



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

January 05, 2023

Paula A. Gerfen
Senior Vice President, Generation
and Chief Nuclear Officer
Pacific Gas and Electric Company
P.O. Box 56
Mail Code 104/6
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF
COMMERCIAL GRADE DEDICATION INSPECTION (05000275/2023010 AND
05000323/2023010) AND REQUEST FOR INFORMATION

Dear Paula A. Gerfen:

The purpose of this letter is to notify you that U.S. Nuclear Regulatory Commission (NRC) staff will conduct the commercial grade dedication baseline inspection at Diablo Canyon Power Plant, Units 1 and 2, beginning on March 27, 2023. The inspection team will be composed of three personnel from the NRC Region IV office. The inspection will be conducted in accordance with NRC inspection procedure (IP) 71111.21N.03, "Commercial Grade Dedication," dated June 28, 2022.

The inspection will evaluate the implementation of Diablo Canyon Power Plant's process for dedicating commercial-grade items, as required in applicable portions of Appendix B to Title 10 of the *Code of Federal Regulations* Part 50, to ensure reasonable assurance is provided that these items will perform their intended safety function. Additionally, this inspection will evaluate implementation of Diablo Canyon Power Plant's procurement process for safety-related structures, systems, and components, as required in Appendix B.

The inspection will include an onsite information gathering visit by the team lead and two weeks of onsite inspection by the team. The schedule for the inspection is as follows:

- Onsite Information Gathering Visit: February 27 – March 2, 2023
- Offsite Preparation Week: March 20 - 24, 2023
- Onsite Inspection Weeks: March 27 - 30, 2023, and April 10 - 13, 2023

The purpose of the information gathering visit is to meet with your staff to become familiar with the process for dedicating commercial-grade items and the process for procuring safety-related structures, systems, and components at Diablo Canyon Power Plant. This visit may include a tour of onsite commercial-grade item dedication facilities, receipt inspection facilities, storage facilities, and installed plant components associated with potential inspection samples. During the visit, the team lead will also review the information provided in the initial information request

to select a list of potential inspection samples. The team lead may also identify other information needed to support the inspection during this visit.

To minimize the impact on your staff and to ensure an effective and efficient inspection, we have enclosed two separate requests for information needed prior to the onsite information gathering visit and offsite inspection preparation week. The first request (Enclosure 1) is generally for information that will be used to choose the inspection samples or information that will be applicable to all inspection samples throughout the inspection. This information should be made available to the team lead prior to the information gathering visit. The second request (Enclosure 2) is for information that is specific to an individual sample and should be made available prior to the offsite preparation week.

Additional information requests, interviews with your staff, and/or walkdowns of facilities or installed plant components will be made by the team throughout the inspection to complete their review of the selected inspection samples. It is important that all documentation provided to the team is complete and up-to-date to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. Additionally, to facilitate an efficient inspection, we request that a contact individual be assigned to each inspector to ensure information requests, questions, and concerns are addressed in a timely manner.

We understand that Mr. Dave Madsen from your Regulatory Affairs organization is our contact for this inspection. If there are any questions about the inspection or the information requested, please contact the team lead, Mr. Wes Cullum, by telephone at 817-200-1563 or by e-mail at wes.cullum@nrc.gov. Enclosure 3 contains additional contact information for the inspection team.

PAPERWORK REDUCTION ACT STATEMENT

This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: T6 A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) Office of Management and Budget, Washington, DC 20503.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct nor sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in black ink that reads "Vincent Gaddy". The signature is written in a cursive, slightly slanted style.

Signed by Gaddy, Vincent
on 01/05/23

Vincent G. Gaddy, Chief
Engineering Branch 1
Division of Operating Reactor Safety

Docket No. 05000275 and 05000323
License No. DPR-80 and DPR-82

Enclosures:

1. Documents Requested Prior to Information Gathering Visit
2. Documents Requested Prior to Inspection Preparation Week
3. Inspection Team Contact Information

cc w/ encl: Distribution via LISTSERV

DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF COMMERCIAL
GRADE DEDICATION INSPECTION (05000275/2023010 AND 05000323/2023010) AND
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DOCUMENT NAME: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF COMMERCIAL
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Non-Public Designation Category: MD 3.4 Non-Public (A.3 - A.7 or B.1)

ADAMS ACCESSION NUMBER: **ML23005A173**

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OFFICE	RI:DORS/EB1	BC:DORS/EB1			
NAME	WCullum	VGaddy			
SIGNATURE	WLC	VGG			
DATE	01/05/2023	01/05/2023			

OFFICIAL RECORD COPY

Enclosure 1

Documents Requested Prior to Information Gathering Visit

The documents and information requested below should generally be made available to the inspection team for the team's use both on-site and off-site during the information gathering visit. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below.

