

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

June 24, 1997

Mr. Gregory M. Rueger Pacific Gas and Electric Company NPG - Mail Code A10D P. O. Box 770000 San Francisco, California 94177

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PDR

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ADDCK 05000275

PDR

SUBJECT: SAFETY EVALUATION OF RELIEF REQUESTS FOR PUMPS AND VALVES INSERVICE TESTING PROGRAM - DIABLO CANYON NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 (TAC NOS. M94391 AND M94392)

Dear Mr. Rueger:

By letter dated December 29, 1995, Pacific Gas and Electric Company submitted relief requests P-RR1, P-RR2, and V-RR12 for Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2, Second 10-year Interval Inspection Program Plan, for inservice testing of pumps and valves. The staff has completed its review of the proposed relief requests. The basis for the staff's conclusions are contained in the enclosed safety evaluation. The staff has determined that, with respect to Request for Relief P-RR2, the proposed alternative testing is authorized pursuant to 10 CFR 50.55a(a)(3)(ii), in that compliance would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. This alternative testing is authorized for a interim period of six months from the date of this letter. PG&E should provide the staff with a revised request indicating the actions taken and providing additional basis to raise the alert limit. The staff has determined that, with respect to Request for Relief V-RR12, the proposed alternative is unacceptable because it does not show the impracticability of testing quarterly and during cold shutdowns as required by OM-10, Paragraph 4.2.1.2. Therefore, Request for Relief V-RR12 is denied. The staff has determined that, with respect to Request for Relief P-RR1, the relief request does not have sufficient detail to justify the proposed alternative. Therefore. Request for Relief P-RR1 is denied.

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This submittal indicates weaknesses in the engineering organization in that in the case of V-RR12, there was an apparent lack of understanding of the requirements of OM-10, and in the case of P-RR1, there was less than a thorough argument presented to justify the request.

Sincerely,

Original Signed By

William H. Bateman, Director Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323 Enclosure: Safety Evaluation

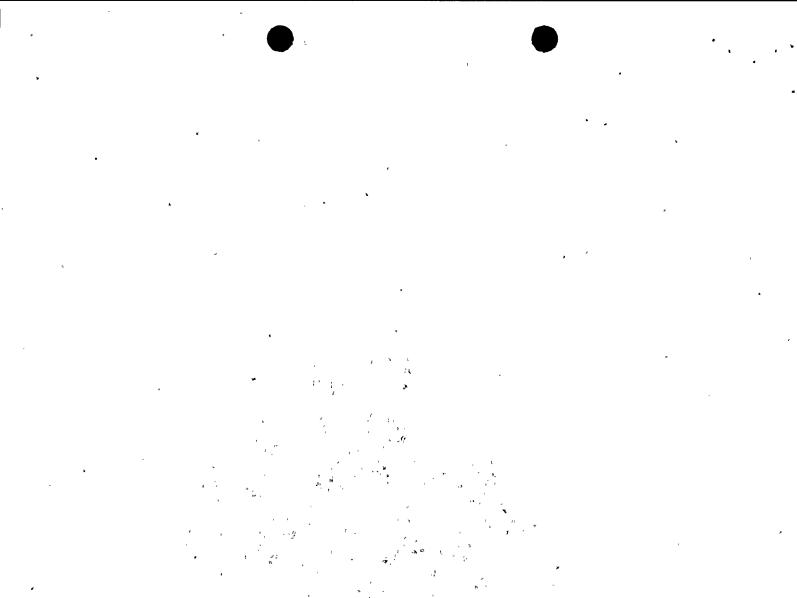
cc w/encl: See next page

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Mr. Gregory M. Rueger

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cc w/encl: NRC Resident Inspector Diablo Canyon Nuclear Power Plant c/o U.S. Nuclear Regulatory Commission P. O. Box 369 Avila Beach, California 93424 Dr. Richard Ferguson, Energy Chair Sierra Club California 1100 11th Street, Suite 311 Sacramento, California 95814 Ms. Nancy Culver San Luis Obispo Mothers for Peace P. O. Box 164 Pismo Beach, California 93448 Chairman San Luis Obispo County Board of Supervisors Room 370 **County Government Center** San Luis Obispo, California 93408 Mr. Truman Burns Mr. Robert Kinosian California Public Utilities Commission 505 Van Ness, Room 4102 San Francisco, California 94102 Mr. Steve Hsu Radiologic Health Branch State Department of Health Services Post Office Box 942732 Sacramento, California 94232 Diablo Canyon Independent Safety Committee ATTN: Robert R. Wellington, Esq. Legal Counsel 857 Cass Street, Suite D Monterey, California 93940

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