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Subject: [External_Sender] Diablo Canyon Unit 1 AFW system piping
Date: Wednesday, August 26, 2020 12:18:30 PM
Attachments: [20200826-dc-lochbaum-evaluation-unit-1-afw-piping.pdf](#)

Hello Sam:

Attached is my evaluation of the potential piping degradation of the AFW system at Diablo Canyon Unit 1.

I found that the NRC has been asked four times prior to PG&E's recent request to extend the 72-hour LCO for one AFW train inoperable.

I hope it's still true, but the NRC has never granted relief from the 72-hour limit unless an AFW train was declared inoperable. In 2010, NRC denied Entergy's exigent LAR to extend the LCO for AFW Pump 32 from 72 hours to 106 hours. The NRC denied the request on grounds that AFW pump 32 was stated to remain operable by Entergy, thus removing the need for an urgent NRC relief from the non-applicable 572-hour limit.

To the best of my awareness, PG&E has not declared any AFW train on Unit 1 to be inoperable. If so, none of the NRC's relief options should be used. Instead, PG&E and follow Entergy's example by submitting a regular license amendment request with all the attendant public notifications.

Thanks,
Dave Lochbaum