

RSTB



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

Docket No. 50-275/85-23

AUG 06 1985

Pacific Gas and Electric Company
77 Beale Street, Room 1435
San Francisco, California 94106

Attention: Mr. J. D. Shiffer, Vice President
Nuclear Power Generation, Licensing

Gentlemen:

Subject: NRC Inspection of Diablo Canyon Unit 1

This refers to the team inspection conducted by Mr. A. Toth and other members of our staff on June 10-28, 1985, of activities authorized by NRC License No. DPR-80, and to the discussion of our findings held by Messrs. Toth and Cillis with Mr. Gisclon and other members of your staff at the conclusion of the inspection.

The specific areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

The inspection focused primarily on your administrative controls associated with the four most important safety-related systems based on probabilistic risk assessment, their implementation and the extent of management involvement and support. More specifically selected systems and activities related to the auxiliary feedwater; diesel generators; 125V vital DC system; high pressure safety injection; offsite committee activities and health physics programs.

Summary of Areas Inspected and Conclusions

A. Corporate Policy Definition and Implementation

This area was examined to determine if documented corporate policies included an adequate commitment to safety, quality and personnel competence. Further, the inspection determined whether such policies were disseminated and incorporated into working procedures and supported by adequate resources. Sufficient strength was found in the breadth and depth of the commitments to these principals. Also the inspection found that various mechanisms had been provided to solicit and encourage employee identification of problems and needed improvements.

B. Quality Control Organization Qualifications and Planning

The intent of the inspection in this area was to assess the human resources applied to the quality control function and also to assess Quality Control policies. The NRC inspection team found adequate policy documents for the quality control inspectors and sufficient experience and qualification levels in the key staff. In addition, an inspection

8508210446 850806
PDR ADDCK 05000275
PDR

1501

Vertical text or markings on the left side of the page.

Faint markings or text in the top right corner.



Faint markings or text at the bottom center of the page.

planning and results evaluation function was in place. The quality control organization appeared to be satisfactorily supported by plant and corporate management. However, the inspector noted that a need existed to strengthen the plant specific systems knowledge of the Quality Control staff.

C. General Office Nuclear Plant Review and Audit Committee (GONPRAC)

The intent of this portion of the inspection was to verify that GONPRAC, the offsite committee, was functioning in conformance with Technical Specification Requirements. The Team found that the GONPRAC was meeting all of its regulatory requirements.

D. QA Audit Program (Onsite)

The NRC inspection team found that the QA Audit Program as it relates to implementation of the plant technical specifications at the Diablo Canyon facility was effective. The Quality Support Organization, which is a recent addition to the onsite plant staff, demonstrated management support beyond the requirements of the Quality Assurance Program.

E. QA Program for Measuring and Test Equipment (M&TE)

The QA Program relating to the control of measuring and test equipment was inspected to determine whether procedures were established and implemented to assure that tools, gauges, instruments, and other measuring and testing equipment used in activities affecting quality were properly controlled, calibrated and adjusted to maintain precision and accuracy within specified limits.

