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PG&E Letter DCL-12-023

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 Plants (DCPP) Units 1 and 2

Diablo Canyon Power Plant Third Interval Snubber Program, Revision 1

Dear Commissioners and Staff:

In accordance with the provisions of 10 CFR 50.55a(b)(3)(v), Pacific Gas and Electric Company (PG&E) submits Diablo Canyon Power Plant (DCPP) Third Interval Snubber Program, Revision 1. The third 10-year interval began January 1, 2006, for Unit 1 and July 1, 2006, for Unit 2.

DCPP Third Interval Snubber Program, Revision 0, was submitted in December 2010 (PG&E Letter to NRC, DCL-10-157, dated December 21, 2010). This document has been revised, effective February 06, 2012, to clarify the visual examination method in accordance with IWA-2213 and qualification of the inspectors, along with several other editorial changes that improve clarity.

Visual examinations of snubbers will be performed by individuals specifically qualified for snubber inspection in accordance with DCPP procedures, consistent with the applicable requirements of ASME OM Code, Subsection ISTA-1500, Paragraph (e), 2001 Edition with 2003 Addenda. The attributes of the VT-3 method as described in IWA-2213 are fully implemented in the snubber program procedures. However, the term "VT-3" has been removed from our snubber program implementing procedures, because this qualification is not a requirement of the ASME OM Code.

There are no new or revised regulatory commitments as defined by the Nuclear Energy Institute 99-04, "Guidelines for Managing NRC Commitment Changes," dated July 1999, in this submittal.

If you have any questions regarding the information enclosed, or other Inservice Inspection Program for Snubbers, please contact Mr. Nozar Jahangir, Manager, Project Engineering, at (805) 545-6512.

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

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Sincerely,

James R. Becker  
*Site Vice President*

rntt/4231/ SAPN 50403209

Enclosure

cc: Diablo Distribution  
cc/enc: Elmo E. Collins, NRC Region IV  
Michael S. Peck, NRC Senior Resident  
Joseph M. Sebrosky, NRR Project Manager  
Alan B. Wang, NRR Project Manager  
State of California, Pressure Vessel Unit

Enclosure  
PG&E Letter DCL-12-023

Diablo Canyon Power Plant  
Third Interval Snubber Program  
Revision 1

# Diablo Canyon Power Plant

## Third Interval Snubber Program Revision 1

### Unit 1

USNRC Docket: 50-275  
Facility Operating License: DPR-80  
Commercial Operation Date: May 7, 1985  
Third Interval Start Date: January 1, 2006

### Unit 2

USNRC Docket: 50-323  
Facility Operating License: DPR-82  
Commercial Operation Date: March 13, 1986  
Third Interval Start Date: July 1, 2006

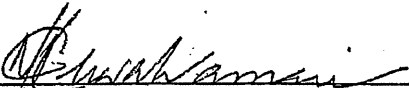
### Approval Record

Prepared by:



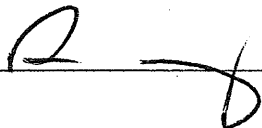
1/29/12

Independent Technical Review:



1-31-12

Approved by:



2-6-12

Third Interval Snubber Program (Revision 1)  
Diablo Canyon Power Plant

1.0 General:

- 1.1 In order to ensure the required operability of all safety related snubbers for both Units 1 and 2 during a seismic or other event, initiating dynamic loads, the inspection and testing of these snubbers shall be implemented and performed in accordance with the requirements of Equipment Control Guideline (ECG) 99.1, "Snubbers."
- 1.2 The Snubber Program, as defined within ECG 99.1, establishes visual examination, functional testing and service life monitoring requirements, pertaining to mechanical and hydraulic safety related snubbers.
- 1.3 The examination boundaries shall include the snubber assembly from pin to pin inclusive. The ISI program owner will be required to complete the surveillance requirements for piping and structural attachments in accordance with appropriate Section XI requirements.
- 1.4 The Snubber Program described in ECG 99.1 adheres to the requirements of the ASME OM Code, Subsection ISTA and ISTD, 2001 Edition with 2003 addenda, as allowed by 10CFR50.55a(b)(3)(v) in lieu of ASME Section XI, IWF-5200(a) and (b) and IWF-5300(a) and (b).
- 1.5 Surveillance Test Procedure, STP M-78B, in conjunction with ECG 99.1 includes a snubber service life monitoring program for hydraulic and mechanical snubbers that adheres to the requirements of ISTD-6000.

