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SUBJECT: Responds to NRC 921030 ltr re violations noted in insp repts 50-275/92-27 & 50-323/92-27.Corrective actions: administrative procedures will be revised to require that examiner & test qualification be included in database.

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

November 25, 1992

PG&E Letter No. DCL-92-262

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 50-275/92-27 and 50-323/92-27

Gentlemen:

NRC Inspection Report 50-275/92-27 and 50-323/92-27, dated October 30, 1992, cited two Severity Level IV violations regarding PG&E's Inservice Inspection and Inservice Testing Program. PG&E's response to the Notice of Violation is enclosed.

Sincerely,

Gregory M. Rueger

cc: Ann P. Hodgdon
John B. Martin
Mary H. Miller
Sheri R. Peterson
CPUC
Diablo Distribution

DCO-92-MM-N058
DCO-92-TN-N055

Enclosure

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ENCLOSURE

REPLY TO NOTICE OF VIOLATION IN NRC INSPECTION REPORT 50-275/92-27 AND 50-323/92-27

On October 30, 1992, as part of NRC Inspection Report 50-275/92-27 and 50-323/92-27, NRC Region V issued a Notice of Violation citing two Severity Level IV violations for Diablo Canyon Power Plant (DCPP) Units 1 and 2. The statements of violation and PG&E's response follow.

STATEMENT OF VIOLATION A

Technical Specification 4.0.5 states in part that "...Inservice inspection of ASME Code Class 1, 2, and 3 components...shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda..."

The ASME Boiler and Pressure Vessel Code, Section XI, 1977 Edition through Summer 1978 Addenda, Subarticle IWA-2300(e) states in part that "Nondestructive examination personnel for all methods shall be examined...Personnel vision examination shall be conducted annually."

Contrary to the above, on October 1, 1992, the NRC inspector identified that vision examinations had not been conducted annually for an examiner who had performed two Unit 1 Section XI Hydrostatic Pressure Tests on September 4, 1992. The examiner had last been tested on January 4, 1991.

This is a Severity Level IV violation (Supplement 1), applicable to Unit 1.

REASON FOR THE VIOLATION

PG&E agrees with the violation.

The examiner was aware of the requirement to annually renew his vision qualification; however, he inadvertently allowed the qualification to lapse. The root cause of the event was determined to be that there were no programmatic requirements for a notification system for impending expiration and periodic qualification review of DCPP examiner qualifications.

It should be noted that the individual in question was one of a small number of DCPP examiners that are not part of the Inservice Inspection (ISI) group. Although the ISI group maintains the qualification files for all individuals certified by DCPP, the ISI group had previously been monitoring the impending expiration of qualifications for ISI personnel only.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The examiner successfully completed his vision test requalification on October 2, 1992.

Because the examiner successfully completed his vision test requalification, the examinations he performed between January 4, 1991, and October 2, 1992, were determined to be acceptable. A review of all current certifications for nondestructive examination (NDE) and visual examiners assured that there are no other discrepancies in examiner vision qualifications.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Although the subject violation was limited to one individual in a small group, it was concluded that the potential existed for this same problem to occur within other groups. As a result, the following Administrative Procedures (APs) will be revised:

- AP B-852, "Qualification and Certification of Plant NDE Examiners"
- AP B-853, "Qualification and Certification of ISI Visual Examiners"
- AP B-854, "Qualification and Certification of Visual Welding Inspectors"

The revisions will require that examiner and vision test qualifications be included in a computer database listing each individual's special qualifications. Each individual and his or her supervisor shall assure, on a monthly basis as required for all potential job assignments, that these qualifications are maintained current.

The NRC Inspection Report transmitting this NOV noted that the violation was similar to a previous NOV issued in NRC Inspection Report 50-323/83-04, dated March 10, 1983, which cited two contractor individuals whose annual visual examinations had expired during the unplanned extension of a job beyond its original schedule. The contractor in the earlier NOV certified its own employees and maintained their qualification records. P&GE reviewed the corrective actions associated with the earlier NOV as part of its root cause analysis and development of corrective actions in response to the current NOV. The procedure revisions described above will ensure that PG&E and contractor qualifications are maintained current.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Based on the satisfactory review of current examiner vision qualifications, PG&E is presently in full compliance. The revisions to AP B-852, B-853, and B-854 will be completed by February 15, 1993.