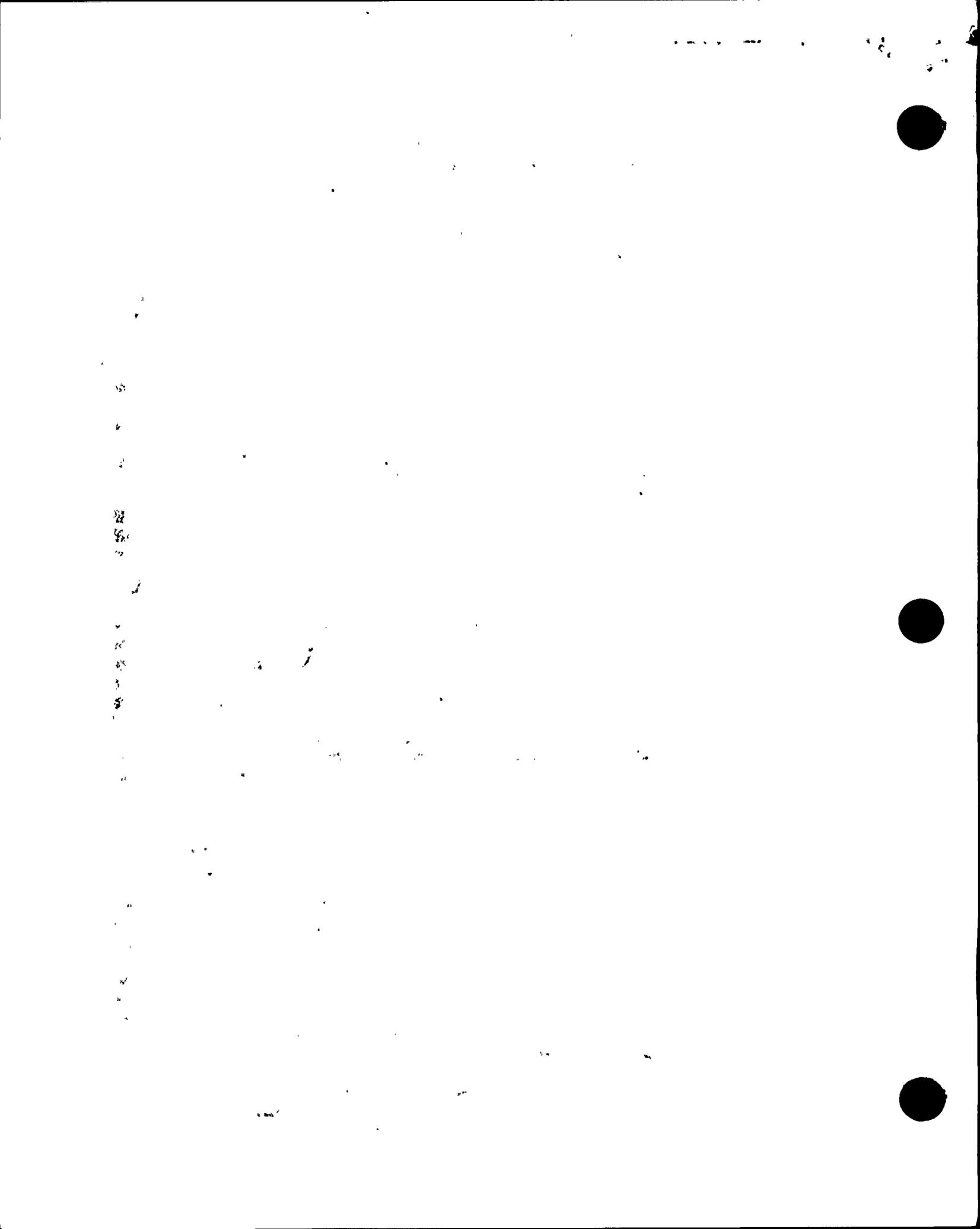
From a review of QA/QC procedures and audit reports it was determined that an adequate QA/QC Audit program has been established that could be effective in ensuring the proper calibration and control of measuring and test equipment. However, it was found from a review of successive audit reports that timely and effective corrective action had not been taken with regard to certain audit findings on the control of M&TE. Your response to the Notice of Violation I, (below and Appendix A) should address this matter as well as the observations of the NRC which resulted in the Notice of Violation.

F. Surveillance Testing and Calibration Control of Plant Instrumentation

The surveillance testing and calibration programs were inspected to determine whether procedures were established and implemented for control of surveillance testing and calibration as required by the Technical Specifications. (See also NRC Reports 50-275/85-11 and 50-275/85-21)

1. Surveillance Testing

The administrative procedure which establishes controls over surveillance testing and seventeen surveillance testing procedures in four safety related systems were examined.



It is concluded from the review of these procedures that an adequate control program exists to ensure proper and timely surveillance testing.

2. Calibration

The administrative procedures which establish the controls for calibration of components associated with safety related systems for the I&C Department, and Electrical and Mechanical Maintenance Departments were examined along with four specific equipment calibration procedures. It is concluded that the existing program can ensure the proper calibration of components for safety related systems.

However, in the examination of logs and records for Measuring and Test Equipment (M&TE) in the three maintenance departments (I&C, Mechanical and Electrical) problems were identified with the implementation of the program. As a result of NRC inspection sampling in the three departments, it was found that nine items out of 37 were not properly controlled.

It is concluded that although the existing controls appear adequate, these controls were not being adequately implemented. This is a violation of regulatory requirements.

