



**Pacific Gas and
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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 2
Inservice Inspection Relief Requests for Unit 2 Ninth Refueling Outage Weld
Examination Limitations

Dear Commissioners and Staff:

Pursuant to 10 CFR 50.55a(g)(5)(iii), enclosed are Inservice Inspection (ISI) Relief Requests #NDE-13.2R9, #NDE-15.2R9, and #NDE-33.2R9 regarding ISI weld examination limitations identified during the Unit 2 ninth refueling outage.

PG&E requests that the NRC approve these relief requests prior to the Unit 2 tenth refueling outage, which is currently scheduled to begin May 6, 2001.

Sincerely,

Lawrence F. Womack

cc: Steven D. Bloom
Ellis W. Merschoff
David L. Proulx
State of California
Diablo Distribution

Enclosures

DDM/469/A0485630

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INSERVICE INSPECTION (ISI) RELIEF REQUEST #NDE-13.2R9

System/Component for Which Relief is Requested

Class 1 systems, circumferential pipe welds.

ASME Section XI Code Requirements

1989 Edition, Table IWB-2500-1, Category B-J, item B9.21, requires that selected circumferential pipe welds smaller than NPS 4 be examined once during the interval. Essentially, 100 percent of the pipe weld is required to be examined using surface methods as shown in Figure IWB-2500-8, with acceptance standard IWB-3514.

Code Requirement from Which Relief is Requested

Relief is requested from performing a portion of the surface examination of certain pipe welds where access is limited by surface obstructions.

Basis for Relief Request

Design of the pipe welds limits access for surface examination due to Code identification bands or pipe supports welded to the pipe. Redesign and modification of the support or removal of the Code identification plate would be required to provide additional access. Accessible portions of each weld surface, based on examinations conducted during the Unit 2 ninth refueling outage(2R9), are described below:

<u>Unit 2 Weld</u>	<u>Line</u>	<u>NPS</u>	<u>Limitation</u>	<u>%Accessible</u>
WIB-408	1171	3	Code ID plate	88%

INSERVICE INSPECTION (ISI) RELIEF REQUEST #NDE-13.2R9

Proposed Alternative

All accessible areas of the circumferential pipe welds were completely examined as required, using liquid penetrant examination methods and visual examination is conducted during pressure test per Code Category B-P.

Justification for Granting of Relief

The pipe weld designs limit full surface examination due to the welded support or Code ID plate obstructions. Surface examination was performed on the entire accessible examination area and visual examination is conducted as required by Code Category B-P. This partial surface exam combined with the visual examinations provide continued assurance of the welds integrity. The redesign and modification necessary to provide further access is impractical in accordance with 10 CFR 50.55a(g)(5)(iii).

Implementation Schedule

This relief request will be implemented during the Unit 2 second ISI interval.

This request is based on examinations conducted 2R9.

INSERVICE INSPECTION (ISI) RELIEF REQUEST #NDE-15.2R9

System/Component for Which Relief is Requested

Class 1 pipe socket welds.

ASME Section XI Code Requirements

1989 Edition, Table IWB-2500-1, Category B-J, item B9.40 requires that selected socket welds larger than NPS 1 be examined once during the interval. Essentially 100 percent of each scheduled socket weld is required to be examined using surface methods as shown in Figure IWB-2500-8, with acceptance standard IWB-3514.

Code Requirement from Which Relief is Requested

Relief is requested from performing a portion of the surface examination of certain socket welds where access is limited by adjacent structure.

Basis for Relief Request

Design of certain socket welds limits access for surface examination due to the presence of physical obstructions such as welded supports, Code nameplates, adjacent piping, or structures. These conditions or combination of conditions may physically prevent access to portions of the required examination area. Accessible portions of each weld surface, based on examinations conducted during the 2R9 refueling outage, are described below:

<u>Unit 2 Weld</u>	<u>Line</u>	<u>NPS</u>	<u>Limitation</u>	<u>%Accessible</u>
WIB-870A	56	2	Pipe flange and bolting	81%

INSERVICE INSPECTION (ISI) RELIEF REQUEST #NDE-15.2R9

Proposed Alternative

All accessible areas of the pipe socket welds were completely examined as required, using liquid penetrant examination methods and visual examination is conducted during pressure test per Code Category B-P.

Justification for Granting of Relief

The design of the access provisions for the welds listed above limit full surface examination of the welds. Surface examination was performed on the entire accessible examination area and visual examination is conducted as required by Code Category B-P. This partial surface exam combined with the visual examinations provide continued assurance of the welds integrity. The redesign and modification necessary to provide further access is impractical in accordance with 10 CFR 50.55a(g)(5)(iii).

Implementation Schedule

This relief request will be implemented during the Unit 2 second ISI interval.

This request is based on examinations conducted during the Unit 2 ninth refueling outage.

INSERVICE INSPECTION (ISI) RELIEF REQUEST #NDE-33.2R9

System/Component for Which Relief is Requested

Class 2 systems, circumferential pipe welds in containment spray lines.

ASME Section XI Code Requirements

None. NRC requires that selected circumferential pipe welds in the containment spray system (NPS 8, Schedule 10S) be examined once during the interval. Essentially, 100 percent of the pipe weld is required to be examined using volumetric methods, with acceptance standard of IWC-3514.

NRC Requirement from Which Relief is Requested

Relief is requested from performing a portion of the volumetric examination of certain containment spray pipe welds where access is limited by surface configuration.

Basis for Relief Request

Design of the pipe welds limits access for volumetric examination due to the as-welded crown reinforcement surface condition which limit circumferential scans from the weld crown. Grinding the weld crown of these thin wall welds would be required to provide additional access, which could unacceptably reduce the minimum wall thickness. Accessible portions of each weld volume, based on examinations conducted during the Unit 2 ninth refueling outage (2R9), are described below:

<u>Unit 2 Weld</u>	<u>Line</u>	<u>NPS</u>	<u>Limitation</u>	<u>%Accessible</u>
WIC-264A	264	8	Weld crown contour	85%
WIC-264B	264	8	Weld crown contour	85%

INSERVICE INSPECTION (ISI) RELIEF REQUEST #NDE-33.2R9

Proposed Alternative

All accessible areas of the containment spray pipe welds were completely examined as required, using ultrasonic volumetric examination methods and visual examination is conducted during pressure test per Code Category C-H.

Justification for Granting of Relief

The pipe weld designs limit full volumetric examination due to the weld crown reinforcement which limits circumferential scans from the weld surface. Volumetric examination was performed on the entire accessible examination area and visual examination is conducted as required by Code Category C-H. This partial volumetric exam combined with the visual examinations provide continued assurance of the welds integrity. The redesign and modification necessary to provide further access is impractical in accordance with 10 CFR 50.55a(g)(5)(iii).

Implementation Schedule

This relief request will be implemented during the Unit 2 second ISI interval.

This request is based on examinations conducted during 2R9.