



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

MAY 23 1994

Dockets: 50-275
50-323
Licenses: DPR-80
DPR-82

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ATTN: Gregory M. Rueger, Senior Vice
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SUBJECT: NRC INSPECTION REPORT 50-275/94-04 AND 50-323/94-04

Thank you for your letter of May 2, 1994, in response to our letter and Notice of Violation dated April 1, 1994. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

for Samuel J. Collins, Director
Division of Radiation Safety
and Safeguard

cc:
Sierra Club California
ATTN: Dr. Richard Ferguson
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Pacific Gas and Electric Company

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Diablo Canyon Nuclear Power Plant
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-4-

bcc to DMB (IE06)

bcc w/copy of licensee's letter dated May 2, 1994:

L. J. Callan

Diablo Canyon Resident Inspector

DRSS/FIPB

MIS System

RIV File

Branch Chief (DRP/E, WCFO)

Senior Project Inspector (DRP/E, WCFO)

Leah Tremper, OC/LFDCB, MS: MNBB 4503

J. M. Reese (WCFO - DRSS/FIPB)

RIV:C:FIPB <i>RP</i>	DD:DRSS <i>RP</i>	D:DRSS <i>RP</i>		
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Pacific Gas and Electric Company

-4-

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RIV:C:FIPB <i>DR</i>	DD:DRSS <i>DR</i>	D:DRSS <i>DR</i>		
JMReese:nh		<i>DR</i> SJCollins <i>DR</i>		
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Gregory M. Rueger
Senior Vice President and
General Manager
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May 2, 1994



PG&E Letter DCL-94-093

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

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 and Response to Concerns
in NRC Inspection Report Nos. 50-275/94-04 and 50-323/94-04

Gentlemen:

NRC Inspection Report 50-275/94-04 and 50-323/94-04, dated April 1, 1994, contained a Notice of Violation (NOV) citing one Severity Level IV violation involving examples of failure to maintain and adhere to established procedures, as required by Technical Specification 6.8.1, for implementation of the Radiological Environmental Monitoring Program (REMP). PG&E's response to the NOV is provided in Enclosure 1.

PG&E has reviewed and evaluated the Inspection Report findings. PG&E's objective is to have a high quality REMP. PG&E believes that the technical quality and results of the work being performed by its Technical and Ecological Services (TES) organization are excellent. However, PG&E understands that to maintain a high quality program, procedures must be accurate and current and individuals using them must understand the importance of following those procedures. PG&E believes that the corrective actions being taken, as discussed in Enclosure 1, are responsive to the NOV and should resolve the NRC's concerns.

The Inspection Report also identified NRC concerns regarding implementation of the REMP and the effect of the PG&E 1993 reorganization on the REMP. PG&E's review of these concerns indicates that the 1993 PG&E reorganization has not adversely affected the quality of TES' implementation of the REMP. However, PG&E agrees with the NRC that the interface between TES and the

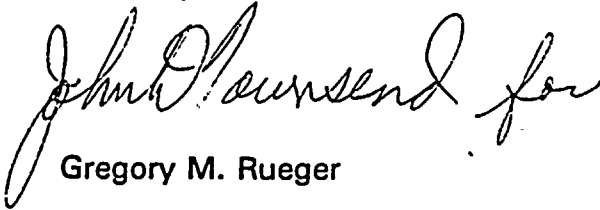
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May 2, 1994

Nuclear Power Generation Nuclear Quality Services (NQS) organization can be clarified, and that NQS audits of TES can be improved. Details on PG&E's review and response to these NRC concerns are provided in Enclosure 2.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Plausend for".

Gregory M. Rueger

cc: Leonard J. Callan
Mary H. Miller
Kenneth E. Perkins
Sheri R. Peterson
Diablo Distribution

Enclosure

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ENCLOSURE 1

**REPLY TO NOTICE OF VIOLATION IN
NRC INSPECTION REPORT NOS. 50-275/94-04 AND 50-323/94-04**

On April 1, 1994, as part of NRC Inspection Report Nos. 50-275/94-04 and 50-323/94-04 (Inspection Report), NRC Region V issued a Notice of Violation citing one Severity Level IV violation for Diablo Canyon Power Plant, Units 1 and 2. The statement of violation and PG&E's response follow.

