

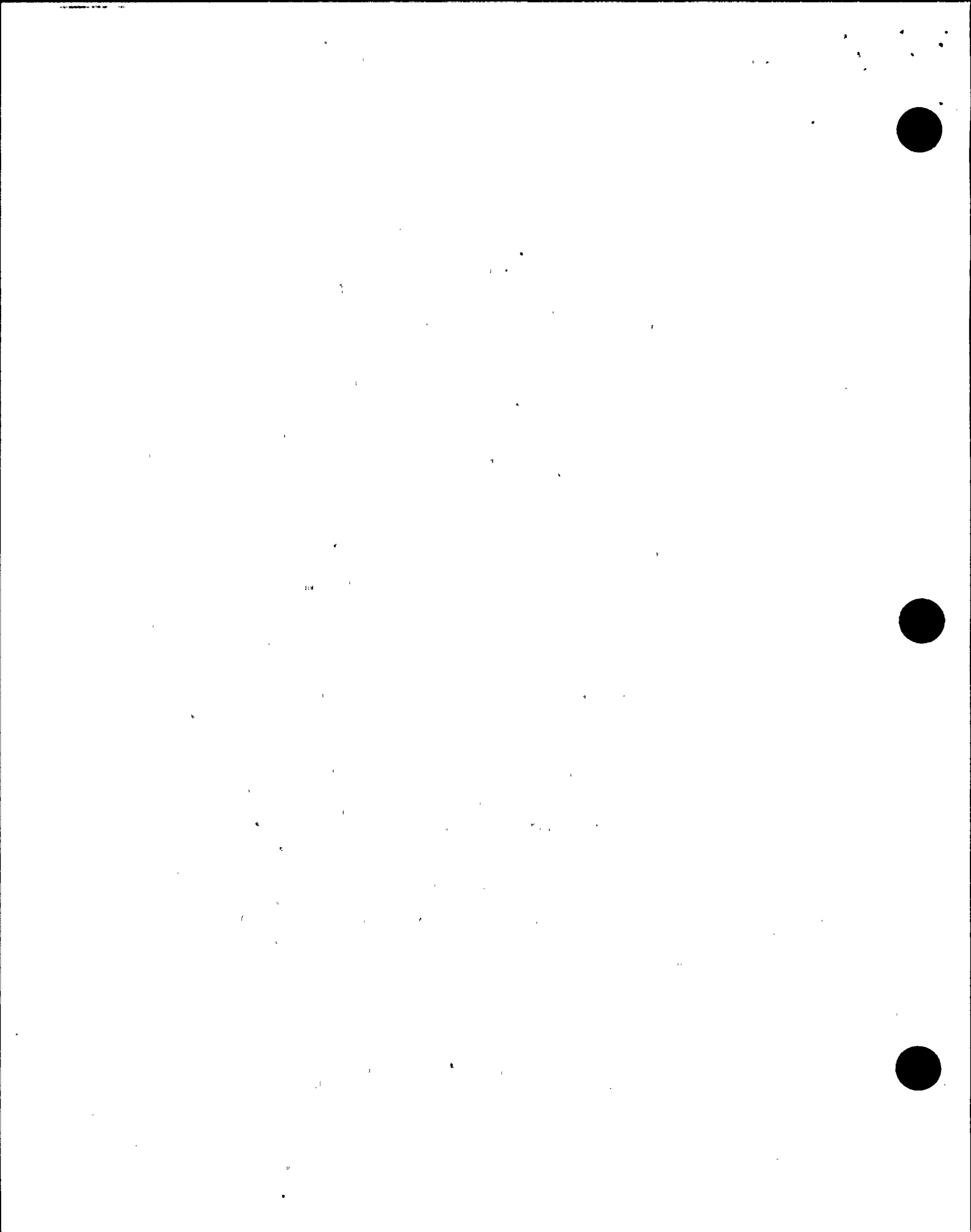
NOTICE OF VIOLATION

Pacific Gas & Electric Company
Diablo Canyon Power Plant, Units 1 and 2

Dockets 50-275, 50-323
Licenses DPR-80 and DPR-82

During an NRC inspection conducted February 14-17, 22-25, and March 1, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. Technical Specification 6.8.1 states in part that written procedures shall be established, implemented, and maintained covering activities referenced below:
- a. Applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 1(d) of Appendix A recommends administrative controls for procedure adherence.
 - f. Offsite Dose Calculation Procedures and Environmental Radiological Monitoring Program.
 - g. Quality Assurance Program for Effluent and Environmental Monitoring.
1. Licensee procedure AD2, "Procedure Use and Adherence," Section 5.1.2, which implements Technical Specification 6.8.1(a), stated in part that personnel shall use approved procedures to the fullest capability, which includes:
- f. Performing the task in accordance with the procedure.
 - g. Recording data as directed by the procedure.
 - h. Ensuring that all of the expected indications are observed and that no unexpected indications exist.
 - i. Remaining aware of potential deficiencies or improvements in the directions provided by procedures.
