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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSIO FACIL:5 AUTH.N MARBURG SHIFFER RECIP.	N NBR:8903300158 0-275 Diablo Canyo AME AUTHOR ER,D.C. Pacific ,J.D. Pacific NAME RECIPIE	DOC.DATE: n Nuclear Po AFFILIATION Gas & Electr Gas & Electr NT AFFILIATI	89/03/24 NOTARIZE wer Plant, Unit 1, ic Co. ic Co. ON	D: NO DOCKI Pacific Ga 05000	3T #)275
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SUBJECT	: LER 84-040-00:on requirements not	840720,CCW incorporate	& ASW sys design b d into plant proce	asis dures. W/8 ltr.	I
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LICENSEE EVENT REPORT (LER)							
PACILITY NAME (1) DIABLO CANYON UNIT 1	DECRET MUNITA () PAGE (3						
TITLE ACK AND ASK SYSTEMS DESIGN BASIS REQUIREMENTS NOT INCOM	PORATED INTO PLANT PROCEDURES DUE						
EVENT BATE INI LER NUMBER INI REPORT DATE (7)	BTHER FACILITIES MYDLVED BI						
Diablo Canyon U	nit 2 01510101013 2 3						
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OPERATING THE REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 19 CFR 5 (11)							
$r_{1}^{\text{powers}} = \frac{50.73(a)(2)(11)(B)}{2}$							
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DAVID C. MARBURGER, REGULATORY COMPLIANCE ENGINEER	78680-246 400860						
	. 8°°0°°3°15 9 5 - 4 5 5 4						
COMPLETE DHE LINS FOR EACH COMPONENT FAILURE DESCRIBED IN	THE REPORT (13)						
CAUSE FYETEW COMPONENT MANUFAC REPORTABLE CAUSE EVEREN COMPONENT	MANUFAC REPORTABLE TO WARDS						
	Batteria Dar Veas						
YES IIT IN COMPANY EXPECTED SUBMISSION DATES	DATE IS						
On February 22, 1989, at 1615 hours PST, DCPP determined that engineering recommendations for plant operation to assure compliance with the design basis for the CCW system and the ASW system were not incorporated in plant operating and emergency procedures. This resulted in a lack of detailed procedural guidance to assure that DCPP would remain within design requirements under all conditions. A one hour non-emergency notification was made on February 22, 1989, at 1615 hours PST, in accordance with 10 CFR 50.72 (b)(1)(ii)(B).							
Operating requirements to ensure compliance with the C bases were identified by Engineering. The plant proce incorporate these requirements. Appropriate plant pro February 2, 1989, to implement these requirements.	CW and ASW systems design dures were not revised to cedures were revised on						
The root cause of this event is inadequate tracking of correspondence and communication specific to engineering on plant operation.	resolution for ng design basis constraints						
To prevent recurrence, correspondence files and operat reviewed to ensure engineering constraints on plant op incorporated into plant procedures. An expeditious re- performed by June 30, 1989, to ensure design bases sum implemented in plant procedures. A detailed review of performed to assure proper incorporation of appropriate applicable Engineering procedure will be revised to pro- communicating information to the plant.	ing procedures will be erations have been view of the FSAR will be marized in the FSAR are plant procedures will be e system design bases. The ovide instructions for						
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	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED ONE EXPIRES 8/31/88						
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	TEXT IN more space is required, use additional NRC Form 305A's/(17)		* <u>***</u> *		•		

I. <u>Initial Conditions</u>

Both Units 1 and 2 have operated in various modes and at various power levels without procedural guidance to place the second CCW heat exchanger in service (1) following a LOCA or (2) in the event a bus F or G CCW pump was removed from service.

II. <u>Description of Event</u>

- A. Event:
 - 1. Background

The performance of the Component Cooling Water (CCW) System (CC) has been analyzed for accident response under various combinations of heat loads, component alignments and water temperatures.

Acceptance criteria were established for the peak temperature of the CCW water temperature. To satisfy the acceptance criteria, certain actions are required by the operator in order to be consistent with the assumptions used in the calculations and to keep the CCW temperature within specified limits. This information was provided by two Engineering letters dated January 3, 1984, and February 14, 1984.