G. Technical Specification Compliance

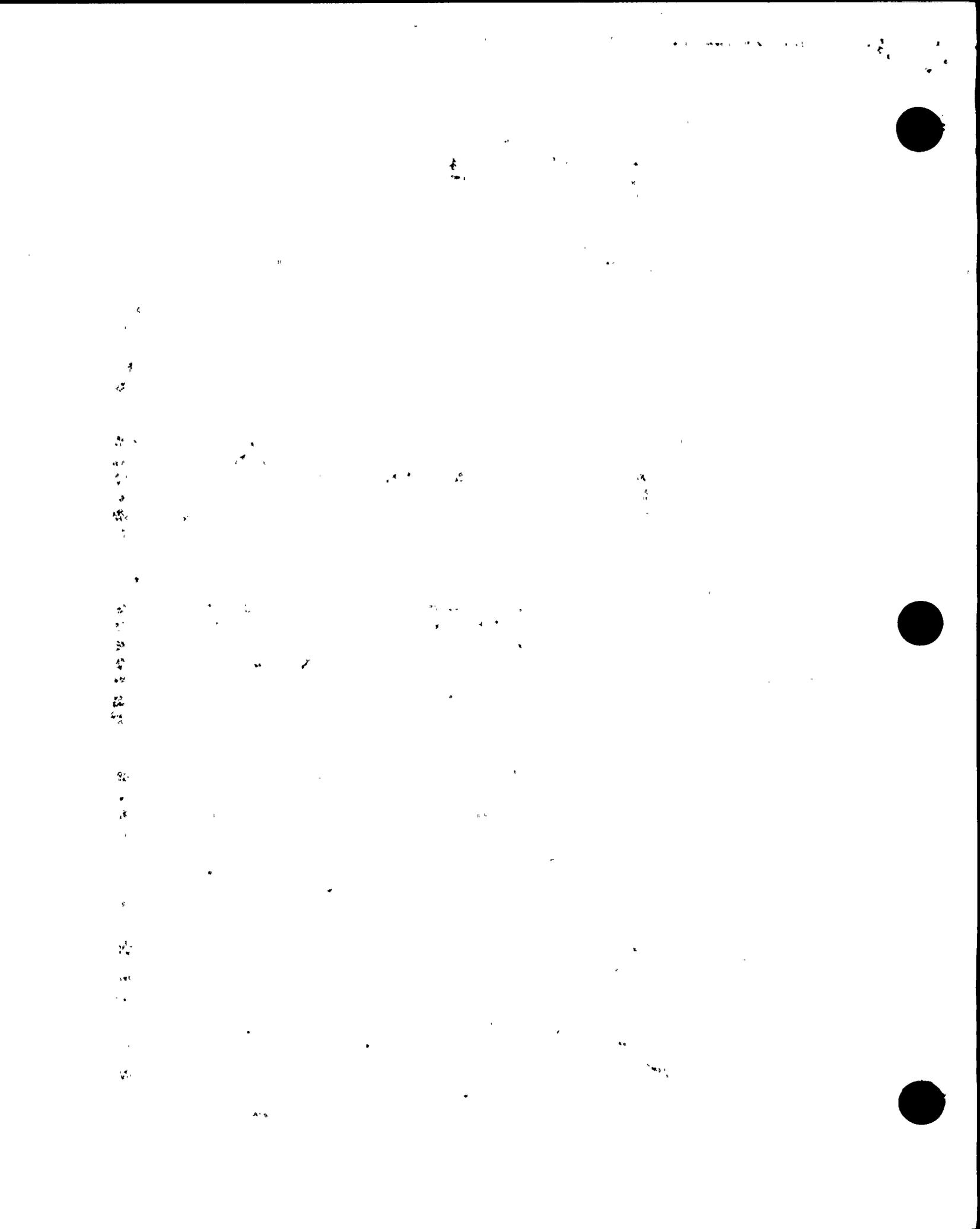
An inspection was conducted to confirm plant operations compliance with the Technical Specifications (TS). Procedures for surveillance required by TS were sampled and reviewed to determine if surveillance frequencies for the required mode of plant operation were being met. One minor weakness identified was that final reviews by management of surveillance data sheets failed to identify, in four cases, the errant entry of calibration dates for equipment used during surveillance testing. It was otherwise concluded that, for the surveillance intervals reviewed, the licensee had met their Technical Specification requirements.

H. Plant Procedures

Selected plant administrative, operational and surveillance procedures were examined and found to be adequate. However, the results of the examination revealed that operators were deleting steps in procedures without adequate control over the deletion process by initialing steps as NOT APPLICABLE (N/A). The proper use of N/A is presently being formalized in an administrative procedure.

The inspection team also found that the procedure defining control room manning requirements would allow fewer SRO licensed individuals on shift during certain plant conditions, than the Technical Specifications required. This procedure is being modified to avoid any misinterpretations.

A minor weakness was found to exist in several surveillance procedures in that the procedures did not require documentation of independent



verification of the applicable steps as required by I.C.6 of NUREG 0737. The plant procedures are undergoing the first biannual review required by the facilities Technical Specifications. Therefore, it is incumbent upon the licensee management to assure that the surveillance procedures are upgraded during the review to include independent verification of operating activities affecting the operability of safety systems.

I. Maintenance Program

The inspectors examined the maintenance program by reviewing the administrative procedures that define and control the program. The procedures appear adequate to control the program and its implementation. However, the inspectors noted that the plant equipment failure tracking and trending procedure has been in place for two years but has not been implemented. Licensee action regarding this matter was confirmed following the inspection.

The implementation of the maintenance program was examined by conducting a detailed review of 51 corrective and preventive maintenance packages associated with the centrifugal charging pumps, diesel generators, auxiliary feedwater system, and the 125 VDC system. The inspectors concluded that the maintenance program appeared to be implemented satisfactorily.