 - j. Stopping work when an incorrect or imprecise procedure step is encountered and having it corrected in accordance with approved methods.
- Contrary to the above:
- a. During the January 1993 and January 1994 beta efficiency calibrations, the licensee performed alpha efficiency calibrations, which were not in accordance with any established licensee procedure.



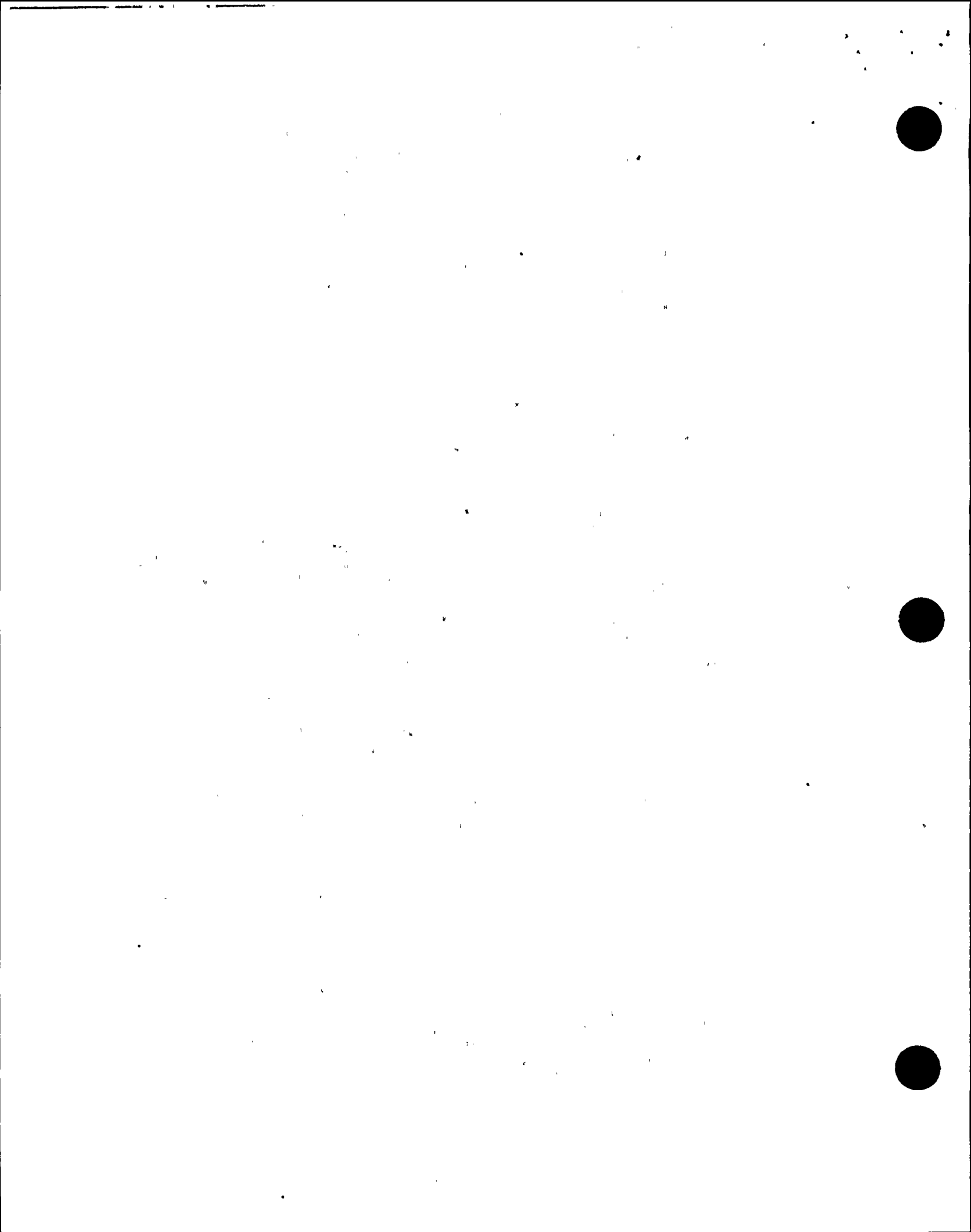
- b. During the January 1993 and January 1994 efficiency calibrations, calculations used in procedure E-1 were incorrect, imprecise, and when encountered by the licensee, were not corrected in accordance with approved methods.
 - c. During the February 1993 and February 1994 strontium and yttrium calibrations, technicians used steps to make the yttrium-90 results precise and correct without stopping work and without making corrections to procedure E-10 in accordance with approved methods.
2. NPAP C-204/NOS-4.3.9, "Nuclear Plant Administrative Procedure [NPAP] Radiochemical Intracompany Cross-Check Program," Section 4.7.3, stated that the Supervising Engineer, RECE, shall prepare a report which evaluates the results obtained by each laboratory within four weeks of receiving the data from the participating laboratory.

