

ENCLOSURE 1

EA91-028

NOTICE OF VIOLATION

Pacific Gas and Electric Company
Diablo Canyon Units 1 and 2

Docket Nos. 50-275/50-323
License Nos. DPR-80/DPR-82

During NRC inspections conducted on November 27-30, 1990, December 17-21, 1990, January 7-11, 1991, and February 11-14, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violation was identified:

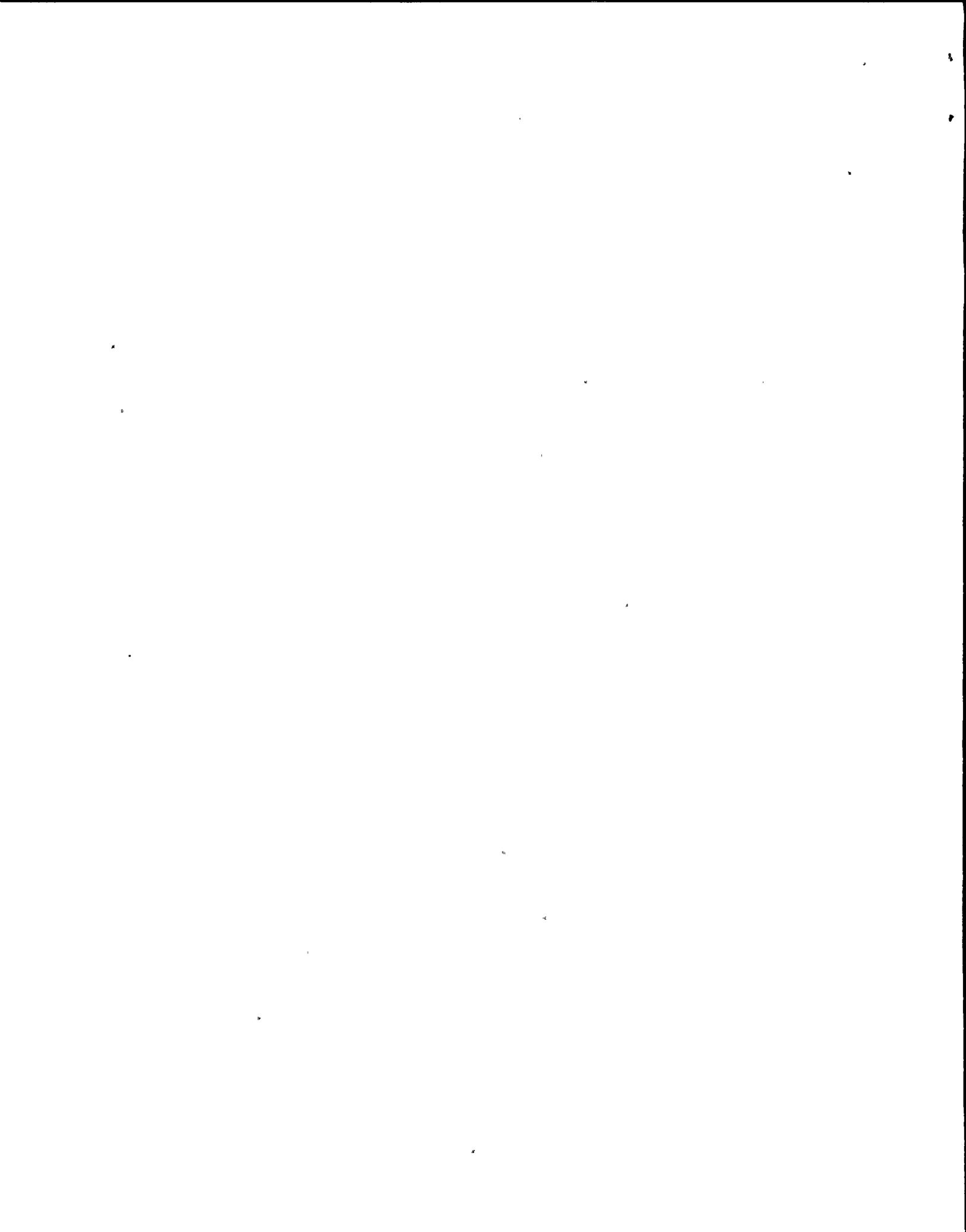
10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," Criterion XVI, "Corrective Action," requires that measures shall be established to assure that conditions adverse to quality, are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Technical Specification 6.8.1.a requires that written procedures be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33; Revision 2, February 1978 (RG 1.33). RG 1.33, paragraph 8.a requires that procedures of a type appropriate to the circumstances should be provided to ensure that tools, gauges... and other measuring and testing devices are properly controlled, calibrated and adjusted at specified periods to maintain accuracy.

Quality Assurance Procedure QAP 15-B, dated October 24, 1990, Nonconformances, Paragraph 2.1, defines a nonconformance, in part, as a quality problem which has occurred at a frequency which indicates that past action to prevent recurrence was ineffective and additional management attention is deemed necessary.

Administrative Procedure NPAP C-12, Revision 20, dated December 31, 1990, (R.19), Identification and Resolution of Problems and Nonconformances, Paragraph 5.4.3.2, states, in part, "If the problem is determined to be a potential nonconformance..., the responsible department head or supervisor shall initiate an NCR..."

Contrary to the above, during the period from November, 1989 through December, 1990, effective corrective actions were not implemented to preclude repetition of significant deficiencies in the control and issue of measuring and test equipment used in activities affecting quality which were identified in licensee Surveillance and Audit reports QCS-89-0175, 90-0030, 90-126 and 90812T.



In addition, a nonconformance report was not initiated to identify this lack of effective corrective action.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 11th day of April 1991.

