

DIABLO CANYON ALLEGATION MANAGEMENT PROGRAM

NOVEMBER 23, 1983

Approval:

R. DeYoung 11/23/83
R. DeYoung, Director, IE Date

H. R. Denton 11/23/83
H. R. Denton, Director, NRR Date

J. B. Martin 11/23/83
J. B. Martin, Administrator, Date
Region V

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Diablo Canyon Allegation Management Program

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ATTACHMENTS

1. Diablo Canyon Allegation Management Staff
2. Format For Diablo Canyon Nuclear Power Plant Allegation and/or Investigations Summary
3. Format for Allegation Action Plan

DIABLO CANYON ALLEGATION MANAGEMENT PROGRAM

I. Purpose

The purpose of the Diablo Canyon Allegation Management Program is to:

Provide for a systematic examination and analysis of allegations and expressions of concern pertaining to design, construction, operation and management of safety-related structures, systems, and components at the Diablo Canyon Nuclear Power Plant; and to

Provide for an assessment of those allegations and concerns that question Diablo Canyon criticality readiness, prior to a Commission consideration of restoration of the license for reactor criticality and low power (less than 5%) testing; and to

Provide for an assessment of those allegations and concerns that question plant readiness for power ascension testing and full power operations, prior to a Commission consideration of this issue.

II. Scope

The Diablo Canyon Allegation Management Program is intended to encompass all allegation, or expressions of concern which may be construed as allegation, which pertain to design, construction, operation, and management of safety-related structures, systems, and components, at Diablo Canyon. In this regard, the Allegation Management Program will also address certain concerns raised by Intervenor and members of Congress (e.g. implications of a 1977 audit by Nuclear Services Corporation of a Diablo Canyon Contractor). The program requires that all NRC Offices receiving new Diablo Canyon allegations forward those allegations to the Allegation Management Staff in a timely manner.

III. Methodology/Approach

The Diablo Canyon Allegation Management Program requires the combined efforts of NRC offices to identify all allegations upon receipt and coordinate resolution of the allegations with the Diablo Canyon Allegation Management Staff. The Diablo Canyon Allegation Management Staff is a coordination group made up of representatives of Region V, NRR, IE and ELD, as identified in Attachment 1.

The Allegation Management Program requires development, updating and maintenance of a comprehensive listing of allegations related to Diablo Canyon and provides for a coordinated assessment and resolution. The management program is not intended to circumvent any other established NRC management program (e.g. the Allegation Tracking System) or relieve

any NRC office of its normal organizational and technical responsibilities. To the contrary, the Allegation Management Program is intended to complement and coordinate the activities of the NRC Offices as they relate to Diablo Canyon allegations.

The Allegation Management Program includes the following elements:

- (1) Development of a comprehensive listing of Diablo Canyon allegations. The format for the listing is provided in Attachment 2. The distribution of the actual list is controlled and limited.
- (2) Use of procedures to maintain anonymity and confidentiality of alлегers when requested.
- (3) Confirmation with the allegor (where possible and appropriate) that the NRC has an accurate understanding of the concern.
- (4) Definition of an action plan for each allegation which provides an approach to resolution. The action plan shall include such items as: technical approach to resolution; identification of lead/support responsibilities, resource requirements, schedule for completion; and includes an initial assessment of the potential significance of the allegation. The format for an allegation action plan is provided in Attachment 3.
- (5) Responsible Lead Office management review and agreement on the action plan for each allegation.
- (6) Implementation of the action plan.
- (7) Status reporting and preliminary assessments of allegations significance and programmatic implications in time to support Commission consideration of Diablo Canyon licensing actions.
- (8) Feedback to the allegor, where possible, for further assurance that evaluations accurately address concerns:

IV. Schedule

Actions related to Diablo Canyon allegations shall be accomplished in accordance with the following general schedule:

Approval of Allegation Management Program and Individual
Action Plans

11/23/83



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On-site review/inspection effort*	11/28 - 12/9/83
Individual item status/preliminary assessment reports	12/9/83
Pre-criticality project status assessment report	12/19/83
Updated individual item status/assessment reports	(later)
Pre-power ascension Project Assessment Report	(later)

It is anticipated that during the course of this program additional allegations will be received and that findings resulting from the review or inspection of current allegations may require expanded examinations. Accordingly, new individual allegation action plans will be developed and existing plans may be expanded. The thoroughness of NRC evaluations shall not be influenced by the timing of licensing decisions by the Commission. However, full effort shall be made to provide the Commission with as comprehensive and accurate assessments of allegation significance as is possible.