2. January 3, 1984 letter.

1 1 1

On January 3, 1984, an Engineering letter was issued to Nuclear Plant Operations (NPO) regarding CCW temperature criteria to assure compliance with the design basis. This letter was based on a worst case CCW heat load resulting from the single failure loss of one Auxiliary Saltwater (ASW)(BS)(P) pump with all safeguards and vital buses active following a LOCA. The CCW temperatures did not exceed 132°F peak; however, at the end of 20 minutes CCW temperature remained above 120°F. To ensure that CCW temperature returns below 120°F, the operator is required to reduce the heat load or to add more cooling capacity within 20 minutes. 2

This requirement and the calculation results were submitted to the NRC on April 4, 1983 and are documented in the Diablo Canyon Power Plant (DCPP) Safety Evaluation Report (SER) Supplement 16, pages 9-5, 6, and 7, August, 1983, and in the Final Safety Analysis Report (FSAR) Update page 9.2-5. The procedural requirement to take action to reduce CCW temperature is contained in Annunciator Response Procedure PKO1-06, "CCW Vital Header A-B," which directs the operators to place a second CCW heat exchanger in service on high CCW water temperature. However, this action was not included in appropriate plant operating and emergency procedures.

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NRC Form 366A (9-83)	LICENSEE EVENT REPOR	T (LER) TEXT CONTINU	U.S. NUCLEAR REGUL. JATION APPROVED OMB EXPIRES \$/31/26	ATORY COMMISSIO NO 3150-0104
FACILITY NAME (1)		DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
DIABLO CANYON	UNIT 1	0 5 0 0 0 2 7 5	8 4 - 04 0 - 000 0	3 _{0F} 0
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-				
3.	February 14, 1984, let	tter.		
	On October 27, 1983, a indicating that in a (was out of service for exchanger (HX) should system provides suffic with concurrent failur would make a second CC isolation of the non-v	an Engineering lette condition where eith greater than 72 ho be placed in servic cient cooling to var e of vital bus H (E CW pump inoperable a vital "C" header.	r was written to NPO er CCW pump (P) 1-1 or 1 urs, the second CCW heat e to assure that the CCW ious components upon a L B)(BU). Failure of bus nd would prevent automat	-2 I OCA H iic
	This information was i NPO to the plant. Thi (OP) F-2, "Component ((EP) OP-1, "Loss of Co be modified to accompl	ncorporated in a Fe s letter recommende Cooling Water System Dolant Accident," an lish the intent of t	bruary 14, 1984 letter f d that Operating Procedu ," and Emergency Procedu d EP OP-11, "Loss of CCW he October 27, 1983 lett	from Tre Tres I," Ter.
4.	Event.			
	On July 20, 1984, Unit The plant procedures of by the Engineering let	t l initiallý entere Jid not reflect the tters.	d Mode 3 (Hot Shutdown). operator actions recomme	nded .
5.	Discovery and Initial	Report to NRC.		
	On January 26, 1989, 1 Operations had revised February 14, 1984.	the NRC SSFI/SSOMI T j procedures as reco	eam questioned whether mmended by the NPO lette	er of
	On January 27, 1989, (and emergency procedur transmitted in the NPC also identified the Ja had transmitted criter to NPO. The January 3 these criteria were no	Dperations determine res had not incorpor D February 14, 1984 anuary 3, 1984 Proje ria for the operatio 3, 1984, letter was ot incorporated in p	ed that the plant operati ated the recommendations letter. The investigati ect Engineering letter wh on of the CCW and ASW sys not sent to the plant, a plant operating procedure	ng on nich stems nd es.
	On February 2, 1989, 1 Safety Injection," Op Saltwater System - Two interfacing procedures information.	Emergency Procedure erating Procedure OP o CCW Heat Exchanger s were revised to in	EP E-O, "Reactor Trip or P E-5:II, "Auxiliary Operation," and other Iclude the recommended	
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NRC Form 366 A 9631 -		LICENSEE EVENT REF	PORT (LER) TEXT CONTIN	UATION U.	E NUCLEAR RE APPROVED (EXPIRES 8'3	GULATORY COMMIS DMB NO 3150-0104 1/88
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DIABLO CAN	IYON	UNIT 1			0 0 0	0 4 $0F$ 0
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		A Nonconformance Re (TRG) met on Februa operating requirement the ASW and CCW system procedures, resultind DCPP would remain we i.e., there were not heat exchanger into one ASW pump is out removed from service	port was written and a ary 22, 1989. The TRG ents to assure complian items had not been inco ng in a lack of proced within design requireme o directions to the ope o service, within 20 mi c of service or when a ce.	Technical Rev determined that ce with the de orporated into lural guidance ents under all erator to place nutes followin bus F or G CCM	iew Grou t the sign bas plant to assur conditio a secor g a LOCA I pump is	ip es for re that ons, nd CCW When
		A one hour non-emer February 22, 1989,	gency notification was in accordance with 10	made at 1639 CFR 50.72 (b)(hours PS 1)(ii)(E	ST on 3).
Β.	Inc eve	operable structures, ent:	components, or systems	that contribu	ited to 1	:he
	Nor	ne				
с.	Dat	tes and approximate t	imes for major occurre	nces:		
	1.	August, 1983:	Safety Evaluation Rep issued.	ort (SER) Supp	lement l	6 was
	2.	October 27, 1983:	Engineering letter to	NPO.		
	3.	January 3, 1984:	Engineering letter to operating requirement the design bases for	NPO which tra s to assure co the CCW and AS	nsmittec mpliance W system	e with ns.
	4.	February 14, 1984:	NPO letter to the pla plant procedures, as October 27, 1983 Engi	nt recommendin identified by neering letter	g revisi the	on of
	5.	July 20, 1984:	Event DateInitial e Mode 3.	ntry of DCPP L	Init 1 ir	ito ·
•	6.	January 26, 1989:	The NRC SSFI/SSOMI Te Operations had revise by NPO letter of Febr	am questioned d procedures a uary 14, 1984.	whether s recomm	nended
•	7.	January 27, 1989:	Operations identified recommendation had no plant procedures.	that the Febr t been incorpo	uary 14, prated in	1984, to the

