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MARTIN,J.B. Region 5, Ofc of the Director

SUBJECT: Submits comments re Insp Repts 50-275/89-35 & 50-323/89-35.

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James D. Shiffer
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January 5, 1990

PG&E Letter No. DCL-90-005

John B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Comments Regarding Inspection Report
Nos. 50-275/89-35 and 50-323/89-35

Dear Mr. Martin:

On December 19, 1989, an Enforcement Conference (Conference) was held in the NRC Region V offices to discuss the facts surrounding the Diablo Canyon containment recirculation sump and Shift Supervisor issues. PG&E has reviewed NRC Inspection Report Nos. 50-275/89-35 and 50-323/89-35 (Inspection Report) dated December 28, 1989, wherein the key points in the Conference were summarized. Based on this review, we believe the Inspection Report properly reflects the discussions held at the Conference.

Since there were a number of issues and a significant amount of information discussed at the Conference, PG&E's key points in its presentation are summarized below. PG&E is reemphasizing these points to clearly reflect PG&E's position and place the issues discussed at the Conference in perspective.

Containment Recirculation Sumps

1. As explained at the December 19 Conference, PG&E acknowledges that the following sump discrepancies should not have occurred: (1) gaps in the outer screen surface; (2) incorrect update of a drawing; (3) debris in the sump; and (4) opening of the access hatch without a more complete safety evaluation. These conditions have subsequently been fully addressed and/or corrected as described in the Conference. Further, they did not significantly affect the ability of the sump to perform its intended safety function.

2. As discussed at length in the December 19 Conference, PG&E believes with a high degree of confidence that the RHR system, even with the identified conditions, would have been capable of performing its intended safety function in the event of a design basis accident requiring containment recirculation. This is based on safety evaluations and supporting studies that considered both the nature of the accident conditions and the

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conservative design of the sump. As stated at the Conference, these evaluations considered the unique and advantageous location of the sump in the annulus area of containment where it is separated from a postulated pipe break by the concrete crane wall, the shielding labyrinths, and the locked wire mesh personnel doors. These evaluations also considered the nature of the debris created by the postulated accident (insulation debris and larger size paint particles) and our conclusion that this debris would sink and not be carried to the sump due to the low velocity of the flow paths.

Additional considerations include the conservative nature of the sump design with its relatively large screen areas, concrete baffle, curb, multiple layers of screen and grating beyond that specified by Regulatory Guide 1.82, and the specific structural design of both the sump and the screen/grating structures. The sump location and design, beginning in 1966 and evolving to the present time, have provided inherent conservatism.

3. Most of the issues associated with the sump design and documentation result from a design change made in 1981, to move the fine mesh screen from the inner sump structure to the outside surface of the sump structure grating. Until that time, the design had been approved by the NRC, and the design, FSAR descriptions, and as-built construction were all entirely consistent. In 1981, PG&E could have continued to accept the design as it was, without change. However, at that time the NRC had several potential design concerns, including vortexing, at other operating plants. This fact, combined with PG&E's concerns regarding potential plugging and subsequent vortexing caused by the location and size of the inner fine mesh screen, prompted PG&E to prepare a design change that relocated the fine mesh screen to the outer surface of the sump structure. This change substantially increased the screen surface area and improved the performance of the sump under postulated accident conditions.

   PG&E believes that the revised design, with the larger screen surface area, is superior to the original approved design with its relatively small inner screen surface area directly over the RHR suction lines, grating only on the top of the outer structure (no fine screen at all), and only coarse screen and grating on the inclined section of the sump outer structure.

   While this design change was not incorporated in the FSAR or correctly shown in the applicable design drawings in 1981, and there was insufficient guidance related to gaps provided in construction specifications, the intent was clearly to be proactive and make a substantial improvement to the existing, approved sump design, and it is our belief that this intent was achieved. If PG&E had not made this design change in 1981, many of the items involved in this Conference would have been avoided, but PG&E would now have a considerably less capable sump design.

4. PG&E believes the actions discussed below are particularly appropriate for finding and correcting discrepancies and inconsistencies at the plant. PG&E's System Engineer Program, with its quarterly walkdowns, has been functioning well and is continually being strengthened. PG&E's enhanced Design Criteria Memorandum (design basis document) program is proving to be both useful and effective in clarifying the design bases and finding discrepancies and inconsistencies. PG&E's SSFAR (vertical slice audits) program is proving effective for finding inconsistencies in both documentation and operational practices and improving system operation. In addition, numerous improvements have been made since 1981 in PG&E's processes for design control, drawing revisions, FSAR updating, and preliminary (Revision "A") walkdowns of proposed plant modifications. Finally, a theme that will be stressed more in the future will be the significance of an individual's signoff that an activity has been correctly accomplished.

   PG&E is confident that aggressive pursuit of these programs and their betterment will enable us to identify conditions such as those associated with the sump, and that these programs will minimize the occurrence of such conditions in the future.

5. Finally, PG&E has committed to perform a study of the containment recirculation sump to optimize its design and operation. This study will consider accident conditions as well as inspection, maintenance, ALARA and operational issues. PG&E will complete this study in 1990 and complete any resulting modifications during the 1R4 and 2R4 plant outages.

Shift Supervisor Issues

1. PG&E believes that its procedures and practices were consistent with the intent of the applicable regulations. Further, the control room staffing was conservative, in that Technical Specification staffing requirements were exceeded. It was the intent of the Shift Supervisor position to meet the post-TMI concern to relieve the Shift Foreman of unnecessary administrative burden.

2. At no time did PG&E place an unlicensed person in charge of activities that required a senior reactor operator (SRO) license. Plant procedures, specifically Nuclear Plant Administrative Procedure (NPAP) A-102, section 4.1, identify the Shift Foreman to "have authority and responsibility to direct all activities affecting the safety of the nuclear power plant." Further, it was understood by the Shift Foremen that the Unit 1 Shift Foreman took the lead when a "tie-breaker" was necessary, which is the intent of the regulatory requirement to have one person in charge. This understanding was further emphasized by NPAP A-102, Rev. 6, which was in effect during the period when an unlicensed Shift Supervisor was present. Paragraph 4.1.4, states:

> In the absence of other supervisors, the Unit 1 Shift Foreman is in charge of all personnel in the plant. The Unit 1 Shift Foreman shall perform the duties of the Shift Supervisor in his absence.

If one argues that an unlicensed Shift Supervisor is, in effect, no Shift Supervisor at all, then clearly, as specified in NPAP A-102, paragraph 4.1.4, the Unit 1 Shift Foreman is in charge of all personnel in the plant.

Further, as acknowledged at the Conference by both PG&E and the NRC, while the particular individual was not SRO licensed at the time of concern, he was previously licensed, maintained his qualifications, and was recognized as being highly qualified and experienced.

3. While PG&E agrees that certain aspects of the Shift Supervisor position were not as well-defined as might have been desirable, PG&E also feels that the staffing configuration was not only adequate to ensure the safety of reactor operation, but was conservative in that staffing resources considerably in excess of those required were always in place, and that the health and safety of the public were not affected. As discussed at the Conference, however, PG&E will take steps to clarify the role of the Shift Supervisor vis-a-vis the Shift Foremen, and require that the Shift Supervisor have an SRO license.

If you require any additional information or wish to have further discussions on these issues, we will be pleased to respond at your convenience. As indicated at the Conference and in LER 1-89-014 (DCL-89-321, December 21, 1989), a supplemental report will be submitted to provide a detailed discussion of the analysis and evaluation regarding the containment recirculation sump and the corrective actions being taken. This report will be submitted by January 19, 1990.

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: A. P. Hodgdon
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