



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 12, 1999

Mr. Gregory M. Rueger
Senior Vice President and General Manager
Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant
P. O. Box 3
Avila Beach, CA 94177

SUBJECT: GENERIC LETTER 97-01, "DEGRADATION OF CRDM/CEDM NOZZLE AND OTHER VESSEL CLOSURE HEAD PENETRATIONS" - REVIEW OF THE RESPONSES FOR THE DIABLO CANYON POWER PLANT, UNIT NOS. 1 AND 2 (TAC NOS. M98562 AND M98563)

Dear Mr. Rueger:

Enclosed is the NRC staff's assessment of your letters of April 28, 1997, and July 28, 1997, which provided your 30-day and 120-day responses to Generic Letter (GL) 97-01, "Degradation of CRDM/CEDM Nozzle and Other Vessel Closure Head Penetrations," and your letter of December 29, 1998, which provided your response to the staff's request for additional information (RAI) dated September 30, 1998, relative to the issuance of the GL. Your responses provided your proposed program and efforts to address the potential for primary water stress corrosion cracking (PWSCC) to occur in the control rod drive mechanism (CRDM) nozzles at the Diablo Canyon Power Plant, Unit Nos. 1 and 2 (DCPP).

On April 1, 1997, the staff issued GL 97-01, "Degradation of CRDM/CEDM Nozzle and Other Vessel Closure Head Penetrations," to the industry requesting that addressees provide a description of the plans to inspect the vessel head penetrations (VHPs) at their respective pressurized water reactor (PWR) designed plants. In the discussion section of the GL, the staff indicated that it did not object to individual PWR licensees basing their inspection activities on an integrated, industry-wide inspection program.

The Westinghouse Owners Group (WOG), in coordination with the efforts of the Nuclear Energy Institute (NEI) and the other PWR Owners Groups (the Babcock and Wilcox Owners Group [B&WOG] and Combustion Engineering Owners Group [CEOG]), determined that it was appropriate for its members to develop a cooperative integrated inspection program in response to GL 97-01. Therefore, on July 25, 1997, the WOG submitted two topical reports, WCAP-14901, Revision 0, and WCAP-14902, Revision 0, on behalf of the member utilities in the WOG. In these reports, the WOG provided descriptions of the two models, the EPRI/Dominion Engineering CIRSE model (crack initiation and growth susceptibility model) and the Westinghouse model, that were being used to rank the VHPs at the participating plants in the owners group. You provided your 30-day and 120-day responses for the Diablo Canyon Power Plant, Unit Nos. 1 and 2 on April 28, 1997, and July 28, 1997. In these responses, you indicated that you were a participant in the WOG's integrated program for evaluating the potential for PWSCC to occur in the VHPs of Westinghouse designed PWRs, and that you were endorsing the probabilistic susceptibility model in WCAP-14901, Revision 0, as being applicable to the assessment of VHPs at DCPP.

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The staff performed a review of your responses of April 28, 1997 and July 28, 1997. It was determined by the appropriate WCAP facility, that some additional information was needed for completion of the review. Therefore, on September 30, 1998, the staff issued an RAI requesting: (1) a description of the probabilistic susceptibility ranking for a plant's VHPs to undergo PWSCC relative to the rankings for the rest of the industry; (2) a description of how the respective susceptibility models were benchmarked; (3) a description of how the variability in the product forms, material specifications and heat treatments used to fabricate a plant's VHPs were addressed in the susceptibility models; and (4) a description of how the models would be refined in the future to include plant-specific inspection results. As was the case for the earlier responses to the GL, the staff encouraged a coordinated, generic response to the requests in the RAI.

On December 11, 1998, NEI submitted a generic, integrated response to the RAIs on GL 97-01 on behalf of the PWR-industry and the utility members in the owners groups. In the generic submittal, NEI informed the staff that it normalized the susceptibility rankings for the industry. The generic response to the RAIs also provided sufficient information to answer the information requests in the RAIs, and emphasized that the integrated program is an ongoing program that will be implemented in conjunction with EPRI, the PWR Owners Groups, the participating utilities, and the Material Reliability Projects' Subcommittee on Alloy 600. By letter dated March 21, 1999, the staff informed NEI that the integrated program was an acceptable approach for addressing the potential for PWSCC to occur in the VHPs of PWR-designed nuclear plants, and that licensees responding to the GL could refer to the integrated program as a basis for assessing the postulated occurrence of PWSCC in PWR-design VHPs.

