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June 18, 2015

PG&E Letter DCL-15-075

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

10 CFR 50.55a

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Power Plant Unit 1 and Unit 2  
Relief Request REP-SI – Supplement

References:

1. PG&E Letter DCL-14-060, "ASME Section XI Inservice Inspection Program Request for Alternative REP-SI: Proposed Alternative to Requirements for Repair/Replacement Activities for Certain Safety Injection Pump Welded Attachments," dated July 21, 2014 (ML14202A613)
2. NRC Letter, "Diablo Canyon Power Plant, Units 1 and 2 – Inservice Inspection Program Request for Alternative REP-SI: Proposed Alternative to Requirements for Repair and Replacement Activities for Certain Safety Injection Pump Welded Attachments (TAC Nos. MF4476 and MF4477)," dated December 23, 2014
3. PG&E Letter DCL-15-021, "Response to NRC Request for Additional Information Regarding Relief Request REP-SI," dated February 5, 2015 (ML15036A606)
4. PG&E Letter DCL-15-038, "Response to NRC Request for Additional Information Regarding Relief Request REP-SI – Part 2," dated March 30, 2015 (ML15089A594)
5. Teleconference with NRC, "Diablo Canyon RR REP-SI, SI Pump Welded Attachments - Discussion of Making Commitments versus Alternative Requests (TAC Nos. MF4476 and MF4477)," dated June 4, 2015

Dear Commissioners and Staff:

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted a Relief



Request for alternative REP-SI for Diablo Canyon Power Plant Units 1 and 2 for NRC approval.

In Reference 2, the NRC Staff provided a request for additional information (RAI) via letter dated December 23, 2014. In References 3 and 4, PG&E submitted responses to the RAI. In addition, PG&E submitted Revision 2 of the Relief Request for NRC approval, in Reference 4.

On June 4, 2015, PG&E discussed with NRC Staff (Reference 5), revising Section 5.6, "Commitments for Visual Examination and Nondestructive Examination," of the proposed Relief Request from Reference 4. A revised Section 5.6, "Proposed Alternative Visual and Nondestructive Examinations," converts the previously proposed regulatory commitments into proposed alternative examinations. The proposed revision also makes it clear that approval for proposed alternatives is being requested. The revised version of Section 5.6 is included in the Enclosure to this letter.

This communication does not contain regulatory commitments (as defined by NEI 99-04).

If you have any questions or require additional information, please contact Mr. Hossein Hamzehee at (805) 545-4720.

Sincerely,

Barry S. Allen  
*Vice President, Nuclear Services*

rnrt/4231/50600119

Enclosure

cc: Diablo Distribution  
cc/enc: Marc L. Dapas, NRC Region IV Administrator  
Thomas R. Hipschman, NRC Senior Resident Inspector  
Siva P. Lingam, NRC Project Manager  
Gonzalo L. Perez, Branch Chief, California Department of Public Health  
State of California, Pressure Vessel Unit



**Revised Section 5.6 of Relief Request REP-SI, Revision 2**

**Proposed Alternative  
In Accordance with 10 CFR 50.55a(z)(2)**

-Compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety-

Reference:

1. PG&E Letter DCL-15-038, "Response to NRC Request for Additional Information Regarding Relief Request REP-SI – Part 2," dated March 30, 2015 (ML15089A594)

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted, "Relief Request REP-SI, Revision 2," for NRC approval. Section 5.6 of the Relief Request has been revised to make it clear that approval for proposed alternatives is being requested. The revised Section 5.6, "Proposed Alternative Visual and Nondestructive Examinations," that is presented in this Enclosure replaces the previous Section 5.6, "Commitments for Visual Examination and Nondestructive Examination," in Reference 1, in its entirety.

**5.6 Proposed Alternative Visual and Nondestructive Examinations**

To provide continued assurance of the integrity of the affected safety injection (SI) pump welds, the following alternative surveillance tests and nondestructive examinations (NDE) are proposed.

**5.6.1 Alternative Visual Examinations for Leakage**

Surveillance test procedures (STPs) for quarterly testing of SI pumps 1-1, 1-2, and 2-1 will be revised (within 90 days after NRC approval) to require the test performer to visually examine the subject vent and drain connections for evidence of external leakage during all future tests. Leakage at these locations would be readily detectable due to accumulation of boric acid crystals at the leak site.

**5.6.2 Alternative Periodic Surface Nondestructive Examinations**

Liquid penetrant examinations conducted in December 2013 demonstrated absence of pre-existing outer-diameter (OD) surface flaws in support of the OD flaw growth analysis. The Inservice Inspection (ISI) Program Plan for the fourth ISI Interval is being prepared to require NDE

surface examination (liquid penetrant method) of the SI pump vent and drain connection welds where the carbon content of the 410SS base metal exceeds 0.08 percent or is not measurable due to insufficient access for Arc-Met testing. The alternative liquid penetrant examinations will be performed on an ISI periodic basis (once every 40 months), with the interval starting May 7, 2015, for Unit 1 and March 13, 2016, for Unit 2. The alternative liquid penetrant NDE examinations on an ISI periodic basis will provide continued assurance that no flaws exist at these locations. These alternative examinations will be included in all future ISI interval Program Plans for the subject pumps.