

UNITED STATES

NUCLEAR REGULATORY COMMISSION REGION V

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MEMORANDUM FOR:

Harold R. Denton, Director

Office of Nuclear Reactor Regulation

50-215 50-323

FROM:

R. H. Engelken, Regional Administrator

SUBJECT:

DIABLO CANYON DESIGN VERIFICATION PROGRAM -

This is in response to recent telephone discussions.between you and me and members of our staffs regarding the above subject. We have examined the recent reports by R. F. Reedy, Inc. regarding the assessment of the Quality Assurance (QA) programs of PG&E and its design seismic consultants. The findings of these reports are generally consistent with the findings of Region V's inspection which was undertaken following initial discovery and reporting of seismic design errors and reveal potentially serious and wide ranging inadequacies in QA programs for design of the Diablo Canyon plant.

The report identifies no significant adverse findings specific to the QA programs of PG&E and its contractors for on-site construction activities. However, the nature of the adverse findings regarding PG&E's own QA program and particularly the lack of PG&E management periodic assessment of the effectiveness of QA program implementation, raises (implicitly at least) questions regarding the adequacy of these programs.

In consideration of the above, we offer the following recommendations regarding the current scope of the design verification program.

- 1. The results of an assessment of the QA programs of selected non-seismic safety related design consultants, similar to the Reedy assessments recently completed for seismic design consultants, should be provided to the staff prior to NRC granting authorization for the resumption of fuel loading and low power testing under the operating license.
- 2. Interim findings of the verification program for Phase II, sufficient to make a preliminary judgement as to the overall adequacy of design effort, should be provided to the staff for those non-seismic design consultants where significant adverse QA program findings result from 1., above, prior to NRC granting authorization for the resumption of fuel loading and low power testing under the operating license.
- 3. Expand the scope of Phase II of the current verification program to include an assessment, similar to the Reedy assessments for design consultants, of the QA programs for at least two principal on-site construction contractors, such as the prime civil/structural construction contractor and the reactor coolant system erection and welding contractor.

We would be pleased to discuss these recommendations with you further should you wish.

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R. H. Engelken Regional Administrator 2019

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cc: H. E. Schierling, NRR

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