

OCT 26 1973

Pacific Gas & Electric Company
77 Beale Street
San Francisco, California 94106

Docket No. 50-275
Diablo Canyon Unit 1

Attention: Mr. Frederick T. Searls
Vice President and General Counsel

Gentlemen:

Thank you for your letter dated October 19, 1973, informing us of the steps you have taken to correct the items which we brought to your attention in our letter dated September 17, 1973. Your corrective actions will be verified during our next inspection.

Your cooperation is appreciated.

Sincerely,

R. H. Engelken
Director

bcc w/ltr dtd 10/19/73:
RO Chief, FS&EB
RO:HQ (4)
Directorate of Licensing (4)
RO Files

DR Central Files

PDR
Local PDR
NSIC

DTIE

State of California

RO:V

SURNAME ▶

Craws:smg

Spencer

Engelken

DATE ▶

10/26/73

PACIFIC GAS AND ELECTRIC COMPANY

PG&E + 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211

FREDERICK T. SEARLS
VICE PRESIDENT AND GENERAL COUNSEL

JOHN C. MORRISSEY
ASSOCIATE GENERAL COUNSEL

WILLIAM B. KUDER
WILLIAM E. JOHNS
MALCOLM H. FURBUSH
CHARLES T. VAN DEUSEN
MALCOLM A. MACKILLOP
PHILIP A. CRANE, JR.
ASSISTANT GENERAL COUNSEL

October 19, 1973

NOEL KELLY
HENRY J. LAPLANTE
RICHARD A. CLARKE
GILBERT L. HARRICK
EDWARD J. McMANNEY
JOHN S. GIBSON
GLENN WEST, JR.
ARTHUR L. MILLMAN, JR.
CHARLES W. THIBBELL
ROBERT DMLBACH
STANLEY T. BENNER
DANIEL E. GIBSON
SENIOR COUNSEL

DAN GRAYSON LUSBOCK
J. BRADLEY BUNNIN
BERNARD J. DELLASANTA
JACK F. FALLON, JR.
HOWARD V. DOLUS
DONALD L. FREITAS
JAMES C. LUSBOCK
JOSEPH S. ENGLERT, JR.
LOUIS F. BONDFIELD
ROBERT L. BORDON
DENNIS G. SULLIVAN
KATHY TORRANCE
ROBERT L. HARRIS
ATTORNEYS

Mr. R. H. Engelken, Director
Directorate of Regulatory Operations
Region V
U. S. Atomic Energy Commission
P. O. Box 1515
Berkeley, California 94701

Dear Mr. Engelken:

This is in response to your letter dated September 17, 1973 which reports on an inspection conducted by Messrs. J. L. Crews and V. H. Hunter, at Diablo Canyon on August 20-23, 27 and 28, 1973. Your letter asks us to reply to five items wherein we are in apparent violation of quality program requirements. This letter provides the necessary replies.

Item 1 - Reported departure from specifications, drawings, and quality assurance procedures in connection with cable trays and their associated records.

Following the AEC inspection the PGandE Engineering Department visited the site several times and prepared new design drawings showing additional lateral braces for seismic support of cable trays. Installation of seismic supports is scheduled to begin November 1, 1973. Deviation Report No. 177 is being processed to document the discrepancy and corrective action.

A complete survey of all cable trays in the plant by PGandE field inspectors is in progress. To date, the survey is approximately 40% complete and only four instances of unsupported spans in excess of eight feet have been found. These spans have been corrected in accordance with designs prepared by the Engineering Department. Deviation Report No. 188 is being processed to document this discrepancy and the corrective action.

In connection with the identifying colored stripe on cable trays, the Engineering Department has changed the specification to require that the colored stripe be



applied before wire and cable are completely installed. Painting of the identifying color stripes was begun September 24. Deviation Report No. 189 will document this corrective action.

The contractor installing electrical raceways, Howard P. Foley has been instructed once again to comply with the drawings and specifications. He has been directed to institute a reinspection of all electrical raceways within the plant, together with the corresponding documentation. The reinspection, which began on September 24, will assure, in all instances, that the inspection records properly reflect the work accomplished. Deviation Report No. 190 will document this corrective action.

