

RIDS

MAY 3 1985

Mr. Allan C. Wade
165 South Dolliver
Pismo Beach, California 93449

Dear Mr. Wade:

Subject: ATS #RV85A004

This refers to the results of your inquiry into your concerns identified in our letter to you dated February 13, 1985. Enclosed is a copy of PG&E's response which we believe adequately addresses your stated concerns. This is also in response to your letter to President Reagan which was forwarded to us for action on April 4, 1985. We understand that CAS OSHA is examining your industrial safety concerns.

In closing, we appreciate you bringing your concerns to our attention. If you have additional questions, or if I can be of further assistance in this matter, please do not hesitate to contact me.

Sincerely,



D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects

Enclosure:
PG&E Letter No: DCL-85-118

cc w/enclosure:
O. Shackleton, OI

bbc w/enclosure:
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Mr. Martin
R. Dodds, RV
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PACIFIC GAS AND ELECTRIC COMPANY

PG&E + 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

March 20, 1985

PGandE Letter No.: DCL-85-118

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323
Diablo Canyon Units 1 and 2
Response to Allegation #1656

Dear Mr. Martin:

An NRC Region V letter dated February 12, 1985, forwarded allegation number 1656 for PGandE's evaluation, investigation, and response. Enclosed is PGandE's response to the allegation identified in that letter. PGandE believes that the evaluation and investigation conducted resolve this allegation for both Units 1 and 2.

