



Pacific Gas and
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PG&E Letter DCL-15-108

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 PRS-3 – Supplement

References:

1. PG&E Letter DCL-15-086, "ASME Section XI Inservice Inspection Program Request for Relief PRS-3: Class 1 Piping Vent, Drain, and Test Isolation Devices," dated July 28, 2015
2. Teleconference with NRC, "Diablo Canyon Relief Request PRS-3: Class 1 Piping Vent, Drain, and Test Isolation Devices, Timeliness of Submittal," dated September 8, 2015

Dear Commissioners and Staff:

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted Relief Request PRS-3 for Diablo Canyon Power Plant Units 1 and 2 for NRC approval.

On September 8, 2015, PG&E discussed with NRC Staff (Reference 2) timeliness of the submittal and revising Section 2, "Applicable Code Edition and Addenda," and Section 6, "Duration of Proposed Alternative," of the proposed relief request in Reference 1 to clarify that the third interval end date for Unit 1 is being extended to November 6, 2015, to include the Unit 1 nineteenth refueling outage (1R19), as allowed by ASME Code Section XI paragraph IWA-2430(d). The revised version of Sections 2 and 6 are included in the Enclosure to this letter.

PG&E requests expedited approval of the Relief Request PRS-3 by October 15, 2015, as the Unit 1 third inspection interval is scheduled to end on November 6, 2015, at the end of 1R19. The need for expedited approval was also discussed with NRC Staff (Reference 2). This communication does not contain any new or revised 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,

A handwritten signature in dark ink that reads 'Barry S. Allen'.

Barry S. Allen
Vice President, Nuclear Services

rnnt/4231/50033145

Enclosure

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

Revised Sections 2 and 6 of Relief Request PRS-3

**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-15-086, "ASME Section XI Inservice Inspection Program Request for Relief PRS-3: Class 1 Piping Vent, Drain, and Test Isolation Devices," dated July 28, 2015

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted Relief Request PRS-3 for NRC approval. Sections 2 and 6 of the Relief Request have been revised to clarify that the third interval for Unit 1 is being extended through the Unit 1 nineteenth refueling outage (1R19) until November 6, 2015. The revised Section 2, "Applicable Code Edition and Addenda," and Section 6, "Duration of Proposed Alternative," that are presented in this Enclosure replace the previous Section 2 and Section 6 in Reference 1, in their entirety.

2. Applicable Code Edition and Addenda

The Diablo Canyon Power Plant (DCPP) third Inservice Inspection Interval Program Plan (ISIPP) is based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 2001 Edition with Addenda through 2003.

The DCPP Unit 1 third inspection interval nominally commenced on January 1, 2006, and nominally would have ended on May 6, 2015, but is being extended through November 6, 2015 to include the Unit 1 nineteenth refueling outage (1R19) in which the subject inspections are scheduled in accordance with ASME Section XI paragraph IWA-2430(d). The DCPP Unit 2 third inspection interval nominally commenced on July 1, 2006, and is nominally scheduled to end on March 12, 2016. Actual end dates of the intervals are dependent on the completion dates of the 19th refueling outages for each unit, in accordance with ASME Section XI, paragraph IWA 2430(d)(1).

6. Duration of Proposed Alternative

Relief is requested for the remainder of the DCPP Unit 1 and Unit 2 third inservice inspection (ISI) intervals. The DCPP Unit 1 third inspection interval

nominally would have ended on May 6, 2015, but is being extended through November 6, 2015 to include the Unit 1 nineteenth refueling outage (1R19) as provided in ASME Section XI paragraph IWA-2430(d). The DCP Unit 2 third inspection interval is nominally scheduled to end on March 12, 2016. Actual end dates of the interval are dependent on the completion dates of the 19th refueling outages for each unit, in accordance with ASME Section XI, paragraph IWA-2430(d)(1).