Contrary to the above, the licensee did not prepare written reports which evaluated the results of the TES Health Physics unit's intracompany laboratory spiked samples submitted to the Supervising Engineer, RECE, from March - November 1993 until March 14, 1994, a period exceeding four weeks.

3. Procedure C-4, "Operation of the (Tennelec 5100) Low Background Proportional Counting System," Section 3.7, "Alpha and Beta Plateaus," required the technicians in part:
- * To use polonium-210 to perform the alpha plateau.
 - * To use a beta source of approximately 50,000 counts per minute or greater (e.g., Strontium-90) in carrier No.1.
 - * To set the operating high voltage at that point above the knee and where the slope per 100 volts is less than 2.5 percent.

Contrary to the above:

- a. In January 1994 americium-241 rather than polonium-210 was used by the technician to perform the alpha plateau.
- b. In January 1993 the beta source in carrier No.1 only reached a maximum of 13,600 counts.
- c. In January 1993 and January 1994, TES Health Physics technicians set the beta plateau high operating voltages by estimating a point one-half to two-thirds above the knee, and not by determining where the slope per 100 volts was less than 2.5 percent.



4. Procedure E-1, "Calibration of Tenelec LB5100 for Gross Beta Activity," required in part:

- * Calculate the efficiency using [Hewlett-Packard] HP-9845 for calculation as described in [Environmental Procedure] EP F-9 [Efficiencies for Beta Activity and K-40 Activity].
- * Plot a graph of efficiency versus mass of sample.

Contrary to the above:

- a. During the January 1993 and January 1994 efficiency calibrations, the licensee did not use the HP-9845 for calculations described in EP F-7
- b. During the January 1993 and January 1994 efficiency calibrations the licensee did not plot graphs of efficiency versus mass of samples.

This is a Severity Level IV violation. (Supplement I) (50-275/94-04-02 and 50-323/94-04-02)

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas & 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 IV, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (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, the Commission may issue an order or a demand for information as to 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 15 day of April 1994

