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50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
AUTH.NAME AUTHOR AFFILIATION
COOPER,W.E. Teledyne Engineering Services
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Clarifies 821007 statement re required sys,structures & components for plant operating modes for independent design verification program.

DISTRIBUTION CODE: D013S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
TITLE: Diablo Canyon (50-275) Independent Design Verification Program

NOTES:J Hanchett 1cy PDR Documents. 05000275
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	IE/DRP DIR		1	1	NRR/DE/CEB	12	1	1
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ACCESSION NBR:8210250591 DOC.DATE: 82/10/15 NOTARIZED: NO DOCKET #
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AUTH.NAME AUTHOR AFFILIATION
COOPER,W.E. Teledyne Engineering Services
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Clarifies 821007 statement re required sys, structures & components for plant operating modes for independent design verification program.

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TITLE: Diablo Canyon (50-275) Independent Design Verification Program

NOTES:J Hanchett 1cy PDR Documents. 05000275
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NOTES:		1	1			

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130 SECOND AVENUE
WALTHAM, MASSACHUSETTS 02254
(617) 890-3350 TWX (710) 324-7508

50-275

October 12, 1982
5511-169

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Mr. D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: DCNPP-IDVP: Clarification of Request for "Views" on Required Systems, Structures and Components for Plant Operating Modes

Ref: 1. NRC (Eisenhut) letter to TES (Cooper) of August 19, 1982.

2. NRC (Eisenhut) letter to PG&E (Maneatis) of August 19, 1982.

Dear Mr. Eisenhut:

This letter is in response to my statement at the October 7, 1982 PG&E-IDVP meeting, which some of your staff attended, that I would write you providing an interpretation of item 6 in Reference 1 and requesting your concurrence or clarification.

Reference 1 included the following item:

> We have requested PG&E to provide a list of systems, structures and components required for fuel loading and other modes of plant operation. We intend to provide this information to you for your consideration and request your views.

The request made to PG&E was in Reference 2 and was as follows:

> The schedule you discussed at the August 6 meeting was based, in part, on systems you deem to be required for fuel loading. Provide a detailed list of those safety-related systems, structures and components that in your opinion are required for fuel loading, criticality, low power testing and full power operation. Provide the bases for judging the sufficiency of each such list for each mode of operation.

PG&E has provided partial answers to you by their letters of August 24, 1982 and September 8, 1982. TES commented to PG&E on the first of these on September 7, 1982 and, as discussed at the October 7, 1982 meeting, RLCA has submitted a specific request for information to PG&E.

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The discussion of October 7, 1982 was directed at acquainting all present with our difficulty in interpreting your sentence "(We) intend to provide this information to you for your consideration and request your views." Although many possible interpretations were stated on October 7, 1982, including some very extreme possibilities, I will not try to repeat them here.

Based upon that discussion, it is our interpretation of your request that a proper response consistent with the approved Program Plan would be to include the following in the Interim Technical Report relative to fuel loading:

1. A judgement as to the validity of the PG&E corrective action program in general as determined by performing the work defined in ITR-8, the IDVP program for verification of the DCP Corrective Action Program.

2. Statements with respect to IDVP completion or concerns with respect to required specific systems, structures or components when such a statement can be made on the basis of our work at the time the ITR is written.

3. Identification of any additional work we plan for required specific systems, structures or components including a description of the work status and a definition of the work yet to be completed.

Each such IDVP judgement, statement, identification, or description would be based upon our existing scope of work. Each would be referenced to a previously issued ITR or, when an ITR has not been issued, would be based upon information in the ITR on fuel loading. In performing our work between the present date and the date at which PG&E requests us to prepare an ITR relative to fuel loading, we expect to complete our audit of the implementation of the Diablo Canyon Project QA Program and to place priority upon our verification of the systems, structures, and components identified by PG&E as required for fuel loading. This plan is explained in our ITR-8, the IDVP program for verification of the DCP Corrective Action Program.

This approach requires that PG&E retain full responsibility for identifying those systems, structures, and components required and for demonstrating to the NRC that their selection was proper. We would not object to providing comments upon PG&E's selection, similar to those of our September 7th letter. However, our detailed knowledge of the DCNPP systems and operation and of the NRC requirements are not sufficient for us to perform an authoritative role in judging the acceptability of the PG&E selections with respect to system requirements.

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I hope that this interpretation is consistent with your intent. If it is, or if you have a different viewpoint, I would appreciate knowing at an early date.

Very truly yours,

TELEDYNE ENGINEERING SERVICES

W. E. Cooper

William E. Cooper
Project Manager - 5511

WEC:cjr

cc: R.H. Engelken (NRC)
H.E. Schierling (NRC)
G.A. Maneatis (PG&E)
R.R. Fray (PG&E)
E. Denison (RLCA)
F. Sestak (SWEC)
R.F. Reedy (RFR)

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MEETING ANNOUNCEMENT

DEPARTMENT DCNPP-IDVP BY M.A. Revett/TES MAR

SUBJECT: EOI-8001 thru 8006

LOCATION: Stone & Webster Engineering Corp.
245 Summer Street
Boston, MA 02107 ROOM: To be Determined

DATE: October 21, 1982 TIME: 0900

ORGANIZATION Teledyne Engineering Services

AGENDA: Discussion of Subject EOI's

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ATTENDANCE REQUESTED: TES, SWEC, DCP