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Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 880311 ltr re violations noted in Insp Repts 50-275/88-04 & 50-323/88-03. Corrective actions: Surveillance Test Procedure V-3, "Exercising Safety-Related Valves General Procedure" revised to be consistent w/ASME code.

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James D. Shiffer
Vice President
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April 11, 1988

PG&E Letter No. DCL-88-082

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Reply to a Notice of Violation in
NRC Inspection Report 50-275/88-04 and 50-323/88-03

Gentlemen:

NRC Inspection Report 50-275/88-04 and 50-323/88-03, dated March 11, 1988, contained a Notice of Violation citing two Severity Level IV violations concerning the return to normal test frequency of a valve that had been placed on an accelerated test schedule and failure to establish the reference flowrate for a pump during testing. PG&E's response to this Notice of Violation is provided in the enclosure.

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

Sincerely,

J. D. Shiffer

cc: J. B. Martin
M. M. Mendonca
P. P. Narbut
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CPUC
Diablo Distribution

Enclosure

2031S/0056K/DJH/1991

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ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN NRC
INSPECTION REPORT 50-275/88-04 AND 50-323/88-03

On March 11, 1988, as part of NRC Inspection Report Nos. 50-275/88-04 and 50-323/88-03 (Inspection Report) for Diablo Canyon Power Plant (DCPP) Units 1 and 2, NRC Region V issued a Notice of Violation citing two Severity Level IV violations. The statements of violation and PG&E's responses are as follows:

A. STATEMENT OF VIOLATION

> Subsection IWV-3417 of Section XI of the ASME code states in part that, "If, for power operated valves, an increase in stroke time of ... 50% or more for valves with full-stroke times less than or equal to 10 sec is observed, test frequency shall be increased to once each month until correction action is taken, at which time the original test frequency shall be resumed."
>
> Contrary to the above, records for Unit 2 showed valve RCV-16 stroke time increased 141% on November 29, 1986 and the test frequency was increased to once each month. The original 92 days valve stroke time test frequency was resumed after May 4, 1987, without the performance of valve corrective action in the form of repair, replacement or detailed engineering analysis.
>
> This is a Severity Level IV violation (Supplement 1), applicable to Unit No. 2.

REASON FOR THE VIOLATION IF ADMITTED

As discussed in the inspection report, ASME Section XI Subsection IWV-3417(a) requires that if a valve stroke time increases by a specific

amount over the previous test, the test frequency shall be increased to once each month until corrective action is taken. However, PG&E used Subsection IWP-3230(c) for guidance as to what constitutes corrective action for return of the valve to its original test frequency when two subsequent tests indicate that the valve stroke time has stabilized at less than 90 percent of the stroke time limit. PG&E acknowledges that its practice of using Subsection IWP-3230(c) for guidance as to what constitutes corrective action to meet the requirements of Subsection IWV-3417(a) for an increase in valve stroke time is not consistent with the NRC's interpretation of Subsection IWV-3417(a) requirements.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The engineering justification for the return of RCV-16 to its original test frequency has been performed and documented. Surveillance test procedure (STP) V-3, "Exercising Safety Related Valves General Procedure," has been revised to be consistent with the current NRC interpretations of the ASME Section XI Subsection IWV-3417(a) requirements for corrective actions. STP V-3 now requires that an action request (AR) be initiated for any valve that is placed in the alert status to document corrective actions taken. This revision also requires that the test coordinator concur with any decision to return a valve from alert status to its original test frequency.

Also, better guidelines have been added to define the appropriate corrective action to be taken and to require that an engineering

evaluation be performed to document acceptability of the increase.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The STP V-3 revisions should be sufficient to ensure that the ASME Section XI Subsection IWV-3417(a) requirements are met.

An inspection of RCV-16 will be made during the next Unit 2 outage of sufficient duration to determine the cause of the stroke time increase.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is presently in full compliance. STP V-3 has been revised and Unit 2 RCV-16 will be inspected no later than the next Unit 2 refueling outage, currently scheduled for late 1988.

B. STATEMENT OF VIOLATION

Subsection IWP-3100 of Section XI of the ASME code states in part, "The resistance of the system shall be varied until ... the measured flow rate equals the corresponding reference value."

Contrary to the above, during the performance of the routine surveillance test of containment spray pump no. 1-1 (STP P-4B) on February 10, 1988, the reference flow rate of 300 ± 5 gpm was not established.

This is a Severity Level IV violation (Supplement 1), applicable to Unit No. 1.

REASON FOR THE VIOLATION IF ADMITTED

PG&E acknowledges that the violation occurred as described in the Inspection Report due to an inappropriate method (flow averaging) of interpreting the instrument response as meeting the specified reference flowrate. PG&E does not feel that this violation occurred as a result of failure to follow the procedure. Rather, the violation occurred because specific guidance from management as to the interpretation of instrument response and its acceptability has not generally been provided.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Based on a review of the circumstances of this event, it has been determined that rather than revise STP acceptance criteria, PG&E will develop a new administrative procedure to provide specific guidance to all appropriate plant personnel on the proper method of reading and interpreting test instruments.

An operations incident summary report has been issued to describe the circumstances of this violation and to detail the ASME Section XI requirement to establish a reference flowrate during pump testing. The report also directs Operations personnel to obtain assistance when readings on test instruments that do not indicate with sufficient precision or when a stable enough reading cannot be obtained to verify the limits specified in a surveillance test procedure.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Prior to this event, training on ASME Section XI IST surveillance testing requirements for operations was in preparation. This training will specifically include the significance of establishing procedure reference flowrate requirements during testing. As a result of this event, the previously planned training will be expedited. In addition, a new administrative procedure will be developed to provide guidance for reading and interpreting test instruments.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is presently in full compliance. The Section XI IST training for operations personnel will be completed by July 1, 1988. The administrative procedure for reading and interpreting test instruments will be completed by July 1, 1988.