

NOTICE OF VIOLATION

Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant

Docket Nos. 50-275 and 50-323
License Nos. DPR-80 and DRP-82

During an NRC inspection conducted on November 15 through December 19, 1987 violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. 10 CFR Part 50 Appendix B, criterion III, "Design Control" states, in part, that "Design Changes...shall be subject to design control measures commensurate with those applied to the original design and approved by the organization that performed the original design unless the applicant designates another responsible organization." In partial implementation of this requirement, Administrative Procedure C-1S1 Revision 3, "Onsite Review and Handling of Plant Modifications," in affect in April 1985, states: "This procedure describes the onsite handling, control, and implementation of Plant Modifications, including PSRC review, approval, inspection, acceptances, etc."

Contrary to the above, in April 1985, two differential pressure gauges were installed across the Unit 2 Residual Heat Removal Pumps without implementing Administrative Procedure C-1S1 Revision 3, or any other form of procedural control. As a result, the gauges remained in place until November 1987 following identification by the inspector.

This is a Severity Level IV Violation (Supplement I)

- B. Facility Technical Specification 6.8.1 states that: "Written procedures shall be established, implemented and maintained covering...applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978..." Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Section 1d; specified procedures for "Procedure Adherence and Temporary Change Method." In partial implementation of this requirement, Nuclear Plant Administrative Procedure E-4, "Procedures", in section 4.5.2, "Sequence of Steps", states in part: "A person shall not alter the sequences of steps without the required approval(s)..."

Contrary to the above, on November 13, 1987, the Unit 2 Shift Foreman did not complete step 8.13 to Surveillance Test Procedure P-3B which states: "Remove gauges temporarily installed for this test" prior to signing that the procedure had been completed. The Shift Foreman instead marked the step "N/A" and made a note in the Shift Foreman's Log that the Instrumentation and Control department had been requested to remove the gauges. The gauges were not removed until November 18 following identification by the inspector.

This is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit a written statement or explanation to the U.S.

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Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other actions as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

Dated at Walnut Creek, California
JAN 20 1988


R. P. Zimmerman, Chief
Reactor Projects Branch