STATEMENT OF VIOLATION B

10 CFR Part 50, Appendix B, Criterion XVI states in part that "Measures shall be established to assure that conditions adverse to quality, such as... deviations, and nonconformances are promptly identified..."

Administrative Procedure NPAP C-12/NPG-7.1, "Identification and Resolution of Problems and Nonconformances," Revision 21, Section 4.1 states in part that "Any individual who discovers a problem... or a nonconformance or suspects that a problem or nonconformance exists, is responsible for initiating an Action Request (AR)..."

Subsubarticle IWP-4510 of Division 1 of Section XI of the ASME Code states in part that "At least one Displacement Vibration Amplitude (Peak-to-Peak Composite) shall be read during each inservice test... on a pump coupled to the driver, the measurement shall be taken on the bearing housing near the coupling."

Contrary to the above on October 1, 1992, an NRC inspector identified that an AR had not been initiated to identify the problem that Section 10.23 of test procedure STP P-6B, "Routine Surveillance Test of Steam-Driven Auxiliary Feedwater Pump," Revision 23, incorrectly identified the location to take vibration measurements for Test Point 3. Revision 23 incorrectly identified the location of Test Point 3 as on the pump casing, instead of on the bearing housing near the coupling as required by the ASME Code. The licensee issued Revision 24 to procedure STP P-6B on September 25, 1992, to correct the error. However, the problem was not documented on an AR, nor were earlier surveillance tests of the Unit 2 safety-related auxiliary feedwater pump 2-1 (performed on June 10, 17, July 8, August 5, and September 3, 1992, in accordance with the incorrect instructions) evaluated for potential impact on the operability of safety-related pump 2-1.

This is a Severity Level IV violation (Supplement 1), applicable to Unit 2.

REASON FOR THE VIOLATION

PG&E agrees with the violation.

Although the diagram in STP P-6B is only intended to show the general locations and relative positions of the data points, PG&E agrees that the discrepancy in the procedure diagram raises some uncertainty regarding whether the data were taken at the proper location. PG&E relies on the operators' training and skill-of-the-craft in taking these measurements.

Personnel statements from the operators that collected the vibration data based on Revision 23 of STP P-6B do not conclusively indicate whether all the measurements were taken at the proper location. However, it should be noted that several performances of this monthly test, including a February 1992

rebaseline test, were observed by the system engineer and the Inservice Testing Coordinator and judged to have been performed properly, even during the time the diagram discrepancy was present in Revision 23 of the procedure. Sample test data were taken at the incorrect location indicated in Revision 23, and the readings were found to be within the normal data scatter for data taken at the proper location. Therefore, it cannot be conclusively determined whether the previous data were taken at the proper location.

Administrative Procedure AD1.ID2, "Review Level "A" Procedure Review, Approval, Revision Control, and Training Notification," provides specific guidance for procedure revisions. Procedure AD1.ID2 states that an Action Request (AR) is only needed when the procedure does not work, poses a risk to personnel or equipment, or violates quality assurance requirements. The discrepancy in the STP P-6B diagram was not considered to meet these criteria, since the diagram discrepancy did not appear to cause confusion and was considered to be "typographical" in nature. PG&E agrees that the evaluation of this discrepancy should have been more thoroughly documented.

Although the system engineer's assessment of the impact of the discrepancy had not been formally documented in an engineering evaluation, his review of the vibration data indicated that it was consistently below alert levels and comparable to baseline data. If vibration levels had reached levels that required action to be taken, the vibration would also have been noted at the incorrect location specified in the diagram. The diagram discrepancy was discovered during the process of drafting Revision 24 and was immediately corrected to minimize the potential for misunderstanding in the future.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Revision 24 of STP P-6B, issued on September 25, 1992, corrected the discrepancy in the diagram.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

PG&E will revise the following Administrative Procedures:

- AD1.ID2, "Review Level "A" Procedure Review, Approval, Revision Control, and Training Notification"
- AD1.ID3, "Review Level "B" Procedure Review, Approval, Revision Control, and Training Notification"

The revisions will include additional guidance to clarify when an AR is required for a change to a procedure.

In the interim until the above procedure revisions are completed, a memorandum from the Plant Manager will be issued to provide guidance regarding when an AR is required for procedure changes.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Revision 24 of STP P-6B corrected the discrepancy in the diagram and PG&E is presently in full compliance. The revisions to AD1.ID2 and AD1.ID3 will be completed by February 28, 1993.