STATEMENT OF VIOLATION

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 intercompany 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 Tennelec 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)"

REASON FOR THE VIOLATION

PG&E agrees with the violation as stated in the Inspection Report, in that there were instances of Technical and Ecological Services (TES) and Nuclear Power Generation (NPG) personnel not performing Radiological Environmental Monitoring Program (REMP) work in accordance with approved procedures. PG&E reviewed the NRC's concerns. PG&E agrees that the quality of the REMP procedures can be enhanced. Revisions to these procedures are being made as discussed below. In addition, PG&E concluded its management expectations for procedural compliance were not being met. Actions to improve REMP procedural compliance are also discussed below.



During our review, PG&E identified several instances where clarification of NRC observations could provide a more complete understanding of the events in question. While these clarifications do not change our response to the violation, PG&E considers the clarification important to the NRC's perception of the problem.

The cause of the four specific instances of failure to follow procedures identified in the violation are as follows:

1. Calibration activities

The January 1993 and 1994 alpha efficiency calibrations were being performed by the TES Radiological Laboratory in support of PG&E's non-nuclear facilities. The data required to perform alpha efficiency calibrations are automatically obtained whenever beta efficiency calibrations are performed in accordance with Procedure E-1, "Calibration of Tennelec LB5100 for Gross Beta Activity." Alpha efficiencies in air filters are not required for Diablo Canyon Power Plant (DCPP) or Humboldt Bay Power Plant (HBPP). Nonetheless, PG&E agrees that Procedure E-1 could be enhanced to specify the alpha efficiency calibration methodology that was being used.

A concern was noted that the January 1993 and 1994 efficiency calculations used in Procedure E-1 were imprecise. The equation given in Procedure E-1 used the term "counts per minute" as a factor in the equation. PG&E agrees that Procedure E-1 could be enhanced to specify "counts per minute" as "net counts per minute." The TES technicians correctly used "net counts per minute" in their calculations.

When performing the February 1993 and 1994 strontium and yttrium calibrations, technicians used the general guidance of Procedure E-10 and "skill of the crafts" to record the date and time of the yttrium separation. Although this step is implied, PG&E agrees that Procedure E-10 could be enhanced to specify recording date and time of the yttrium separation.

2. Radiochemical Intracompany Cross-Check Program Report

PG&E agrees that Procedure C-204 was not met when reports evaluating the cross-check comparison were not prepared. The cause of the reports not being prepared was personnel error by the individual who was assigned the responsibility of preparing the report.

3. Operation of the Tennelec LB5100

PG&E reviewed Procedure C-4 and the vendor manual and held discussions with the vendor regarding the use of Americium-241 as an alpha source. Procedure C-4 specifies the use of an alpha source and gives Polonium-210 as an example of an alpha source. Neither Procedure C-4 nor the vendor manual specifies the exclusive use of Polonium-210 as an alpha source. The vendor



indicated that the use of Americium-241 as an alpha source was also acceptable.

PG&E reviewed the beta plateaus performed in 1992, 1993, and 1994. Our review concluded that in 1992 and 1994 the counts exceeded 50,000 after the knees of the beta plateaus. However, PG&E agrees that the 1993 beta plateau only reached a maximum of 13,600 counts, which is contrary to the requirements of Procedure C-4 and the recommendation of the vendor manual. PG&E agrees that the procedure was not followed. In April 1994, the vendor was contacted and concurred that the use of a 13,000 count source was acceptable, provided that the required number of counts after the knee of the plateau is at least 10,000.

Procedure C-4 defines the operating high voltage as that point on the beta plateau which is 50 to 75 volts above the knee and where the slope per 100 volts is less than 2.5 percent. The technician performed this activity, which was subsequently reviewed by either a radiochemist or a health physicist to ensure the operating voltage satisfied the criteria in Procedure C-4. This verification confirmed the validity of the operating voltage. The technical adequacy of Procedure C-4 to perform the beta plateau has been reviewed and found satisfactory by an independent review performed by an NPG senior health physics engineer.

4. Efficiency Determination

Procedure E-1 required that the HP 9845 be used for gross beta efficiency calibrations. During the January 1993 and 1994 efficiency calibrations, hand calculations were performed instead of using the HP 9845. PG&E agrees that Procedure E-1 should have been revised prior to implementing this change in practice.

Procedure E-1 required plotting the efficiency versus mass of sample graphs when calibrating the Tennelec LB5100 for gross beta analysis of biological samples. During the January 1993 and 1994 efficiency calibrations, a graph of efficiency versus mass of the sample was not performed. Currently, gross beta analyses are not performed on biological samples from either nuclear facility. Gross beta analyses of air samples are performed for DCP, but a plot of efficiency versus mass is not required by Procedure E-1 because the sampling process produces a uniform mass and, as a result, does not require a sample mass correction. Nevertheless, PG&E agrees that nuclear facility-related procedures must be followed.



CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. Calibration Activities

- a. Procedure E-1 has been enhanced to specify the alpha efficiency methodology to be used. Procedure E-1 also was enhanced to clarify that net counts per minute should be used for efficiency calculations.
- b. Procedure E-10 has been enhanced to provide more specificity regarding the yttrium precipitation methodology.

2. The report of the results of the intercompany cross-check program was issued March 15, 1994. The program was administered in 1993 under Nuclear Plant Administrative Procedure (NPAP) C-204/NOS-4.3.9 and Humboldt Bay Administrative Procedure (HBAP) C-204. The NPAP was consolidated into Interdepartmental Administrative Procedure (IDAP) CY1.ID1, which was approved on April 15, 1994. HBPP will revise HBAP C-204 to reflect the requirements of the new IDAP by June 30, 1994. IDAP CY1.ID1 identifies DCPD Site Quality Control as the new group responsible for evaluating the analytical results and preparing subsequent reports. TES will issue an Action Request (AR) in the Plant Information Management System (PIMS), which will allow DCPD Site QC to track the cross-check program samples.

3. The vendor was contacted in April 1994. The vendor confirmed the acceptability of performing a beta plateau with any source intensity provided at least 10,000 counts are obtained after the knee of the beta plateau.

4. Procedure E-1 has been revised to allow performance of hand calculations for efficiency calibrations. Procedure E-1 has also been revised to delete calibration of the Tenelec LB5100 for gross beta activity in biological samples. Gross beta activity for biological samples is not used for nuclear-related activities.

In addition to the above, the following programmatic actions were taken:

TES has revised its quality program (Procedure 14.0, "Problems and Nonconformances," effective April 25, 1994) to conform the AR initiation system, as it is implemented at TES, to the system implemented at DCPD. This authorizes personnel at TES who have identified a problem to either initiate an AR in PIMS or to initiate a TES AR initiation document (i.e., form) and submit it to their supervisor, who shall then assure that employee concerns with procedures or any other aspect of TES nuclear work are documented and resolved in a timely manner.

TES has adopted the NPG Editorial Change procedure revision process (Procedure 5.1, "Procedure Review and Approval," effective April 25, 1994). This will enhance the ability of TES personnel in making procedure revisions and help assure that TES procedures are current and up-to-date.



On March 29, 1994, TES conducted a Supervisors' Communication meeting. During this meeting, the new methods for editorial change for procedures and use of the AR system were discussed. During this meeting, the importance of following approved procedures and timely identification and resolution of problems was stressed.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Procedure C-4 will be revised by August 20, 1994, to allow additional flexibility. The required number of counts after the knee of the plateau will be at least 10,000. The user will use the source designated by the health physicist to be appropriate for plateau determination.

TES has initiated a Nonconformance Report (NCR) to address the REMP concerns identified by the NRC, to identify and resolve any additional problems that may be associated with the REMP, and to identify corrective actions that are required to prevent recurrence. All procedures controlling the NPG REMP are currently being reviewed. These procedures will be revised by October 1, 1994, as necessary, to assure that responsibilities and program requirements are clearly delineated.

TES will develop and implement a training program to assure that all TES personnel performing nuclear quality-related work understand (1) the importance of performing their work in accordance with approved procedures, and (2) the importance of timely identification and resolution of quality problems. Training will be implemented and completed by July 1, 1994.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance.

Procedure C-4 will be revised by August 20, 1994.

HBPP Procedure HBAP C-204 will be revised by June 30, 1994.

Reviews and revisions of all procedures controlling the REMP will be completed by October 1, 1994.

TES nuclear quality awareness training programs will be completed by July 1, 1994.



ENCLOSURE 2

**RESPONSE TO NRC CONCERNS IDENTIFIED IN NRC
INSPECTION REPORT NOS. 50-275/94-04 AND 50-323/94-04**

NRC Inspection Report 50-275/94-04 and 50-323/94-04 identified concerns regarding implementation of the REMP and the effect of the 1993 PG&E reorganization on the REMP. PG&E has reviewed and evaluated each of the NRC's concerns and has taken steps to address them. PG&E believes the actions described below are responsive to the NRC's concerns.

NRC Concern:

The licensee's audits met the requirements of the Technical Specification (TS), but enhanced training or qualification of Quality Assurance (QA) auditors could improve the technical quality of REMP audits.

PG&E Response:

NPG QA (NQS) audit team composition will be evaluated and enhanced. This will ensure that an audit team member has training or experience as recommended in NRC Regulatory Guide 4.15. Other enhancements will include the development and implementation of audit basis guidelines, better auditor qualification documentation, and trending of TES quality problems.