Documents requested by February 20, 2023:

1. Copy of procedures for dedicating commercial-grade items/services, procuring safety-related structures, systems, and components (SSCs), performing receipt inspections, and controlling counterfeit, fraudulent, and suspect items.
2. Sortable list of commercial-grade items/services, with a brief description, that have completed the dedication process. These items/services may be dedicated by Diablo Canyon Power Plant or dedicated by a vendor (or other licensee) and procured by Diablo Canyon Power Plant. Please note whether the item/service has been installed in the plant. The list should encompass the past six years of dedication activities.
3. Sortable list of SSCs, with a brief description, that were procured safety-related. Please note whether the component has been installed in the plant. The list should encompass the past six years of procurement activities.
4. Sortable list of safety-related SSCs by risk achievement worth (RAW), risk reduction worth (RRW), and Birnbaum value. Include RAW values of 1.3 or greater, RRW values of 1.005 or greater, and Birnbaum values of 1E-6 or greater.
5. Sortable list of dedicated commercial-grade items/services or procured safety-related SSCs that were placed on hold because of concerns identified during the dedication process, receipt inspections, operating experience, etc.
6. Sortable list of dedicated commercial grade-items/services or procured safety-related SSCs that failed after completing dedication/procurement activities. The list should encompass the past six years of these activities.
7. Sortable list of dedicated commercial-grade items/services or procured safety-related SSCs, with a brief description, where dedication/procurement activities were expedited. The list should encompass the past six years of dedication/procurement activities.

8. Sortable list of corrective action program documents, with a brief description, related to commercial-grade item/service dedication, safety-related SSC procurement, receipt inspection, and storage. The list should encompass the past six years of these activities.
9. Copy of any self-assessments or audits of commercial-grade item/service dedication and/or safety-related SSC procurement activities performed within the past six years.
10. Copy of training and qualification records of personnel who performed commercial-grade dedication, safety-related SSC procurement, or receipt inspection activities within the past six years.
11. Copy of the updated final safety analysis report, technical specifications, and technical requirements manual, including applicable bases documents.
12. List of systems, system numbers/designators, and corresponding names.
13. List of site contacts that will be associated with the inspection.

Enclosure 2

Documents Requested Prior to Inspection Preparation Week

For the samples identified by the team lead, the documents and information requested below should generally be made available to the inspection team for the team's use both on-site and off-site during the inspection. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below for each sample.

Documents requested by March 13, 2023:

1. Purchase requisition and purchase orders.
2. Other pertinent vendor/licensee correspondence.
3. Original and updated design specifications.
4. Catalog specifications.
5. Procurement basis evaluation such as like-for-like, equivalency, plant design change packages, drawing and specification updates.
6. 10 CFR 50.59 documentation, if required.
7. Material receiving reports, packing lists/invoices, and other shipping documents.
8. Receipt inspection reports and any related test reports.
9. Other documents to trace the item from the time it was dedicated to the time it was installed, tested, and accepted.
10. Certificates of conformance/compliance/quality.
11. Vendor test and inspection reports.
12. Third-party or sub-vendor test and inspection reports.
13. Shelf-life and storage level information.
14. Vendor dedication/partial dedication information.

15. Design/material/process change history information.
16. Completed commercial-grade dedication document including safety classification, identification of safety functions/application requirements, identification of critical characteristics, identification of verification methods and acceptance criteria for the critical characteristics, evaluation of credible failure modes, if applicable, and identification of the supplier's quality assurance program that meets 10 CFR Part 50, Appendix B.
17. Any deviation from design, material, and performance characteristics relevant to the safety function (nonconformance dispositions).
18. Documents showing objective evidence such as special test and inspection procedures and results, commercial-grade survey reports -item, design, material, and specific performance characteristic (relevant to safety function), and source inspection reports.
19. Completed post-installation test procedure and results.
20. Completed stock or material issue forms and installation work orders or reports.
21. Historical performance information.
22. Relevant design basis information such as UFSAR sections, design basis document, system description, etc.

Enclosure 3

Inspection Team Contact Information

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