Contractors and PGandE personnel have both been re-instructed on the importance of covering all significant departures from quality requirements with discrepancy reports.

Item 2 - Reported failure to follow specifications and maintain proper records in connection with pulling wire through electrical conduits and to conform to certain design details of electrical raceway supports.

The contractor, Howard P. Foley, has been instructed once again to conform to the specifications, specifically for electrical raceway supports. Meanwhile, the provision in the specification requiring pulling compound on all wire has been changed by the addition of the words "except as directed by PGandE." This will permit certain pulls, where such action is justified, to be made without pulling compound.

A rubber stamp is being procured to document the steps involved in wire-pulling. Appropriate procedures will be written to require the stamp to be put on the back of each pull card. Spaces on the stamp are to be provided for a sign-off by an inspector signifying satisfactory completion of the significant steps involved in pulling wire, including required cleaning of conduits prior to installation of wire and use of an approved pulling compound. Conformance to pulling tension requirements will be one of the items recorded by the inspector. The contractor's Quality Assurance Manual is being revised to define this activity.

Item 3 - Reported failure of two contractors to maintain a satisfactory system for calibration of measuring instruments.

The AEC inspectors found that programs have not been implemented for periodic calibration of two instruments for measuring delta ferrite content of welds. Investigation disclosed that the Severn gauge had been calibrated when it was purchased January 29, 1973. The gauge was recalibrated using Kellogg's procedure on August 29, 1973. Henceforth, it will be recalibrated on an annual basis. A second instrument used by Kellogg, Number 2947, is the property of PGandE. This instrument was calibrated by the manufacturer December 15, 1972, and has been recalibrated using Kellogg's procedure August 29, 1973. This instrument will also be recalibrated on an annual basis. The manufacturer's recommended recalibration period is eighteen months to two years.

It has proved impossible to calibrate the Elcometer gauge and the gauge has been withdrawn from use. It will not be used again unless a satisfactory method of calibration can be found.

A calibrated Severn Ferrite Detector has been purchased by Wismer and Becker, and will be used for future work. This detector is expected to be received today.

In a letter dated September 10, 1973 PGandE directed all contractors at Diablo Canyon to review their calibration procedures for all measuring instruments which require calibration, and to perform audits to assure that all instruments in use are properly included within a calibration system requiring instruments to be recalled and recalibrated on a scheduled basis.

Item 4 - Reported failure of two contractors to maintain proper records and procedures concerning qualifications of personnel performing nondestructive examinations.

Our investigation revealed that all inspectors at Diablo Canyon performing NDT examinations are, in fact, fully qualified in accordance with SNT-TC-1A. Wismer and Becker has now transmitted to the site full supporting records of all NDT inspectors. M. W. Kellogg Company also has records on-site to establish the qualifications of its NDT inspectors. Records for the Level III examiners have been amended to indicate they were appointed without written examination.

Mr. R. H. Engelken
U. S. Atomic Energy Commission

October 19, 1973
Page 4

Records for all NDT inspectors have been amended to require recertification at intervals of three years, and appropriate changes in contractors' procedures are being made to provide for recertification. On September 10, 1973 PGandE, by letter, asked all contractors on the site to review the certification records of their NDT personnel.

Item 5 - Reported failure of a contractor to maintain identity and control over materials, parts, and assemblies, in accordance with his approved quality assurance manual.

A complete investigation has been made of all materials for which Wismer and Becker is responsible. All Class I items that were found to be without tags have been properly tagged and segregated. The heliflow heat exchangers (non-class I) were identified as "reject" and have been disposed of off-site. The contractor's supervisory personnel has been instructed by their main office in Sacramento to adhere to and to enforce the procedures contained in their Quality Assurance and Control Manual.

In an effort to eliminate any deficiencies in our quality assurance program on October 10, 1973 we initiated a mandatory training program for all on-site field engineer and inspecting personnel. The program is conducted by the Resident Engineers. The objective is to re-emphasize the quality requirements of on-site activities. The program will continue until we are satisfied that all personnel are thoroughly informed on quality requirements and on the importance of enforcing strict compliance with specifications.

Very truly yours,

F. T. Searls