To date, all utilities have implemented VT-2 type visual examinations of their VHPs in compliance with the ASME requirements specified in Table IWB-2500 for Category B-P components. Most utilities, if not all, have also performed visual examinations as part of plant-specific boric acid wastage surveillance programs. In addition, the following plants have completed voluntary, comprehensive augmented volumetric inspections (eddy current examinations or ultrasonic testing examinations) of their CRDM nozzles:

- 1994 - Point Beach Unit 1 (Westinghouse design)
- 1994 - Oconee Unit 2 (B&W design)
- 1994 - D.C. Cook Unit 2 (Westinghouse design)
- 1996 - North Anna Unit 1 (Westinghouse design)
- 1998 - Millstone Unit 2 (CE design)
- 1999 - Ginna (Westinghouse design)

In addition, the following plants have completed voluntary, limited augmented volumetric inspections of their VHPs as well:

- 1995 - Palisades - eight instrument nozzles (CE design)
- 1996 - Oconee Unit 2 - reinspection of two CRDM nozzles (B&W design)
- 1997 - Calvert Cliffs Unit 2 - vessel head vent pipe (CE design)

The majority of these plants have been ranked as having the more susceptible VHPs in the industry. Of these inspections, only the inspections at D.C. Cook Unit 2 have resulted in the identification of any domestic PWSCC type flaw indications. The current program includes

additional commitments to perform further volumetric inspections of the CRDM nozzles at Oconee Unit 2 (a reinspection of 2-12 nozzles in 1999), Crystal River 3 (in 2001, B&W design), Diablo Canyon Unit 2 (in 1999, Westinghouse design), Farley Unit 2 (in 2001, Westinghouse design), and San Onofre Unit 3 (in 2002-2008, CE design). These plants are currently ranked in either the high or moderate susceptibility categories.

On December 29, 1998, you provided your response to the staff's RAI of September 30, 1998. In your letter of December 29, 1998, you endorsed the NEI submittal of December 11, 1998, and indicated that you were a participant in the NEI/WOG integrated program. The additional voluntary volumetric inspections performed to date have confirmed that PWSCC is not an immediate safety concern with respect to the structural integrity of VHPs in domestic PWRs, and since we have approved the integrated program for implementation, we conclude that the integrated program provides an acceptable basis for evaluating your VHPs. You may refer to the integrated program when submitting VHP-related licensing action submittals for the remainder of the current 40-year licensing period. However, if you are considering applying for license renewal for DCP, your application will need to address the following items: (1) an assessment of the susceptibility of your VHPs to develop PWSCC during the extended license terms for DCP; (2) a confirmation that the VHPs at DCP are included under the scope of your boric acid corrosion inspection program, and (3) a summary of the results of any inspections that have been completed on your VHPs prior to the license renewal application, as appropriate.

This completes the staff's efforts relative to your responses to GL 97-01. Thank you for your consideration and efforts in addressing this issue.

Sincerely,

Original Signed By:
 Steven D. Bloom, Project Manager, Section 2
 Project Directorate IV & Decommissioning
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation

Docket Nos. 50-275
 and 50-323

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additional commitments to perform further volumetric inspections of the CRDM nozzles at Oconee Unit 2 (a reinspection of 2-12 nozzles in 1999), Crystal River 3 (in 2001, B&W design), Diablo Canyon Unit 2 (in 1999, Westinghouse design), Farley Unit 2 (in 2001, Westinghouse design), and San Onofre Unit 3 (in 2002-2008, CE design). These plants are currently ranked in either the high or moderate susceptibility categories.

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Diablo Canyon Power Plant, Units 1 and 2

cc:

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

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavillion
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Christopher J. Warner, Esq.
Pacific Gas & Electric Company
Post Office Box 7442
San Francisco, California 94120

Mr. David H. Oatley, Vice President
Diablo Canyon Operations and
Plant Manager
Diablo Canyon Nuclear Power Plant
P.O. Box 3
Avila Beach, California 93424

Telegram-Tribune
ATTN: Managing Editor
1321 Johnson Avenue
P.O. Box 112
San Luis Obispo, California 93406