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 N UNIT 1 February 2, 1989: . February 22, 1989: at 1615 hours PST February 22, 1989: at 1639 hours PST Other systems or second one. 	Procedures EP E-O and O interfacing procedures the recommended informa Discovery Date - It was a lack of procedural gu would remain within des conditions. One hour notification w accordance with 10 CFR	LER NUMBER (5) An SEQUENTIAL ALVISION 4 0 4 0 0 0 0 5 0F 0 P E-5:II and other were revised to include tion. determined that there was idance to assure that DCPP ign requirements under all as made to the NRC in 50.72 (b)(1)(ii)(B).
 N UNIT 1 February 2, 1989: . February 22, 1989: . Tother systems or second lone. 	Procedures EP E-O and O interfacing procedures the recommended informa Discovery Date - It was a lack of procedural gu would remain within des conditions. One hour notification w accordance with 10 CFR	P E-5:II and other were revised to include tion. determined that there was idance to assure that DCPP ign requirements under all as made to the NRC in 50.72 (b)(1)(ii)(B).
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 February 2, 1989: February 22, 1989: at 1615 hours PST February 22, 1989: at 1639 hours PST Other systems or second ione. 	Procedures EP E-O and O interfacing procedures the recommended informa Discovery Date - It was a lack of procedural gu would remain within des conditions. One hour notification w accordance with 10 CFR	P E-5:II and other were revised to include tion. determined that there was idance to assure that DCPP ign requirements under all as made to the NRC in 50.72 (b)(1)(ii)(B).
 February 22, 1989: at 1615 hours PST February 22, 1989: at 1639 hours PST Other systems or second ione. 	Discovery Date - It was a lack of procedural gu would remain within des conditions. One hour notification w accordance with 10 CFR lary functions affected.	determined that there was idance to assure that DCPP ign requirements under all as made to the NRC in 50.72 (b)(1)(ii)(B).
10. February 22, 1989: at 1639 hours PST Other systems or second None.	One hour notification w accordance with 10 CFR lary functions affected.	as made to the NRC in 50.72 (b)(1)(ii)(B).
Other systems or second lone.	lary functions affected.	
lone.		
lethod of discovery:		
During the January, 198 February 14, 1984, NPO the appropriate plant p investigation showed th incorporated into the p identified during the i the letters, license ba the plant operating and appropriate actions in	9, NRC SSFI/SSOMI Team is letter was reviewed and procedures had been reviewed at the letter information procedures. The January nvestigation. A TRG sub sis and design basis wer emergency procedures di accordance with the basis	nspection, the Operations was asked if wed. Subsequent n had not been 3, 1984, letter was sequently determined that e mutually consistent and d not specify the S.
perator actions:		
lone.		1
Safety system responses	:	•
lone.		
<u>of Event</u>	•	
Immediate Cause:		
Dperating requirements CCW and ASW systems wer letters to NPO. Howeve incorporated in the app	to assure compliance wit e established by Enginee er, the recommendations o propriate plant operating	h the design bases for the ring and transmitted by f_the letters were not and emergency procedures.
	February 14, 1984, NPO the appropriate plant p investigation showed the ncorporated into the p dentified during the i the letters, license back the plant operating and operator actions: lone. Safety system responses lone. <u>of Event</u> immediate Cause: Operating requirements CCW and ASW systems wer letters to NPO. However incorporated in the app	Tebruary 14, 1984, NPO letter was reviewed and the appropriate plant procedures had been revie investigation showed that the letter informatio incorporated into the procedures. The January dentified during the investigation. A TRG sub the letters, license basis and design basis wer the plant operating and emergency procedures di appropriate actions in accordance with the basi operator actions: None. Safety system responses: None. Of Event Emmediate Cause: Operating requirements to assure compliance wit CCW and ASW systems were established by Enginee etters to NPO. However, the recommendations o incorporated in the appropriate plant operating

