

FORD 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9208120153 DOC. DATE: 92/08/05 NOTARIZED: NO DOCKET #
 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
 AUTH. NAME AUTHOR AFFILIATION
 RUEGER, G. M. Pacific Gas & Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-275/92-16 &
 50-323/92-16. Corrective actions: Maint Procedure M-50.23 will
 be revised to enhance steps to be taken in preplanning &
 control of lifting & rigging activities.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

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	DEDRO	1 1	NRR MORISSEAU, D	1 1
	NRR/DLPQ/LHFBPT	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA/OEAB	1 1	NRR/DREP/PEPB9H	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	DE DIR	1 1	OGC/HDS1	1 1
	<u>REG FILE</u> 02	1 1	RGNS FILE 01	1 1
EXTERNAL:	EG&G/BRYCE, J. H.	1 1	NRC PDR	1 1
	NSIC	1 1		

2nd Distribution: Encl 2 was missing in original Distribution

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TOTAL NUMBER OF COPIES REQUIRED: LTR 22 ENCL 22



Pacific Gas and Electric Company

77 Beale Street
San Francisco, CA 94106
415:973-4684

Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

August 5, 1992

PG&E Letter No. DCL-92-179

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

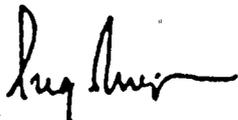
Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Reply to Notice of Violation in NRC Inspection Report 50-275/92-16
and 50-323/92-16

Gentlemen:

NRC Inspection Report (Report) 50-275/92-16 and 50-323/92-16, dated July 7, 1992, contained a Notice of Violation citing one Severity Level IV violation regarding the incorrect use of chainfalls while lifting primary and secondary lids of a radwaste container. PG&E's response to the Notice of Violation is provided in Enclosure 1.

The Report also expressed a concern that the violation indicates a weakness in PG&E's control of lifting and rigging devices for heavy loads, particularly in light of a rigging problem last year involving a loss of offsite power. PG&E's response to this concern is provided in Enclosure 2.

Sincerely,



Gregory M. Rueger

cc: Ann P. Hodgdon
John B. Martin
Philip J. Morrill
Harry Rood
CPUC
Diablo Distribution

DCO-92-MM-N034

Enclosures

1042S/85K/PGD/2237

170085

9208120153

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ENCLOSURE 1

REPLY TO NOTICE OF VIOLATION IN
NRC INSPECTION REPORT 50-275/92-16 AND 50-323/92-16

On July 7, 1992, as part of NRC Inspection Report 50-275/92-16 and 50-323/92-16, NRC Region V issued a Notice of Violation citing one Severity Level IV violation for Diablo Canyon Power Plant (DCPP) Units 1 and 2. The statement of violation and PG&E's response follow.

STATEMENT OF VIOLATION

Diablo Canyon Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, recommends the establishment of procedures for the control of radioactivity, including procedures covering handling of spent resins and filter sludge.

Work Order C0100168, issued for the disassembly and reassembly of a shipping cask containing radioactive resin waste, listed Maintenance Procedure M-50.23, "Loading Pre-loaded Liners Into The NUPAC 10-142 RADWASTE Shipping Cask," for precautions and as a reference for the Work Order. Maintenance Procedure M-50.23 listed Administrative Procedure C-702, "Rigging and Load Handling," as a prerequisite for tagging and inspecting all hoisting equipment.

Paragraph 4.3.1 of Administrative Procedure C-702, Revision 7, states that "Rigging equipment shall not be loaded beyond its Safe Working Load, as certified by the manufacturer or T.E.S., except for load test purposes."

Contrary to the above, on May 28, 1992, licensee personnel incorrectly used two one-ton chainfalls for load leveling while lifting the 10-142 cask primary and secondary lids, with each chainfall loaded to approximately 2400 pounds.

This is a Severity Level IV violation (Supplement 3).

REASON FOR THE VIOLATION

PG&E agrees with the violation.

On May 28, 1992, a NUPAC 10-142 radwaste container was being prepared for shipping. As part of this evolution, the primary and secondary cask lids were being installed. A pre-job tailboard had been conducted since placement of the cask lids is an activity that: (1) is infrequently performed (approximately once every 6 months); (2) involves radioactive materials; and



(3) is a complicated lifting task. The tailboard included communications, crane operations, rigging in accordance with Maintenance Procedure (MP) M-50.23, "Loading Pre-loaded Liners into the NUPAC 10-142 Radwaste Shipping Cask," and ALARA. A Mechanical Maintenance (MM) foreman supervised this rigging activity while the radioactive material was being placed in the cask and until the rigging was attached to the cask lids, at which time he left.

The cask lids were initially lifted by three slings and placed on the cask. The clearance between the cask and the cask primary lid was very tight and required some alignment. In an attempt to align the cask primary lid, the rigging crew decided to change the rigging to two chainfalls and a sling. The rigging crew then mistakenly chose one-ton chainfalls, rather than two-ton chainfalls, which would be required to lift the 7,330 pounds load. The decision by the rigger to use one-ton chainfalls was based on his recollection that the lids weighed less than 6000 pounds, for which one-ton chainfalls would have been adequate; this, in fact, was only approximately the weight of the cask primary lid. The lid was then raised approximately two inches to remove wooden blocks that had been installed to support the lid, then lowered using the chainfalls to level the load.

