

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos: 50-275/89-10 and 50-323/89-10

Docket Nos: 50-275 and 50-323

License Nos: DPR-80 and DPR-82

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

Facility Name: Diablo Canyon Units 1 and 2

Inspection at: Region V Offices

Meeting Conducted: February 24, 1989

Attendees:

S. A. Richards
S. A. Richards, Chief, Engineering Section

3/8/89
Date Signed

M. M. Mendonca
M. M. Mendonca, Chief
Reactor Projects Section I

3/8/89
Date Signed

Approved by:

M. M. Mendonca
M. M. Mendonca, Chief
Reactor Projects Section I

3/8/89
Date Signed

Summary:

Meeting on February 24, 1989 (Report Nos. 50-275/89-10 and 50-323/89-10)

Areas Discussed: The meeting consisted of a meeting to discuss engineering-related inspection activities. Inspection Procedure 30702 was used as guidance during this inspection.

8903270148 90308
PDR ADOCK 05000275
8 PIC



DETAILS

1. Attendees

Pacific Gas and Electric Company

S. M. Skidmore, Manager Quality Assurance
C. O. Koffer, Supervising Engineer for Nuclear Regulatory Affairs
G. W. Heggli, Senior QA Engineer for Technical Auditors

United State Nuclear Regulatory Commission

M. M. Mendonca, Chief, Projects Section I
S. A. Richards, Chief, Engineering Section.

2. Meeting Minutes

The meeting began at approximately 10:30 a.m. in the Region V conference room. Mr. Skidmore started by describing some potential organizational considerations to strengthen the engineering inspection efforts by the Quality Assurance Department. These considerations could entail combining the licensee's Safety System Functional Audit and Review (SSFAR) and Safety System Outage Modification Inspection (SSOMI) efforts under one organization or location. Mr. Skidmore indicated that he was investigating how best to continue and "capitalize" on these inspection efforts.

Mr. Skidmore then described plans for continuing SSFAR inspections. Specifically, the SSFAR on the electrical system would be completed on about April 7, 1989, and the next SSFAR may be on the Component Cooling Water System or the Auxiliary Feedwater System (AFW). Mr. Skidmore indicated that the AFW may be preferable since an initial design basis document had been completed for AFW.

Next, Mr. Skidmore indicated that this meeting was to serve as a feedback session so that they could assure they understood the NRC's position and philosophy for their SSFARs and SSOMIs. Mr. Skidmore then presented a viewgraph to aid in the discussion (attachment 1).

Mr. Richards indicated that although the NRC encourages such engineering based inspections, these type of inspections are not based on regulatory requirements. Mr. Skidmore indicated that they were committed to themselves to perform these inspections.

Mr. Skidmore then directed the group to the attachment to discuss the NRC's perceptions on the most recent Safety System Functional Inspection overview (this viewgraph was used in the exit meeting). Mr. Mendonca indicated that the first comment on the viewgraph relates to the licensee assuring that their SSFAR and SSOMI efforts should be highly engineering oriented and not simply compliance oriented.

The discussion then lead into the second item on the viewgraph, i.e., design experience level needed for SSFAR and SSOMI participants. Mr. Skidmore indicated that the licensee had changed contractors to aid in



the SSFAR and SSOMI efforts. These contractors are to "shadow" licensee participants in the SSFARs and SSOMIs and provide additional engineering expertise. Mr. Heggli indicated that this use of contractors was an indication of managements' commitment to the programs. Mr. Richards pointed out that the SSFAR and SSOMI participants should be as critical as possible and develop instincts to assure a sound engineering approach is used.

Mr. Koffer asked a question related to the third item in the viewgraph on questioning the licensing basis. Mr. Mendonca responded that the technical adequacy of the licensing basis should not be assumed. The discussion led to some examples: the earthquake design basis is subject of a separate review and need not be questioned on that basis. However, the recent NRC SSFI team findings on Auxiliary Saltwater, and Component Cooling Water Systems design adequacies are the type that should be questioned. Based on the results of other team inspections, Mr. Richards commented on the importance of understanding and documenting the design bases. Also, Mr. Richards pointed out that even if the NRC accepted some licensing basis, the SSFAR and SSOMI efforts should not automatically assume that the licensing basis is appropriate and Mr. Mendonca reemphasized that the SSFAR and SSOMI efforts should question the technical adequacy of design bases and assumptions.

Mr. Heggli then asked questions relating to the composition of the SSFAR and SSOMI teams. Mr. Mendonca indicated that in the selection of the NRC teams for similar efforts, a significant emphasis was placed on establishing a balanced team, and Mr. Richards indicated that team size was also an important aspect. Mr. Skidmore indicated that they understood these points and were trying to consider them in their efforts.

Mr. Skidmore further indicated that they were continuing to press in the areas of root cause training, and timeliness of responses and reportability of problems. Mr. Skidmore indicated that the licensee was vigorously addressing the issues from the NRC's SSFI overview inspection.

Based on consensus of the meeting participants, the previous discussion provided adequate understanding of the fourth through sixth items in the viewgraph. That is: assure review efforts are not solely compliance oriented but provide technical evaluation of systems; follow problems to their source and assure proper corrective actions; and assure that all root causes of a problem were identified.

This completed the discussions on the viewgraph, and Mr. Skidmore indicated that he wanted to discuss the licensee's and industry's effort in the procurement area. Specifically, the work with a related NUMARC committee had generated a "white paper" to address some of the problems in the procurement of material. For example: vendor audits are to be more hardware/performance oriented; communications within the industry is to be improved; cooperation between vendors and customers to improve products; and increased inspection of materials.

The meeting was then concluded at approximately 12:30 p.m.



SSFAR/SSOMI

Reason's for Not Finding Problems

Lack of Technical Evaluation of Engineering Work

Teams Members Do Not Have Expertise to Evaluate or Question Engineering Activities/Calculations

Teams Do Not Question Licensing Design/Documents or FSAR Commitments or Design Procedures

Team Reviews Start with Basic Assumption of Design Adequacy and verifies Adequacy with Compliance Review

Failure to Follow the Problem Back to its Source

Lack of Depth; ie, Stopped at First Problem Rather Than Consider Subsequent or Generic Implications