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LICENSE	PORT (LER) TEXT CONTINU	DION .	U.S NUCLEAR REC APPROVED O EXPIRES 8'31	ULATORY COMMISSION M8 NO 3150-0104 188
FACILITY NAME (1)	DOCKET NUMBER 121	LER NUMB	EA (6)	PAGE 13
		YEAR SEQUEN	TIAL REVISION	
DIABLO CANYON UNIT 1	275	8 4 0 4	0 0 0	0 6 0 9

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B. Root Cause:

The root cause was determined to be inadequate tracking of resolution of correspondence and communications specific to engineering design basis constraints on plant operations. The tracking methods governed only design information related to hardware and did not apply for design basis (non-hardware) related subjects.

IV. Analysis of Event

The CCW system supplies cooling to a number of Engineered Safety Features (ESF) equipment including the containment fan cooler units (CFCU)(BK)(CLR) and cooling for the ECCS motors and pumps.

Following a LOCA, the CFCU heat load increases in response to increased containment temperature. This causes increased temperature of the CCW water leaving the heat exchanger. The amount of increase is of concern as the CCW system is still supplying cooling flow to safety related components other than the CFCUs. Acceptance criteria are established to define the limit of the increase which can be accepted by these other components without impairment of their function.

The ASW system provides transfer of heat from the CCW heat exchangers to the ultimate heat sink. Consequently the configuration of the two systems is intertied and directly affects their performance and the operation of the two systems is closely interrelated. CCW and ASW performance is evaluated to show the expected maximum temperatures reached for various assumed parameters.

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Technical Specification (TS) 3.7.12, "Ultimate Heat Sink," requires that if the ASW temperature were to increase to 64°F, the second CCW heat exchanger must be placed in service for continued plant operation.

As described in Section II, Description of Event, there are two Engineering letters which identified actions to be taken regarding:

- A loss of an ASW pump during a LOCA and
- A CCW pump being out of service.

These are discussed as follows.

Loss of ASW Pump

An analysis performed by Westinghouse in 1983 concluded that a single failure of an ASW pump coincident with a LOCA would result in CCW temperatures that

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LICENSE VENT REPOR	LICENSE VENT REPORT (LER) TEXT CONTINUTION					
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require operator action within 20 minutes (i.e., place a second CCW heat exchanger into service). However, a refined analysis performed by PG&E Nuclear Engineering and Construction Services (NECS) and Westinghouse (letter PGE 89-570, February 16, 1989) shows that the CCW temperature does not rise beyond the limits of operation of the cooled ESF components for the condition of one heat exchanger and one ASW pump in operation; with ASW temperature of 64°F; with ASW flow of 10,500 gallons per minute; and with initial CCW water temperature of 75°F. These limits should not be exceeded in plant operation.

CCW Pump Out of Service

PG&E calculation No. M-464, dated August 17, 1983, concluded that for one CCW pump and one CCW heat exchanger in operation and the non vital "C" CCW header not isolated, the CCW flow supplied to the safety related equipment is reduced to approximately 75 percent of design flow until operator action can be taken to manually isolate the "C" header (reference: February 14, 1983 NPO letter).

The February 14, 1983, letter requested that a second CCW heat exchanger be put in service in the event that CCW pumps 1-1 or 1-2 were out of service. This would assure sufficient cooling to the vital components. This requirement was not reflected in plant operating procedures and, as a result, there have been instances where a CCW pump was out of service with one operating CCW heat exchanger.

Based on an assessment performed by Westinghouse, with one CCW pump supplying all three CCW headers the maximum CCW temperature will peak at less than 132°F and will reduce to less than 120°F within 20 minutes. Further, this preliminary Westinghouse assessment concluded that the FSAR containment integrity analysis remained valid.

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Although the effect of the short term reduced CCW flow was not quantitatively evaluated for all individual components, the probability of a concurrent loss of coolant accident, loss of bus H, and a high sea water temperature, is low. Further, a review of 1987 and 1988 clearance records determined that the bus F and G CCW pumps out-of-service time during operation was low. Therefore, the probability of a concurrent LOCA, a bus F or G CCW pump being taken out of service, high sea water temperature, loss of bus H, and failure of a safety related component due to the short term reduction in flow, was very low.

