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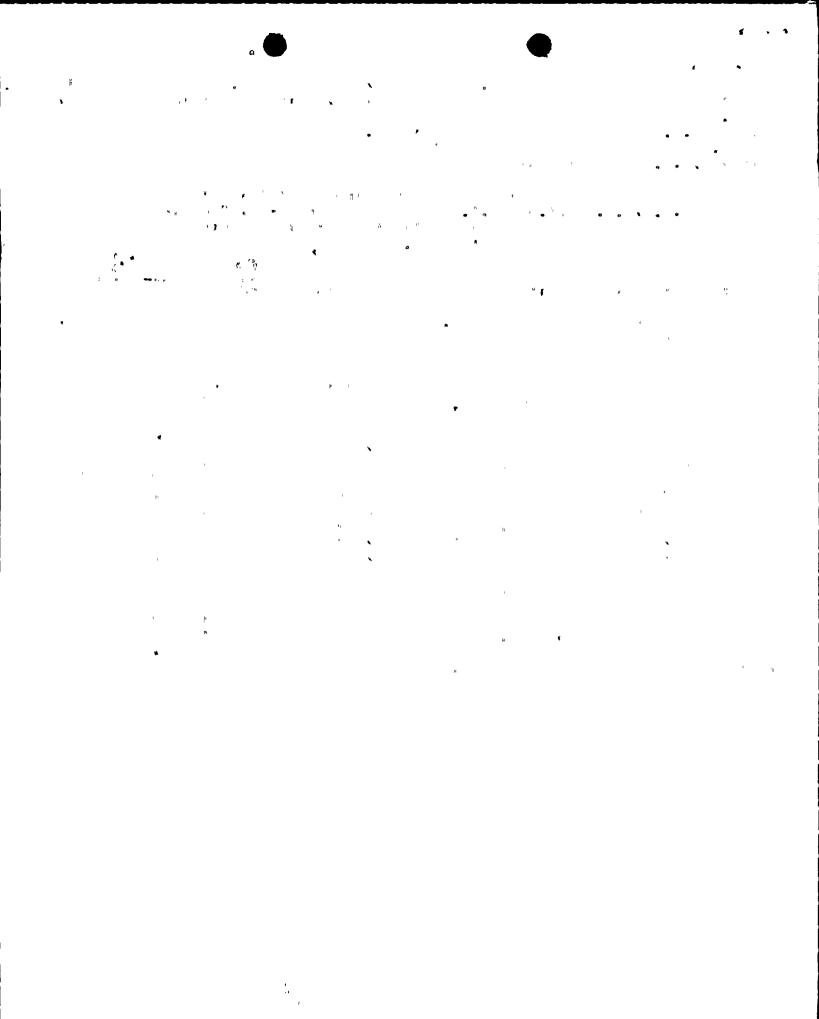
SUBJECT: Advises of completion of work required to fulfill Items 3.1.1.3.1.2.3.1.3 & 3.1.4 of Generic Ltr 83-28, "Required Actions Based on Generic Implication of ATWS Events," concerning post-maint testing.

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PACIFIC GAS AND ELECTRIC COMPANY

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JAMES D. SHIFFER VICE PRESIDENT NUCLEAR POWER GENERATION

January 2, 1985

PGandE Letter No.: DCL-85-002

Mr. George W. Knighton, Chief Licensing Branch No. 3 Division of Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
Generic Letter 83-28, Item 3.1
Post Maintenance Testing

Dear Mr. Knighton:

In our letter of November 7, 1983, PGandE provided the status of conformance and the schédules for improvements planned for Units 1 and 2 to assure compliance with Generic Letter 83-28, "Required Actions Based on Generic Implication of ATWS Events." In that letter, NRC Action Item 3.1, "Post-Maintenance Testing" (Reactor Trip System Components), was divided into Items 3.1.1, 3.1.2, 3.1.3, and 3.1.4. PGandE has performed the work required to fulfill these four items for Unit 1 as discussed below.

3.1.1 Requirement

"Obtain list of reactor trip components."

3.1.1 Action

PGandE has developed a list of reactor trip components.

3.1.2 Requirement

"Review maintenance procedures and Technical Specifications affecting reactor trip components to assure post-maintenance testing is performed."

3.1.2 Action

PGandE has reviewed maintenance procedures and Technical Specifications

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- Mr. G. W. Knighton January 2, 1985 Page 2

affecting reactor trip components to ensure that post-maintenance testing is performed. Administrative Procedure NPAP C-6 ensures that Surveillance Tests are conducted after maintenance is performed on safety-related components. Accordingly, the tests must be completed satisfactorily before the component(s) or system(s) are declared operable.

3.1.3 Requirement

"Review vendor and engineering recommendations to ensure appropriate test guidance is included in maintenance procedures and Technical Specifications affecting reactor trip components."

3.1.3 Action

PGandE has reviewed applicable vendor and engineering recommendations to ensure that appropriate test guidance is included in maintenance procedures and technical specifications affecting reactor trip components. Over 95 percent of all recommendations were addressed by PGandE procedures. Nine recommendations need further review to determine if they should be incorporated into future revisions of the appropriate procedure(s). If they are determined to be applicable, the procedures will be revised by March 31, 1985.

3.1.4 Requirement

"Identify any post-maintenance test requirements in Technical Specifications that degrade safety of reactor trip components."

3.1.4 Action

PGandE has not identified any post-maintenance test requirements in the Technical Specifications that significantly degrade the safety of reactor trip components. However, PGandE would like to call attention to letter DCL-84-364, dated November 30, 1984, that responded to Generic Letter 83-28, Item 4.5.3.

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That letter referenced WCAP 10271-S1 which is currently under review by the NRC and would alter existing intervals for certain reactor trip component testing. PGandE will continue to follow that work as stated in the previous letter.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

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