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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596
OCT 31 1984

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MEMORANDUM TO: File
FROM: Allegation Review Board
SUBJECT: DIABLO CANYON ALLEGATION REVIEW

DESIGNATED ORIGINAL
Certified By Det Noack

On Wednesday, October 24, 1984, an allegation review panel comprised of Messrs. Bishop, Shollenberger, Dodds, Kirsch, and Crowley, met to review a number of open allegations, for which Region V has closeout responsibility.

A. The following allegations, identified by Diablo Canyon Allegation File (DCAF) system number have been determined to be closed:

1. The Board found the following numbered statements, assertions, and/or expressions of opinion to be so generalized, unsubstantiated, and lacking in reasonableness, competency, or materiality as to not indicate a substantial or credible problem in connection with NRC licensed activities. Accordingly, the Board did not consider them "allegations" warranting further Agency attention.

| | | | | |
|-----|-----|-----|------|------|
| 667 | 799 | 854 | 1006 | 1251 |
| 732 | 810 | 858 | 1018 | 1261 |
| 760 | 820 | 921 | 1110 | 1274 |
| 798 | 853 | 980 | 1115 | |

2. The Board found the following numbered statements, complaints, or concerns to be "allegations", but, that they were either substantially duplicative of earlier resolved allegations, or they were rebuttals which presented no significant new facts:

| | | | | | | | | | | | |
|-----|-----|-----|-----|-----|-----|------|------|------|------|------|------|
| 669 | 706 | 710 | 714 | 722 | 859 | 1093 | 1112 | 1252 | 1256 | 1437 | 1462 |
| 703 | 707 | 711 | 717 | 723 | 935 | 1095 | 1113 | 1253 | 1260 | 1457 | 1464 |
| 704 | 708 | 712 | 720 | 744 | 947 | 1098 | 1114 | 1254 | 1262 | 1458 | 1471 |
| 705 | 709 | 713 | 721 | 837 | 948 | 1100 | 1244 | 1255 | 1263 | 1460 | |

3. Based on review of the licensee's response contained in PG&E letter DCL-84-328, the board has determined that, for the following numbered allegations, the response appears to have adequately addressed the issues and, therefore, these allegations require no further Agency action:

| | | | | | | | | | | |
|-----|-----|-----|-----|-----|-----|-----|------|------|------|------|
| 392 | 465 | 772 | 800 | 881 | 909 | 932 | 986 | 1035 | 1206 | 1286 |
| 393 | 513 | 775 | 811 | 882 | 916 | 942 | 987 | 1036 | 1207 | 1289 |
| 394 | 571 | 777 | 823 | 883 | 918 | 952 | 989 | 1090 | 1208 | 1344 |
| 405 | 635 | 783 | 860 | 884 | 928 | 953 | 998 | 1202 | 1220 | 1364 |
| 406 | 759 | 784 | 867 | 886 | 931 | 969 | 1007 | 1205 | 1285 | |

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- 4. Based on review of the licensee's response contained in PG&E letter DCL-84-243, the Board has determined the following numbered allegation appears to have been adequately addressed and, therefore, requires no further Agency action: 715
- 5. Based on the attached narratives written by D. Kirsch, the Board has determined the following numbered allegations require no further action: 1302, 1436

B. Closeout responsibility for the following allegations shall be transferred as follows:

- 1. Closeout responsibility for the following allegations has been transferred to OI:

395 570 774 779 782 1465 1468

- 2. Closeout responsibility for the following allegations has been transferred to NRR:

665 838 840 1037 1166
813 839 1009 1039 1438

- 3. The following allegations will be submitted to PG&E for evaluation and response: 806, 919

T. W. Bishop 10/30/84
T. W. Bishop Date

D. F. Kirsch 10/30/84
D. F. Kirsch Date

L. W. Shollenberger 10/30/84
L. W. Shollenberger Date

R. T. Dodds 10/30/84
R. T. Dodds Date

T. F. Crowley 10/30/84
T. F. Crowley Date

cc: D. F. Kirsch
T. Crowley



1-1

ALLEGATION NO.

1302

CHARACTERIZATION

ESD 264 merged QC and production records which compromised QC independence.

BOARD ACTION

The allegor states that section 5 of ESD-264 institutionalized a merger of QC and production records in that both organizations had access to the process sheet, which was attached to the work package.

The staff has reviewed ESD-264, in particular Section 5, and finds:

(1) ESD-264 was properly approved by Pullman and licensee management, as required; (2) Section 5.1 provides for QA/QC and ANI approval of the process sheet; (3) Section 5.2 provides an 'information only' copy to the rod room; (4) Section 5.3 provides for QA verification of the latest revisions of referenced drawings and procedures, and issuance of the process sheet to the crafts and/or engineering; (5) Section 5.4 provides controls to assure that the craft returns all process sheets to a designated location prior to the end of shift (to preclude loss of the process sheet); (6) Section 5.5 provides for QA verification of compliance with section 5.4; (7) Section 5.6 provides for QA sorting of completed process sheets and those not completed, for reissue; (8) Section 5.7 provides for filing of completed process sheets.

Thus, the staff does not consider that these controls in any way compromised QC's independence, as alleged. Further, the staff considers the controls provided by ESD-264, Section 5, to be appropriate and responsible.

No further action is required. The Board considers this allegation to be closed.



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ALLEGATION NO.: 1436

CHARACTERIZATION:

The discovery of foreign manufactured plate steel by PG&E was not reported to the NRC.

BOARD ACTION:

The staff has determined that PG&E intends to effect a "buy American first" philosophy and has effected this philosophy by including such requirements in the Diablo Canyon contract specifications as a standard 'boiler plate' requirement. PG&E does on occasion purchase steel shapes manufactured by foreign suppliers in the event that an American manufactured unit is not readily available from a supplier, on the Approved Suppliers List, due to unacceptable lead time or stock availability. These deviations from Contract Specification requirements are routinely documented and approved on a case-by-case basis. Even though a steel shape, manufactured by a foreign supplier, may be purchased, the steel is subjected to the same quality requirements as would be an American manufactured steel shape (e.g.; Certified Material Test Report, QA reviews of documentation, etc.). Thus, the staff considers that the purchase of foreign manufactured steel was responsibly controlled by the licensee and does not represent a situation of any safety significance.

Regarding the alleged failure to report the use of foreign manufactured steel shapes to the NRC, the staff finds that regulatory requirements do not require the licensee to report such instances to the NRC.

The Allegation Review Board considers this allegation to be acceptably resolved and closed. No further action is required.



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