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

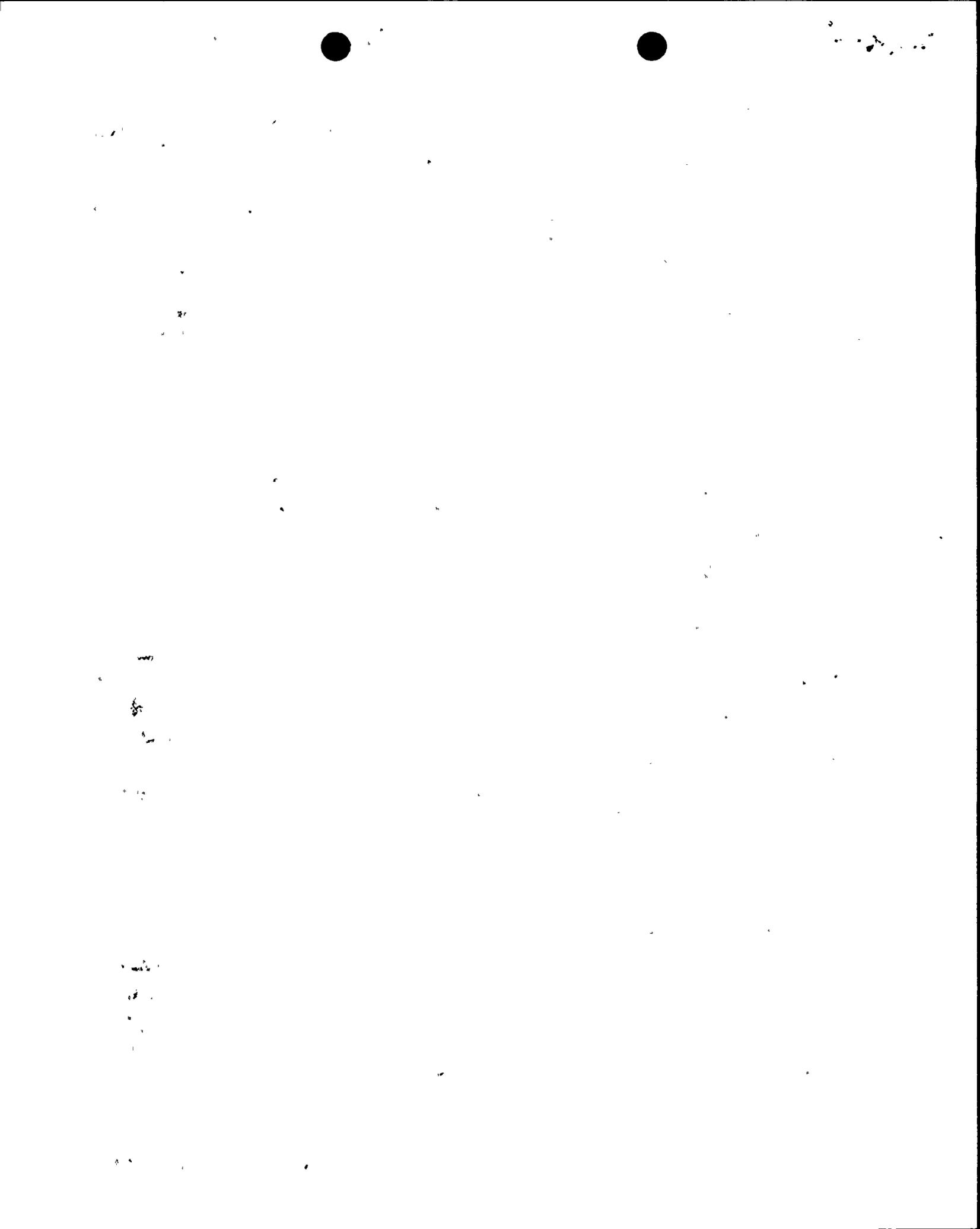
Sincerely,



Enclosure

cc: R. T. Dodds
G. W. Knighton
H. E. Schierling
Service List

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ENCLOSURE

NRC Allegation #1656

It is alleged that:

A) Mr. Wade is concerned with the direction given to him by Mr. Than Hoang, a Bechtel Engineer, regarding system completion and the use of material for system completion. Mr. Hoang instructed Mr. Wade and other members of Mr. Wade's work crew to remove material from other areas of the plant and install it in a different area to complete punchlist items required for area turnover.

B) Mr. Wade questions the disposition of cable cut from a reel for a particular job, then not used due to an error in material selection.

A) The Diablo Canyon area turnover program was established to provide PGandE's Nuclear Plant Operations (NPO) Department an opportunity to walk down areas of the plant with the Diablo Canyon Project Team General Construction (PTGC) personnel to ensure that all items in each area have been completed prior to turnover. (Note that the area turnover program is not to be confused with the system turnover process which is performed on a system-by-system basis by the PTGC startup group after successful completion of startup testing.) The area walkdown is performed in advance of the scheduled turnover date and a punchlist is prepared to delineate those items which must be completed prior to NPO acceptance. Normally, the items put on the punch list are cosmetic in nature, e.g., scratches on painted surfaces, broken exit lights, damaged light fixtures, etc., and have nothing to do with the actual functioning of systems. If more major deficiencies are identified, they would be handled using the normal procedures for such occurrences; i.e., Work Requests, Minor Variation Reports (MVRs), Design Change Notices (DCNs) etc.

At the present time, Mr. Than Hoang is no longer working at the Diablo site and is unavailable for consultation. However, consistent with normal industry practice, when material required to complete an area on schedule is not readily available from storage, such material could be provided from other areas of the plant which were scheduled for later turnover. Replacement material would then be ordered for the area from which it had been removed.



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Equipment such as pumps, motors, valves, etc. could not be transferred in this manner without the necessary analysis, approval, and documentation. This process is common in the completion of any construction project and does not compromise the quality of the plant.

B) Although the allegation does not specify any specific instances when the allegers' concern could lead to an adverse impact on safety, the process involved is an acceptable one which is in normal use throughout the industry.

When cable is required, it is ordered by the foreman in the field and cut to length by electricians in the wireyard. The foreman uses the information on a cable pullcard, prepared by the Engineering Department and forwarded to the contractor for implementation, to ascertain the appropriate cable material. If there are any miscommunications between the foreman and the yard, the result might be the dispatch of the wrong type or length of wire. Before the cable is accepted for use, the foreman would compare the information on the pullcard against the tag on the cable and any unacceptable cable would be rejected. The correct cable would then be reordered from the yard. The rejected cable would either be returned to the wireyard, scrapped, or used elsewhere where such cable is acceptable.