J. Design Change Control

In order to evaluate the licensee's design change control program for modifying plant systems, structures and components, the inspection team reviewed applicable procedures, examined records and in-process documents, and interviewed responsible personnel. It was concluded that the licensee's program was in conformance with regulatory requirements, FSAR commitments, and industry standards. Implementation of the design change control program for Unit 1 was determined to comply with the program's written procedures.

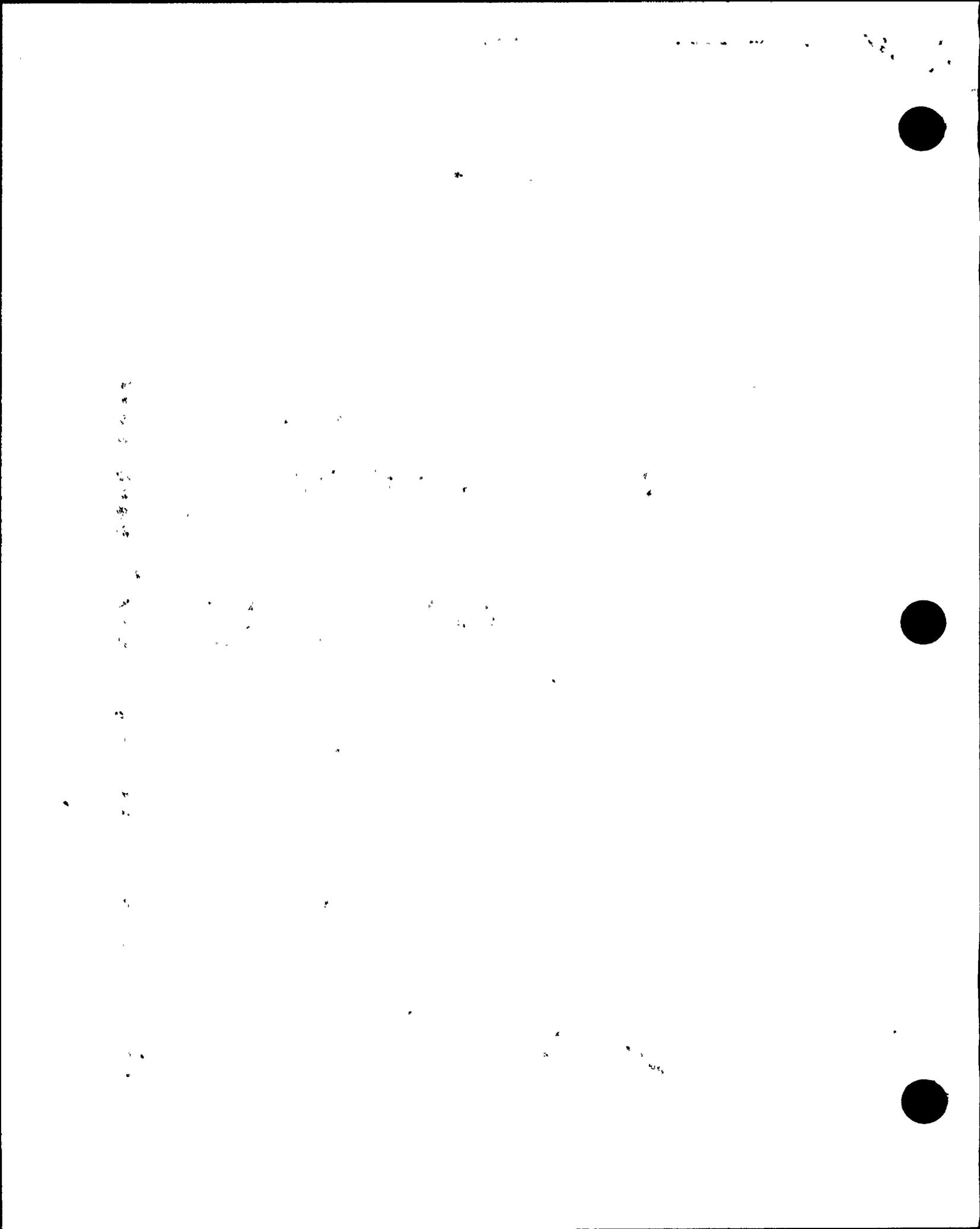
Although strength was perceived in some aspects of the program, there were program areas which warranted further management attention. The inspector observed that the following areas were in need of improvement: procedures for field changes, closeout of outstanding files, interpretation of 30 day criteria for issuing priority one drawing revisions, review of temporary priority one drawings for overdue revisions, and specific procedure guidance to conduct plant modifications involving multi-departmental activities.

K. Temporary Modifications, Lifted Leads and Jumpers

The inspector examined procedures and records for this area. The inspection team observed effective planning, control, and implementation.

