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 ACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Gas 05000275
 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Gas 05000323
 AUTH. NAME: PATE, R.J. AUTHOR AFFILIATION: Region 5, Ofc of the Director
 RECIP. NAME: SHIFFER, J.D. RECIPIENT AFFILIATION: Pacific Gas & Electric Co.

SUBJECT: Ack receipt of 881107 ltr informing NRC of steps taken to correct deviations noted in Insp Rept 50-275/88-25.

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DEC - 2 1988

Docket Nos. 50-275 and 50-323

Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

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

Thank you for your letter dated November 7, 1988, in response to our Notice of Deviation and Inspection Report Nos. 50-275/88-25 and 50-323/88-23, dated October 6, 1988, informing us of the steps you have taken to correct the items which we brought to your attention. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

original signed
Robert J. Pate, Chief
Reactor Safety Branch

bcc w/copy of letter dated 11/7/88:

docket file
State of California

A. Johnson
G. Cook
B. Faulkenberry
J. Martin
Resident Inspector
Project Inspector
J. Zollicoffer
M. Smith

REGION V

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Pacific Gas and Electric Company

77 Beale Street
San Francisco CA 94106
415:972 7000
TWX 910 372 6587

James D. Shiffer
Vice President
Nuclear Power Generation

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REGION V

November 7, 1988

88 NOV 8 AID: 39

PG&E Letter No. DCL-88-265



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 Notice of Deviation in NRC Inspection
Report Nos. 50-275/88-25 and 50-323/88-23

Gentlemen:

NRC Inspection Report Nos. 50-275/88-25 and 50-323/88-23 (Inspection Report), dated October 6, 1988, contained a Notice of Deviation regarding completion of a commitment to the NRC. PG&E's reply to this Notice of Deviation is provided in Enclosure 1.

The letter forwarding the Inspection Report also identified a concern regarding the effectiveness of tracking open NRC inspection issues. PG&E has reviewed this concern and taken actions to address this concern as described in Enclosure 2.

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
B. Norton
H. Rood
B. H. Vogler
CPUC
Diablo Distribution

Enclosures

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8841/50254 Ugn.



ENCLOSURE 1

REPLY TO NOTICE OF DEVIATION IN NRC
INSPECTION REPORT NOS. 50-275/88-25 AND 50-323/88-23

On October 6, 1988, as part of NRC Inspection Report No. 50-275/88-25 and 50-323/88-23 (Inspection Report) for Diablo Canyon Power Plant (DCPP) Units 1 and 2, NRC Region V issued a Notice of Deviation. The statement of deviation and PG&E's response is as follows:

A. STATEMENT OF DEVIATION

The Diablo Canyon Reply (PG&E Letter No. DCL-88-082, dated April 11, 1988) to a Notice of Violation in NRC Inspection Report 50-275/88-04 and 50-323/88-03, stated in Section B under 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."

Contrary to the above, at the time of the Inspection, an administrative procedure for reading and interpreting test instruments had not been issued.

This is a deviation.

REASON FOR THE DEVIATION IF ADMITTED

PG&E agrees that the deviation occurred as described in the Inspection Report. In response to the Notice of Violation in NRC Inspection Report 50-275/88-04 and 50-323/88-03, the DCPP Engineering Department submitted Administrative Procedure AP C-3S3, "Dealing with Gauge Oscillations During the Performance of ASME Section XI Required Tests," to the Plant Staff Review Committee (PSRC) for approval before the required due date of July 1, 1988. The PSRC reviewed this procedure and determined it did not provide sufficient guidance to operators and technicians performing ASME Section XI testing. The procedure was returned to Engineering to incorporate the PSRC's comments.

The resulting rewrite to AP C-3S3 precluded its issuance in time to meet the July 1 commitment date. In the interim, on July 1, 1988, the PSRC approved Operating Order, OP O-18, "Adjustment of Instrument Valves." The Operating Order adopted ASME Section XI inservice testing guidance for adjusting instrument root valves to reduce gauge oscillations to within $\pm 2\%$ of the indicated range. It was felt that the Operating Order met the intent of the commitment made in PG&E's NOV response, DCL-88-082, dated April 1, 1988, and was sufficient until the administrative procedure could be rewritten to address PSRC comments. After reviewing OP O-18 with the NRC inspector on September 8, 1988, it was determined that this procedure did not



meet the full intent of the inspector's concerns. While the procedure provided guidance to plant personnel for gauges found oscillating more than $\pm 2\%$ of indicated range, this guidance could be misinterpreted as the indicated range of the gauge instead of $\pm 2\%$ of the reading's midpoint.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

On September 23, 1988, Administrative Procedure AP C-3S3 was issued for use and OP 0-18 was rescinded.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

PG&E believes that it is important to timely and accurately meet its regulatory commitments with the NRC. To provide further assurance that NRC commitment dates are met, the following corrective actions will be implemented:

1. To communicate NPG's policy to meet regulatory commitments, a memo from the Vice President of NPG to all NPG personnel will be sent to reemphasize the importance of meeting regulatory commitments and the responsibility of management to assure actions are timely and complete.
2. The procedures associated with tracking NRC commitments will be revised to require that actions taken to respond to NRC commitments will be reviewed prior to the actual due date. If it is determined that the actions to close the commitment are insufficient to either (1) meet the required schedule or (2) provide the adequate scope to meet the commitment requirements, it will be brought to the proper level of management (e.g. Assistant Plant Managers, Plant Manager, VP-NPG) to ensure proper completion.
3. PG&E's PSRC and plant management will review this deviation in the next plant staff meeting. Managers will be directed to take actions that ensure responses to NRC commitments are timely and meet the intent of the commitment.
4. To ensure regulatory commitments are reviewed with plant management in a timely manner, commitments that are scheduled to be completed within the coming two week period will be reviewed each Monday during the plant managers meeting. This review will focus management's attention on regulatory commitments to ensure they are completed in a timely manner.

DATE WHEN CORRECTIVE ACTIONS WILL BE COMPLETED

A memo from the Vice President of NPG to all NPG personnel reemphasizing the importance of meeting regulatory commitments, and the ramifications if they are not met, will be issued by December 1, 1988.

By February 1, 1989 a review of procedures associated with tracking NRC commitments will be completed and the procedures revised to require the proper level of management be informed when actions to resolve the commitment are insufficient.

ENCLOSURE 2

RESPONSE TO NRC CONCERN IDENTIFIED IN
NRC INSPECTION REPORT
50-275/88-25 AND 50-323/88-23

STATEMENT OF CONCERN:

The letter forwarding the Inspection Report identified an NRC concern that PG&E's action item tracking system for outstanding inspection issues is often ineffective in ensuring the complete and timely follow-up of open issues.

PG&E RESPONSES:

PG&E agrees that a more formalized program for tracking and resolution of NRC inspection issues, particularly those identified in NRC inspection reports as open or unresolved inspection issues, needs to be developed. The tracking and providing of closure documentation was being done on an informal basis. A program is being established to formally review, identify, track, and provide closure documentation for these type of inspection report issues. An Administrative Procedure, AP C-54, "Handling of NRC Inspection Reports," has been drafted to establish a consistent methodology for handling NRC inspection report open issues. This draft procedure is currently being reviewed by management prior to review and approval by the PSRC. Periodic status reports of open inspection items are provided to management for information and action, as appropriate.

