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 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
 AUTH.NAME AUTHOR AFFILIATION
 KIRSCH, D.F. Region 5, Ofc of the Director
 RECIP.NAME RECIPIENT AFFILIATION
 SHIFFER, J.D. Pacific Gas & Electric Co.

SUBJECT: Forwards Insp Repts 50-275/89-24 & 50-323/89-24 on 891127-1208 & notice of violation.

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PDR



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

DEC 28 1989

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

Gentlemen:

SUBJECT: EMERGENCY OPERATING PROCEDURES INSPECTION AT DIABLO CANYON
UNITS 1 AND 2

This letter forwards the results and conclusions of a special team inspection conducted by NRC Region V and the Office of Nuclear Reactor Regulation of activities authorized by NRC Operating License Nos. DPR-80 and DPR-82 for Diablo Canyon Units 1 and 2. This inspection was conducted on November 27, 1989 through December 8, 1989. At the conclusion of the inspection, the findings were discussed with Mr. Townsend and other members of your staff identified in the enclosed inspection report.

The purpose of this inspection was to verify that your Emergency Operating Procedures (EOPs) are technically correct; that their specified actions can be accomplished using existing equipment, controls, and instrumentation; and that the available procedures provide the operator with an effective tool to manage and mitigate potential accidents. The areas examined during the inspection are identified in the attached inspection report. The inspection consisted of a selective examination of procedures, simulated emergencies exercised on your plant specific simulator, procedure walk-throughs in the plant with operations personnel, and interviews with a broad selection of your operations, procedure writing, and training staffs.

Through direct observation of the performance of selected procedures during the simulator exercises, and through plant walk-throughs of selected procedures, we have concluded that your operating staff can effectively use the EOPs to manage and mitigate serious operational events and that the EOPs are technically correct.

However, the inspection did identify numerous minor deficiencies in the EOPs and areas where the verification and validation of the EOPs was not complete. These specific items are described in the enclosed inspection report for your staff to review and correct. These items are based on a relatively small sample of your EOPs. Consequently we expect that your staff will expand upon this list both qualitatively and quantitatively. General areas that need to be specifically addressed include improving the verification and validation program, modifying the writer's guide to make it more definitive, and improving plant lighting.

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Also, during examination of the Operations Training Program related to the EOPs, it was observed that during the requalification cycle your operators only received a few hours of simulator training on the Functional Restoration Procedures and Emergency Contingency Actions. Based on this small amount of training, the results of the simulator exercises, and the EOP walk-throughs we believe it is appropriate for your training staff to review the simulator training program emphasis to ensure appropriate additional weight is given to the Functional Restoration Procedures and Emergency Contingency Actions.

Regarding Quality Assurance activities related to EOPs, it was determined that since early 1989 the Action Requests (AR) initiated by all plant personnel on the EOPs had been given a blanket deferral to allow for one major change to the EOPs. This practice should not set a precedent and ARs need to be handled more promptly in the future. This blanket deferral reduces the effectiveness of the QA program.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The response requested by this letter and its enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,


Dennis F. Kirsch, Chief
Reactor Safety Branch

Enclosures:

1. Inspection Report 50-275/89-24, 50-323/89-24
2. Appendix A to Report 50-275/89-24, 50-275/89-24

cc w/enclosures (1) and (2):

J. Sexton, PG&E
R. F. Locke, PG&E
J. D. Townsend, PG&E (Diablo Canyon)
D. A. Taggart, PG&E (Diablo Canyon)
News Services, PG&E
T. L. Grebel, PG&E (Diablo Canyon)
State of California
Sandra Silver (Report Only)



DEC 28 1989

3

bcc w/enclosures (1) and (2):
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 Project Inspector
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 B. Faulkenberry
 J. Martin
 R. Nease, NRR
 L. Miller
 N. Western

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