L. Vendor Field and Technical Manual Change Notices

The inspector reviewed the administrative controls and plant records to determine whether the established programs effectively identify, control, schedule and implement vendor technical manual changes for modifications



required to equipment and whether technical manuals are controlled and maintained current in accordance with a document control program.

Adequate controls exist to update the technical manuals for changes identified by the Nuclear Industry, the NRC or PG&E as long as they are transmitted through the vendor that supplied the equipment and manuals. Site specific changes to plant equipment are being documented in plant procedures and drawings. However, additional effort will be required to update the site's technical manuals. The NRC's finding confirms that of a previous INPO audit, and the licensee stated that controls to address this issue were being developed.

M. Operating Staff Training

The inspector reviewed the site Training Programs for both licensed and non-licensed personnel to determine whether these programs are in conformance with the applicable regulatory requirements, licensee commitments and industry standards.

The inspector concluded that the training programs examined are adequate and implemented in accordance with applicable requirements, and that there is adequate management involvement and resources committed to meeting site training requirements.

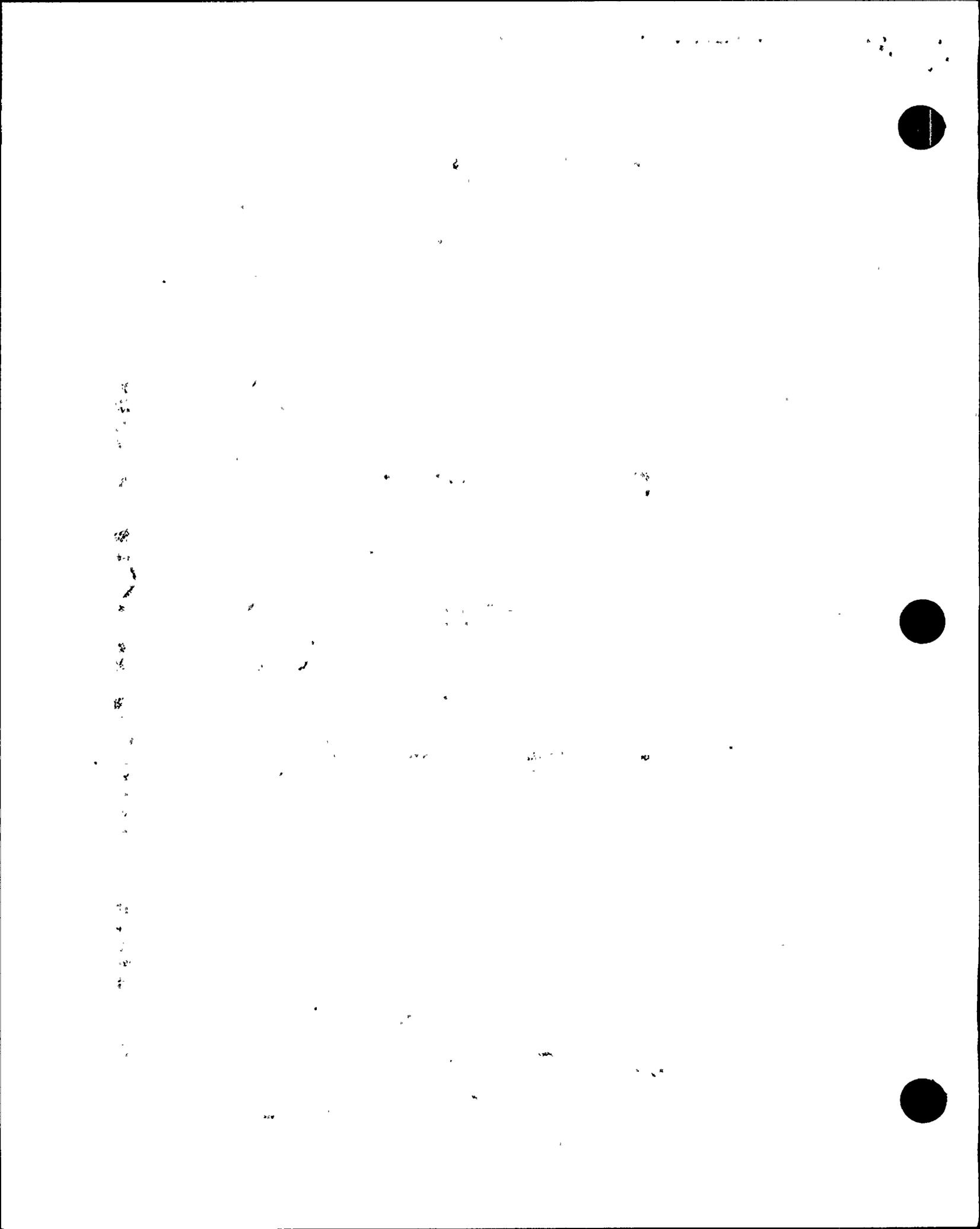
N. Radiation Surveys - Startup

The inspector verified that the various startup surveys performed for the purpose of evaluating the effectiveness of the biological shield were consistent with the licensee's commitments, procedures, and the FSAR.