V. Protection of Individuals

The identity of persons providing allegations to the NRC shall not be disclosed as a matter of practice. In addition, for those individuals expressly requesting confidentiality all efforts shall be made to protect the individuals identity. This will include: limited and controlled distribution of allegation documentation and correspondence; minimal use of names, identifying titles, or position descriptions in written material; enlarged sampling of activities so that it is not evident to personnel outside the NRC that the particular sample selection is related to the alleged; and other indirect approaches toward investigation/inspection of allegations. During the course of NRC reviews or inspections, similar efforts shall be made to protect the identity of licensee or contractor employees who provide information which may be construed as being critical of licensee or contractor activities.

Receiving, clarifying, evaluating, and documenting allegations may involve direct NRC staff contact with alleged and will involve representation of the alleged concerns in NRC documentation and other communications. These oral and written communications shall be professional and objective in nature and shall not reflect a pre-judgemental or defensive posture on the part of the NRC staff. Further, these communications shall not infer criticism of the alleged's motives, or technical expertise.

*Technical review, inspection, and investigation activities for many of the allegations have been in progress for some time. The 11/28-12/9/83 on-site review refers to the consolidated team effort to address the bulk of the known allegations.

VI. Development and Retention of Supporting Data

An individual record file shall be developed and maintained for each allegation by the lead NRC office. This file will contain or reference pertinent documentation associated with the allegation. Resolution of each allegation shall be supported with a clearly auditable record trail. Accordingly, the record file shall contain or make reference to all significant records relied upon to reach resolution.

Records of personnel interviews shall be developed and retained in those instances where interviews are relied upon by the NRC staff for decisions of technical adequacy. Interview records shall, as a minimum contain: the date, time, location of the interview; the name of the interviewer and interviewee; and a summary of questions asked and relevant information obtained.

Upon issuance of reports which close out allegations, those records which are appropriately referenced in the NRC reports and are traceable through some other means (e.g. meeting transcripts, permanent licensee records, etc.) may be removed from the allegation record file.

VII. Special NRC Actions

As addressed in certain allegation action plans, it may be appropriate to initiate actions which are not routinely required for allegation follow-up. These may include: issuing requests for information to the licensee under 10 CFR 50.54 (f), Confirmation of Action letters or orders; or requests to the Department of Justice to grant immunity for certain individuals. Actions such as these, if required, shall be handled in accordance with established NRC procedures.

VIII Manpower Accounting

Offices shall implement established manpower accounting systems to monitor resource expenditures related to this ability.



11-11-11

Diablo Canyon Allegation Management StaffOrganizationNamePosition

Region V

T. W. Bishop

Staff Leader

NRR

G. W. Knighton

Member

IE

R. F. Heishman

Member

ELD

J. Lieberman

Member



11/11/11

November 29, 1983

MEMORANDUM FOR: Chairman Palladino
Commissioner Gilinsky
Commissioner Roberts
Commissioner Asselstine
Commissioner Bernthal

FROM: William J. Dircks
Executive Director
for Operations

SUBJECT: PLANS FOR DEALING WITH ALLEGATIONS RELATING TO
DIABLO CANYON

Enclosed for your information is my guidance for dealing with the approximately 72 Diablo Canyon allegations and the staff work plan developed to implement that guidance.

Action plans which assign staff and outline the approach to resolution have been developed for each allegation. These detailed worksheets are available should any Commissioner desire to review them. The initial on-site work will be conducted this week with approximately 17 staff assigned. Other related work has begun or will begin promptly.

The interim report will be provided to me by December 19 - a date selected so as to be approximately 10 days prior to the current estimate of the licensees criticality readiness. I will provide it to you promptly after receipt.

(Signed) William J. Dircks

William J. Dircks
Executive Director
for Operations

Enclosure:
As stated

cc: OPE
OGC



I expect all Offices involved to give full support to Mr. Bishop in this effort. The OEDO should be contacted if problems develop or assistance is needed.

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

cc: B. Hayes
G. Cunningham
V. Stello
R. Minogue
T. Bishop, RV