PG&E's investigation concluded that the cause of this incident was personnel error. The seating of the primary cask lid using chainfalls was: (1) outside of the job scope discussed on the pre-job tailboard; and (2) in violation of AP C-702, "Rigging and Load Handling." PG&E policy dictates that when activities are required which are outside the scope of those discussed in the pre-job tailboard, they should be stopped and another tailboard conducted with the foreman involved. A contributing cause was weakness of rigging instructions in MP M-50.23, which does not provide guidance for manipulating the load in place and subsequently seating the cask lid.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The MM general foreman discussed with the responsible foreman the Plant Manager's previous policy memo regarding tailboard requirements. This policy emphasizes stopping work when difficulties are encountered and reviewing the steps to be taken to adequately complete the job. The MM general foreman conducted a meeting with MM craft personnel stressing the importance of tailboards and stopping work when outside the scope of a tailboard.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The Maintenance Services Manager will discuss industrial safety with the riggers to further emphasize the importance of proper rigging, personnel safety practices, and the stopping of work when required activities are outside the pre-job tailboard scope.

MP M-50.23 will be revised to enhance the steps to be taken in the preplanning and control of lifting and rigging activities to give specific guidance for manipulating loads and seating lids on casks to ensure that the correct equipment is used on the job.

Quality Control will evaluate in-process rigging of heavy loads.



DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is presently in full compliance. MP M-50.23 will be revised by December 31, 1992.



ENCLOSURE 2

REPLY TO NRC CONCERN REGARDING WEAKNESS IN
CONTROL OF LIFTING AND RIGGING DEVICES FOR HEAVY LOADS

NRC Inspection Report 50-275/92-16 and 50-323/92-16, dated July 7, 1992, expressed a concern that the Notice of Violation indicates a weakness in PG&E's control of lifting and rigging devices for heavy loads, particularly in light of a rigging problem last year involving a loss of offsite power (LOOP).

PG&E's understanding of this concern is whether the violation may have any commonality to the March 1991 LOOP event, which was caused by a mobile crane boom that came too close to the 500 KV lines. PG&E's investigation of the 1991 LOOP event determined that it was caused by personnel errors made by the crane operator and foreman, in that they did not follow accident prevention rules and did not recognize electrical safety issues during job planning and execution. As described in DCL-91-079, dated April 8, 1991, corrective actions taken included:

- Training appropriate plant and construction personnel on the electrical safety portions of PG&E's accident prevention rules
- Issuance of a memorandum by the Plant Manager reemphasizing the importance of conducting thorough tailboards

PG&E understands and agrees with the NRC concerns regarding the importance of proper crane operation. However, PG&E believes that the radwaste container rigging violation does not represent a weakness in our program for lifting and rigging of heavy loads program. This belief is based on the following:

- DCPP rigging crews are adequately trained on personnel safety on rigging.
- An extensive pre-job tailboard was conducted for the radwaste container activity, which included a discussion on rigging.
- The foreman was directly involved in the job during the period when he considered that critical activities were being performed.
- The 1991 LOOP event was caused by personnel failing to understand the implications of crane operations on plant safety. The evolution of adjusting the cask lid using chainfalls, while not in compliance with procedures, did not present a threat to personnel safety. If the chainfalls had failed, the lid would have dropped a maximum of two inches and could not have slipped off the lip of the container or affected the stability of the container. In addition, there was no potential for plant equipment to be adversely affected.

In summary, PG&E believes that the LOOP event does not have any commonality with the current rigging incident. However, as discussed in the corrective steps of Enclosure 1, PG&E will use this violation of plant procedures to further reemphasize management's expectations.



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 AUTH.NAME AUTHOR AFFILIATION
 RUEGER,G.M. Pacific Gas & Electric Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

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DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
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	DEDRO	1 1	NRR MORISSEAU, D	1 1
	NRR/DLPQ/LHFBPT	1 1	NRR/DLPQ/LPEB10	1 1
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	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS1	1 1
	<u>REG FILE</u> 02	1 1	RGN5 FILE 01	1 1
EXTERNAL:	EG&G/BRYCE, J.H.	1 1	NRC PDR	1 1
	NSIC	1 1		

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77 Beale Street
San Francisco, CA 94106
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Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

August 5, 1992

PG&E Letter No. DCL-92-179



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ATTN: Document Control Desk
Washington, D.C. 20555

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Sincerely,

A handwritten signature in cursive script, appearing to read 'Greg Rueger'. The signature is written in dark ink on a white background.

Gregory M. Rueger

cc: Ann P. Hodgdon
John B. Martin
Philip J. Morrill
Harry Rood
CPUC
Diablo Distribution

DCO-92-MM-N034

Enclosures

1042S/85K/PGD/2237

9208120153 920805
PDR ADOCK 05000275
Q PDR

Handwritten initials 'JED' in a stylized, slanted font. The letters are dark and appear to be written with a pen or marker. There is a vertical line to the right of the initials.



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