O. Radiation Protection Program

An inspection was conducted for the purpose of ascertaining the performance of the radiation protection program. The examination identified several weaknesses, as follows:

- 1) Assessment of personnel exposures resulting from skin contamination occurrences are not currently considered by radiation protection procedures. The licensee indicated procedures will be revised accordingly to include the need for evaluating personnel exposures resulting from skin contaminations.
- 2) A failure of Chemistry and Radiation Protection Technicians to maintain and adhere to radiological control procedures was identified. This is a violation of the regulatory requirements.
- 3) Poor performance of the I&C and Chemistry and Radiation Protection organizations program related to test and calibration of portable radiation protection instrumentation was identified. This item was previously reported in Inspection Report 50-323/84-12. The licensee's commitments for improvement in this area, as described on memorandum MWS (69-3717) will be examined during a subsequent inspection.



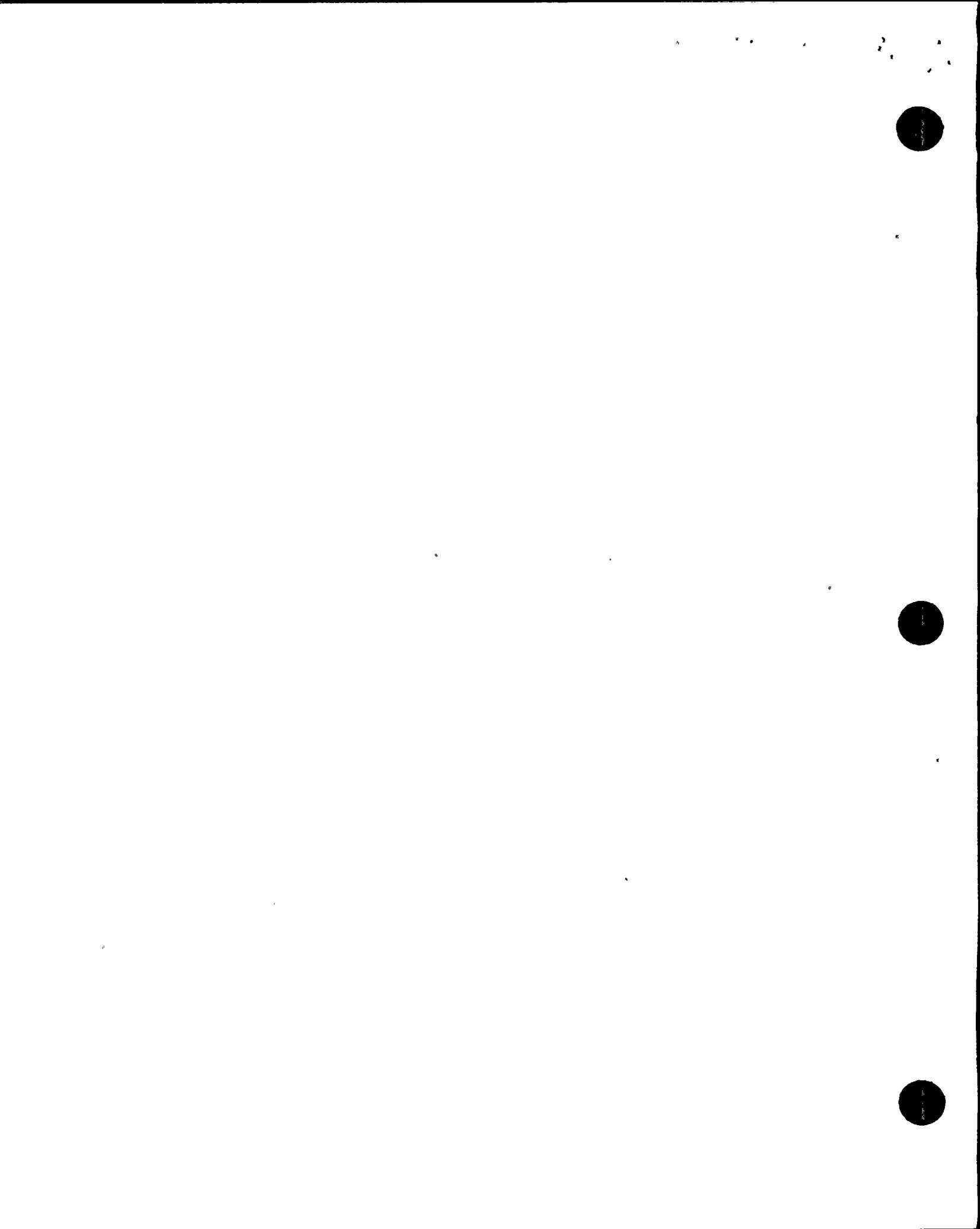
- 4) Work assignments of C&RPTs not meeting the qualifications stated in Section 6.3.1 of the Technical Specifications was identified. This a violation of the regulatory requirements.
- 5) Poor performance of the QA audit program in identification of weaknesses with the site's Chemistry and Radiation Protection Technician staff was indicated.