2.0 Examination, Testing and Service Life Monitoring Requirements:

- 2.1 Visual examinations and functional testing shall be performed to the extent specified within ECG 99.1.
- 2.2 Snubbers are grouped into DTPG's by design type, in accordance with ISTD-5252 for testing purposes. The groups at DCPD are as listed below:

Snubber Design Type	Unit 1		Unit 2	
	DTPG	Includes	DTPG	Includes
Anchor Darling	AS	AD40, AD70, AD151	AS	AD40, AD70, AD151
	AM	AD500	AM	AD500
	AL	AD1600, AD 5500, AD12500	AL	AD1600, AD 5500, AD12500

Snubber Design Type	Unit 1		Unit 2	
	DTPG	Includes	DTPG	Includes
Basic PSA	PS	1/4NF, 1/2NF	PS	1/4NF, 1/2NF
	PM	1NF, 3NF, 10NF	PM	1NF, 3NF, 10NF
	PL	35NF, 100NF	PL	35NF, 100NF
Paul Munroe	M	20x3 LG Bore	M	20x3 LG Bore
Grinnell	G	All Sizes	G	All Sizes
Anvil	A	All Sizes	A	All Sizes

2.3 The service life of all snubbers shall be monitored and snubbers replaced or reconditioned as required to ensure that the service life is not exceeded between surveillance inspections, during a period when the snubber is required to be operable. The replacement or reconditioning shall be documented and records retained in accordance with DCPD Procedures.

3.0 Examination and Testing Methods:

3.1 Visual examinations shall be performed by individuals qualified in accordance with DCPD procedures. These examinations are conducted in accordance with the attributes as described in IWA-2213 to determine the mechanical and structural condition of the snubber support location and to observe conditions that could affect functional adequacy. Visual examinations and functional testing shall be performed to verify the requirements specified within ECG 99.1 are met in accordance with Subsection ISTD.

4.0 Examination and Testing Frequency:

4.1 Visual examinations and functional testing shall be performed at the frequency specified within ECG 99.1. DCPD currently performs accessible and inaccessible snubber visual examinations during separate refueling outages, which results in approximately one half of the snubber population being examined during each examination campaign.

4.2 Post installation checklists shall be completed whenever new snubbers are installed, reinstallation of existing or swapped snubbers that were functionally tested, or after repairs, replacements or modifications.

4.3 Functional testing requirements for new installations or spares shall be equal to or more stringent than that specified within ECG SR 99.1.

5.0 ASME OM Code Case, OMN-13

5.1 Code Case OMN-13, which allows the extension of the visual examination

interval, has been implemented for snubber inspections during this interval. Code Case OMN-13 is approved for use by the NRC in Regulatory Guide 1.192 (June 2003).

- 5.2 DCPD will continue to perform accessible and inaccessible snubber visual examinations separately, which results in approximately one half of the snubber population for each Unit being examined during a campaign. However, the interval will be extended as allowed by Code Case OMN-13 for each group, accessible and inaccessible.
- 6.0 Examination, Testing and Service Life Monitoring Evaluation:
  - 6.1 Snubbers that do not appear to conform to the visual examination requirements of ECG 99.1, shall be reported for evaluation and appropriate corrective action.
  - 6.2 Snubbers that do not appear to conform to the visual examination acceptance requirements and are later confirmed as operable as a result of functional testing may be declared operable for the purpose of establishing the next visual inspection interval, providing that the unacceptable condition did not affect operational readiness.
  - 6.3 Snubbers that do not meet the operability testing acceptance criteria in ECG 99.1 shall be evaluated to determine the cause of the failure and appropriate corrective action taken.
  - 6.4 The service life of a snubber is evaluated using manufacturing input and engineering information gained through consideration of the snubber service conditions and inservice functional test results. A service life monitoring program is included in ECG 99.1 and Surveillance Test Procedure STP M-78B.
- 7.0 Repair, Replacement and Modification Requirements:
  - 7.1 Repairs, Replacements and Modifications performed on snubbers under this program shall conform, as applicable, to the requirements specified within the ASME Code, Section XI.
- 8.0 Scheduling:
  - 8.1 The visual examinations and functional testing schedules shall be established, tracked and maintained within the DCPD Project Engineering Department.
  - 8.2 The Snubber Program Owner shall identify and track expanded or additional

testing and/or examinations as required by ECG 99.1 and Subsection ISTD.

9.0 Reports and Records:

- 9.1 Reports and records for snubber visual examinations and functional testing shall be maintained for all snubbers included within the Snubber Program.
- 9.2 Applicable records and reports, as required for repair and replacements, shall be maintained for snubbers.
- 9.3 Records of the service life of all hydraulic and mechanical snubbers listed in this program, including the date at which the service life commences or expires, and associated installation and maintenance records will be maintained.