Therefore, although DCPP was operated without the recommended procedure changes, based on the above, there was no compromise to the safe operation of the plant. Accordingly, the health and safety of the public were not affected by this event.

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(9-83)	LICENSEE EVENT P	REPORT (LER) TEXT CONTINUATION	US NUCLEAR REGULATORY COMMI APPROVED OMB NO 3150-0104 EXPIRES 8/31/88
DIABLO C	ANYON UNIT 1	DOCKET NUMBER (2)	NUMBER (6) PAGE (3) EQUENTIAL AEVISION NUMBER 0 4 0 0 0 8 0
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V. <u>Co</u>	rrective Actions		
Α.	Immediate Corrective	Actions:	
	 Changes were made procedures as fol 	e on February 2, 1989, to appropr llows:	iate plant
	a. Emergency Pr has been rev started foll operator is service in a "Auxiliary S	rocedure EP E-O, "Reactor Trip or vised to add a new step to verify lowing a safety injection. If on instructed to place the second C accordance with operating procedu Saltwater System-Two CCW Heat Exc	Safety Injection," that both ASW pumps e pump starts, the CW heat exchanger in re E-5:II, hanger Operation."
	b. Operating Pr CCW Heat Exc provide clea meet the dea	rocedure OP E-5:II, "Auxiliary Sa changer Operation," has been comp ar, adequate guidance regarding a sign requirements.	ltwater System - Two letely revised to ctions necessary to
	2. Corresponding re	ference changes were made to inte	rfacing procedures:
	OP E-5 "Auxil OP E-5:I "Auxil OP F-2 "Compos OP F-2:V "Compos Coold OP AP-11 Abnorm Water PK01-01 Annunc Pressu PK01-06 Annunc	iary Saltwater System" iary Saltwater System - Make Avai nent Cooling Water System" nent Cooling Water System - Opera own" al Procedure - "Malfunction of Co System" iator Response - "ASW System Heat re" iator Response - "CCW Vital Hdr A	lable" tion During Plant mponent Cooling Exchanger Dp/Hdr /B"
	3. A plant Operation interim instruct Shift training s	ns Shift Order was immediately is ions until these procedure change essions were immediately conducte	sued to provide s were implemented. d.
Β.	Corrective-Actions to	o Prevent Recurrence:	
	 PG&E will review procedures to en communications s appropriately in 	the correspondence files and pla sure that engineering corresponde pecific to constraints on plant o corporated into plant procedures.	nt operating nce and perations have been
	2. An expeditious re design engineers FSAR are appropr will be complete FSAR design base	eview of the FSAR will be perform to ensure that the design bases iately implemented in plant proce d by June 30, 1989. A more thoro s will be performed during the de	ed by system and summarized in the dures. This review ugh review of the velopment of the

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NRC Form 344A 19831	LICENSEE VENT REPORT (LER) TEXT CONTINUTION								AMISSION 104
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- 3. A Configuration Management Program was initiated in late 1988 to incorporate detailed system design basis information into existing Design Criteria Memoranda (DCM) and prepare additional DCMs as necessary. After completion of the system DCMs, the plant will perform a detailed review of plant procedures to assure the proper incorporation of appropriate system design bases. An Action Plan will be developed to track this procedure review process. PG&E is confident that the procedural deficiencies discussed in this LER would have been identified and corrected as part of the Configuration Management Program.
- 4. Nuclear Engineering Manual Procedure (NEMP) 3.6 ON, "Operating Nuclear Power Plant Design Changes," will be revised to specify that Engineering-identified constraints on operating practices will be communicated to the plant via the design change process.

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- VI. Additional Information
 - A. Failed Components:

None.

B. Previous LERs:

None.

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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

March 24, 1989

PG&E Letter No. DCL-89-078

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

Re: Docket No. 50-275, OL-DPR-80 Diablo Canyon Unit 1 Licensee Event Report 1-84-040-00 CCW and ASW System Design Basis Requirements Not Incorporated into Plant Procedures Due to Inadequate Tracking of Resolution for Correspondence and Communication

Gentlemen:

Pursuant to 10 CFR 50.73(a)(2)(ii)(B), PG&E is submitting the enclosed Licensee Event Report regarding component cooling water (CCW) system and auxiliary saltwater (ASW) system design basis requirements not being incorporated into plant operating and emergency procedures.

This event has in no way affected the public's health and safety.

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

Sincerely. ່ໝ໌. D. Shiffer

cc: J. B. Martin M. M. Mendonca P. P. Narbut B. Norton H. Rood B. H. Vogler CPUC Diablo Distribution INPO

Enclosure

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