A review of technical specification surveillances for effluents, effluent monitors and chemistry parameters revealed only minor problems with I&C surveillance records. The surveillance checks of effluent monitors accomplished by the operations group appeared to be adequate. Semiannual and annual-reports examined were found satisfactory.

Based on the results of this inspection, it appears that three of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. Your response to the Notice of Violation (Appendix A) is to be submitted in accordance with the provisions of 10 CFR 2.201. In addition, please address your plans for evaluating and resolving the identified areas of perceived weakness.

NRC wants to encourage and support licensee initiatives for self-identification and correction of problems to the extent notices of violation will not generally be issued for violations that are: 1) identified by the licensee; 2) Severity Level IV or V; 3) reported if required; 4) subject to corrective actions taken including measures to prevent recurrence; and 5) not a violation that could reasonably be expected to have been prevented by corrective action for a previous violation. During this inspection we reviewed your actions related to failure of a Chemistry and Radiation Technician to perform radiation surveys on May 23, 1985, during a containment building entry with the reactor at full power as described in your Licensee Event Report No. 85-017. As a result of our review we became aware of a similar situation that occurred on June 13, 1985, where again a Chemistry and Radiation Protection Technician assigned responsibility to provide radiological surveillance for workers making a containment entry at full reactor power failed to perform radiation surveys required by your procedures. Accordingly, we find your corrective actions were not effective to prevent recurrence and have enclosed Item II in the attached Notice of Violation.

We expect that entries into the containment building with the reactor at full power will be accompanied by a responsible radiation protection technician in view of the wide variation in radiation exposure rates expected. In our effort to diagnose the root cause of why the June 13, 1985, violation occurred it was determined that the technician involved did not have adequate experience in the field of radiation protection to meet your Technical Specification requirements. Failure of your technicians to have at least two years of experience in the specialities of chemistry and radiation protection has been previously brought to your attention and is described in NRC Inspection Report No. 50-275/83-32. Accordingly, while you also recognized the technician failed to meet the qualification requirements, Item III has been included in the Notice of



AUG 06 1985

Violation since we believe the qualifications issue had been previously brought to your attention and effective corrective measures to prevent recurrence of the May 23, 1985, violation should have addressed qualification of the technician assigned to make containment entries at power.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, PL 96-511.

Should you have any questions concerning this inspection, we would be pleased to discuss them with you.

Sincerely, ^{Original signed by}
D. F. Kirsch
D. F. Kirsch, Acting Director
Division of Reactor Safety and
Projects

Enclosures:

- A. Notice of Violations
- B. Inspection Report
No. 50-275/85-23

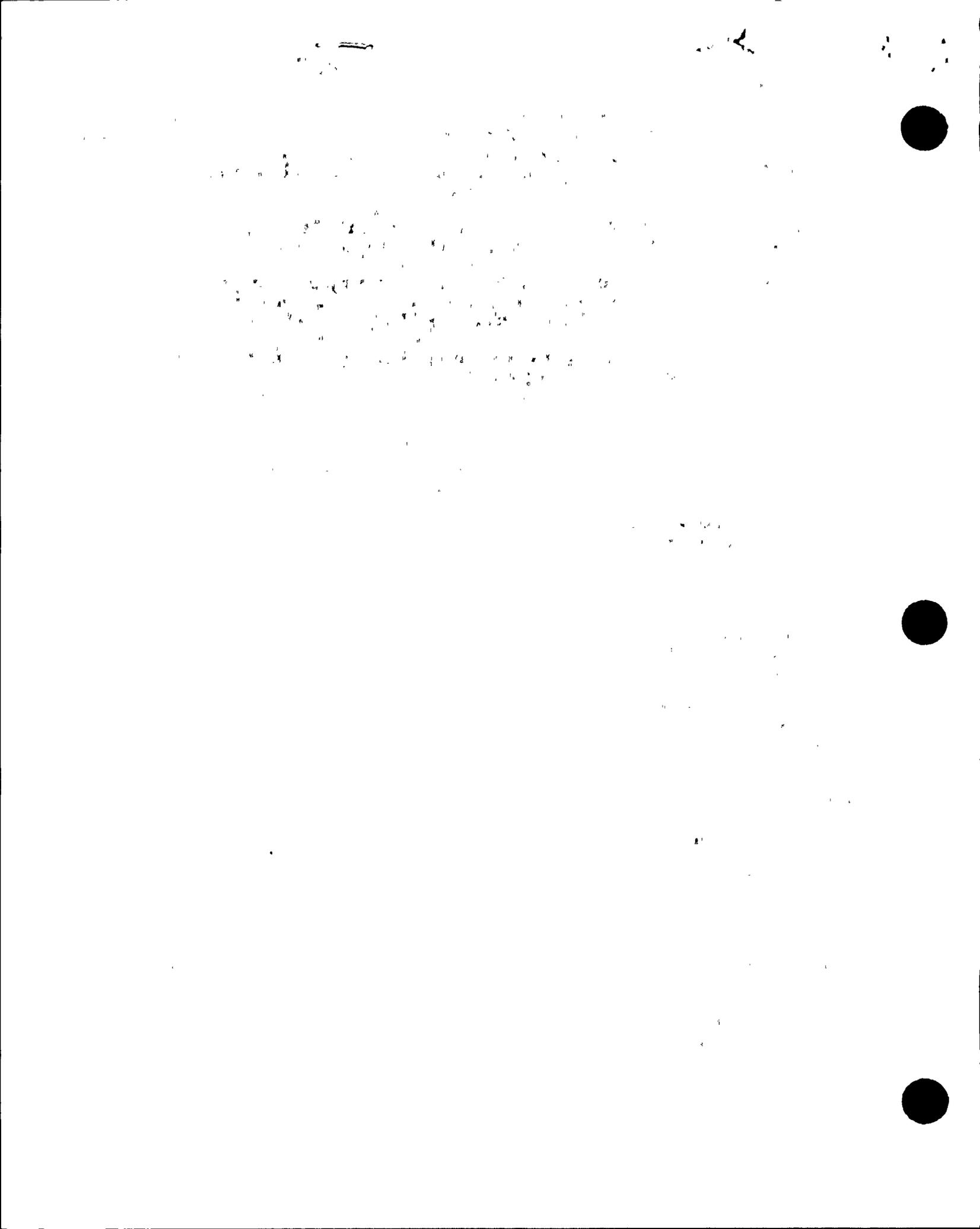
cc w/enc:

- James Partlow, IE
- Jim Knight, NRR
- S. D. Skidmore, PG&E
- R. C. Thornberry, Plant Manager
- P. A. Crane, PG&E
- D. Taggart, (Diablo Canyon)
- R. Weinberg, (Diablo Canyon)
- State of CA

cc w/enclosure B only:
Sandra Silver

bcc: RSB/Document Control Desk (RIDS)
Mr. J. Martin
Resident Inspector
Project Inspector
G. Cook, RV

RV	<i>[Signature]</i>						
AToth:dh	TYoung	JBurdoin	LKanow	GKellund	MMendonca	TRoss	JO'Brien
8/6/85	8/6/85	8/6/85	8/6/85	8/6/85	8/6/85	8/6/85	8/6/85
PStewart	MCillis	AJohnson	DKirsch				
8/6/85	8/6/85	8/6/85	8/6/85				



AUG 06 1985

qualification requirements, Item III has been included in the Notice of Violation since we believe the qualifications issue had been previously brought to your attention and effective corrective measures to prevent recurrence of the May 23, 1985, violation should have addressed qualification of the technician assigned to make containment entries at power.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, PL 96-511.

Should you have any questions concerning this inspection, we would be pleased to discuss them with you.

Sincerely, Original signed by
D. F. Kirsch
D. F. Kirsch, Acting Director
Division of Reactor Safety and
Projects

Enclosures:

- A. Notice of Violations
- B. Inspection Report
No. 50-275/85-23

cc w/enc:

- James Partlow, IE
- Jim Knight, NRR
- S. D. Skidmore, PG&E
- R. C. Thornberry, Plant Manager
- P. A. Crane, PG&E
- D. Taggart, (Diablo Canyon)
- R. Weinberg, (Diablo Canyon)
- State of CA

cc w/enclosure B only:
Sandra Silver

bcc: RSB/Document Control Desk (RIDS)
Mr. J. Martin
Resident Inspector
Project Inspector
G. Cook, RV

RV <i>RV</i>	<i>TY</i>	<i>JB</i>	<i>LK</i>	<i>GK</i>	<i>MM</i>	<i>TR</i>	<i>JO</i>
AToth:dh	TYoung	JBdoin	Lkanow	GKellund	MMendonca	TRoss	JO'Brien
7/30/85	7/30/85	7/30/85	7/30/85	7/30/85	7/30/85	7/30/85	7/30/85
<i>PS</i>	<i>MC</i>	<i>DK</i>	<i>A Johnson</i>		<i>RL</i>		
PStewart	MCillis	DKirsch	1/31/85		7/31/85		
7/30/85	7/30/85	7/31/85					

