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HOWARD V. GOLUB
GLENN WEST, JR.
ANUITANT GISTAL COURSE.

77 BEALE STREET, SAN FRANCISCO, CALIFORNIA 94106
P.O. BOX 7442, SAN FRANCISCO, CALIFORNIA 94120

*ELEPHONE (415) 781-4211 *ELECOPIER (415) 543-7813

DIMERT L. HARRICE
DAN BRAVEDN LUBBOCK
ROBERT L. BORDON
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SNILEV A. SANDERBON
SNILEV A. SANDERBON
KENNETV YAND

April 6, 1983

Mr. John B. Martin, Regional Administrator U.S. Nuclear Regulatory Commission, Region V 1450 Maria Lane, Suite 210 Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76

Docket No. 50-323

Diablo Canyon Units 1 and 2

Degradation of Threaded Fasteners - Item 1 of IEB 82-02

Dear Mr. Martin:

PGandE's letter to Mr. R. H. Engelken dated August 2, 1982 provided the required response for item 3 of IE Bulletin 82-02.

A meaningful response to item 2 of the Bulletin can only be provided after at least one cycle of experience has been accumulated at Diablo Canyon. Since this is estimated to be about mid-1985, PGandE is submitting the response to item 1 at this time so as to be within a time frame consistent with other operating plants (i.e., within a few months of the publication of the Bulletin).

IE Bulletin 82-02 item 1 requires that:

"Where procedures do not exist, develop and implement maintenance procedures for threaded fastener practices. These procedures should include but not [be] limited to the following: (1) maintenance crew training of proper bolting/stud practices, tools application, specifications and requirements, (2) detensioning and retensioning practices (torque iteration), specified tolerances and other controls for disassembly and reassembly of component closure/seal connections, (3) gasket installation and controls, and (4) retensioning methods and other measures to eliminate reactor coolant leakage during operations."

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PGandE has developed and put into effect procedures which, as a minimum, cover the requirements of the Bulletin. More specifically:

- 1) As part of the maintenance training program, training is conducted at least annually for mechanical maintenance personnel on proper bolting techniques and sealing materials. This training is based on the content and application of the installation and maintenance procedures for gaskets and bolting in the reactor coolant pressure boundary.
- A maintenance procedure was developed to explicitly cover the bolted connections in the reactor coolant pressure boundary. The manufacturer's recommendations were incorporated where appropriate and controls established to ensure that bolt torque requirements were met. In addition, a review of the bolting materials used in the pressure boundary was conducted and the list was included in the procedure to ensure that the proper material is used in replacements.
- 3) Gasket installation is specified in a separate maintenance procedure titled "Spiral Wound (Flex) Gasket Replacement Guide". This procedure is adequate for controlling the installation of gaskets in the reactor coolant pressure boundary.
- 4) It is the present intention of plant maintenance not to attempt to retension or otherwise seal a leaking joint while at power operation. Should coolant leakage approach the limits requiring shutdown, it is PGandE's intent to shutdown the Plant to repair the leaking joints. This philosophy will be reevaluated depending on economics and operating experience. Procedures for sealing leaking joints during power operation will be developed if judged prudent or necessary.

Approximately 150 man-hours were required to research and prepare this response.

Subscribed to in San Francisco, California, this 6th day of April, 1983.

Respectfully submitted,

Pacific Gas and Electric Company

Schuyler

Vice President

Nuclear Power Generation

Robert Ohlbach Philip A. Crane, Jr.

Richard F. Locke

Attorneys for Pacific

Gas and/Electric Company

Subscribed and sworn to before me this 6th day of April, 1983

T. Neal Madison

C. T. Neal Madison, Notary Public in and for the City and County of San Francisco, State of California

My Commission expires December 27, 1985

C. T. NEAL MADISON PURIC - CALIFORNIA SAN FRANCISCO My Commission Expires Dec. 27, 1985

cc:

Service List