.: DCL-87-039

Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Proposed Revision to FSAR Update, Chapter 17

Gentlemen:

In response to the NRC Region V letter of January 12, 1987, PGandE provides the following:

a. Use of ASME Code Case N-356

NRC Region V Comment:

Code Case N-356 is not currently listed in any of the applicable Regulatory Guides as suitable for use by the Commission staff. Therefore, your request to make use of this code case cannot be approved by Region V. However, use of this code case has been approved on a case-by-case basis as in the authorization for use at the Clinton Power Station Unit 1. Your request for approval to use Code Case N-356 should be made to the Licensing Branch of NRR in accordance with 10 CFR 50.55a, footnote 6.

PGandE Response:

In accordance with your recommendation, we will direct our request for approval for use of ASME Code Case N-356 to the Office of Nuclear Reactor Regulation.

b. Use of SNT-TC-1A, 1980

NRC Region V Comment:

Your proposed request to use the 1980 Edition of SNT-TC-1A is authorized provided you make the requirements of this document

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mandatory rather than guidance. This would make your ISI program in compliance with the intent of ASME Section XI that "shall" is to be inserted in place of "should" in SNT-TC-1A 1980.

PGandE Response:

In accordance with your authorization, we will implement the 1980 edition of SNT-TC-1A as a mandatory requirement immediately. In addition, we will interpret "shall" in place of "should" in SNT-TC-1A, 1980, as requested, to comply with the intent of ASME Section XI. This change will be incorporated in the next revision of our FSAR Update, Chapter 17.

c. Use of NCIG-01 and NCIG-03

NRC Region V Comment:

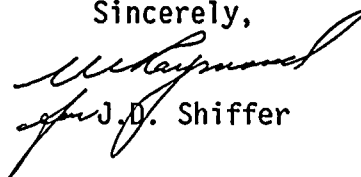
The NCIG-01 document for reinspection of structural welds was developed under two important premises. First, that it does not apply to fatigue loaded structures, and second, that the assumed design margins in fact are available at the adopting site. Also, NCIG-01 is not applicable to ASME structures or any work performed to your ASME Section XI Inservice Inspection Program. Therefore, we are requesting you provide us with additional information of your intended use of these NCIG documents; and what measures will be initiated (implementing instructions) to ensure that the NCIG documents are not misapplied to areas with fatigue loading considerations or areas with insufficient design margins.

PGandE Response:

This item is still under consideration and will be covered in a separate letter at a later date.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,


J.D. Shiffer

cc: L. J. Chandler
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