NRC Concern:

The TES Nuclear Quality Management (NQM) and NPG QA interface could be improved based on the weakness identified in the TES/NPG interface procedure and the lack of meaningful QA/QC oversight of the REMP.

PG&E Response:

NPG QA (NQS) is strengthening quality assurance oversight at the TES facility by increasing the use of performance-based audit techniques in future audits.

The roles and relationships between NPG Nuclear Quality Services (NQS) and TES NQM will be clarified in Procedure OM1.ID5, "Interface Procedure Between Technical and Ecological Services and Nuclear Power Generation Departments." Specifically, programmatic and technical audits and surveillances will be performed by NPG NQS. TES program development, procedure reviews, quality problem administration,



monitoring, and appropriate inspections will be performed by TES NQM. Procedure OM1:ID5 is scheduled to be revised by September 1, 1994.

NRC Concern:

The NRC identified several failures to follow approved procedures and a perceived willingness to use unapproved procedural steps instead of identifying the problem and correcting the procedure.

PG&E Response:

TES NQM will develop and implement a training program for all TES personnel involved in nuclear quality related work to assure that they are aware of the importance of following approved procedures, and the timely identification and resolution of quality problems. TES has already conducted a Supervisors' Communication meeting that addressed those concerns.

NRC Concern:

The licensee's 1992 Annual Radiological Environmental Operating Report and REMP did not recognize the increased Cobalt-58 as a concern.

PG&E Response:

Procedure A-7, "Environmental Radiological Monitoring Procedure - DCP (Normal Operation)," which controls the REMP, does not require algae sampling at any of the marine stations. Since there is no NRC reporting requirement for isotopes detected in this medium, PG&E has historically used the reporting levels for fish as the administrative level for the isotopes of interest in algae.

In 1992, Co-58 was detected in 6 samples out of 68 algae samples. Although the level of Co-58 detected in these 6 samples did not approach the reporting level for Co-58 in fish, the TES health physics supervisor contacted DCP to discuss their significance. Spikes were noted in the bull kelp blade and pneumatocyst in September 1992 and in the iridaea in October 1992. Subsequent samples in 1992 and 1993 had either nondetectable or significantly lower levels. The Co-58 level in plant effluent was not unusual. These higher levels for Co-58 in algae could be attributed to sampling variation.

To enhance the program, PG&E has revised Procedure A-11, "Review of Radioanalytical Data," to include administrative limits for isotopes of interest to the REMP and to require initiation of an AR if the administrative limit is exceeded. PG&E has also implemented the use of control charts to detect trends. These control charts were incorporated into the 1993 Annual Radiological Environmental Operating Report.



NRC Concern:

The licensee's reorganization and consolidation resulted in the loss of the REMP's senior radiochemist. The inspector concluded that the organization and staff changes have removed a level of quality control needed to assure a technically effective REMP.

PG&E Response:

Prior to the 1993 reorganization, technical oversight and validation of the work performed by the senior technician was shared by the radiochemist and the senior health physicist. The radiochemist was also responsible for preparing the samples for the Company's intralaboratory analyses program. The senior health physicist provided technical oversight for this latter work.

In June 1993, the radiochemist left PG&E. As the REMP was well established and routine in nature, the need for a full-time radiochemist in the Health Physics Unit was reevaluated to determine if the same quality could be maintained in a more efficient manner. TES concluded that the work of the radiochemist could be distributed to the senior health physicist and to another radiochemist in another unit of the TES Chemical and Environmental Engineering Section.

As a result of the redistribution of the work, the senior health physicist remained responsible for providing technical oversight and assumed the responsibility for validation of all the REMP calibrations and analyses. As a program enhancement, a radiochemist in the Chemical Engineering Unit was assigned responsibility for preparing the intralaboratory analyses samples. The Chemical Engineering Unit Supervisor, who has a degree in nuclear chemistry, was assigned responsibility for the technical oversight of the radiochemist's work. This enhancement provides an independent review of the Health Physics Unit's participation in the Company's intralaboratory analysis program.

In summary, the level of quality review was unchanged by the reorganization in the Health Physics Unit. TES will continue to monitor the impact of the consolidation of positions by evaluating the results of the inter- and intra-laboratory comparison programs, audit findings, and use of overtime. The DCPQ quality organization, through its programmatic-based audits, will verify that an adequate level of quality exists.

NRC Concern:

During the inspection it was noted that a new TES/NPG interface procedure (OM1.ID5, effective March 24, 1994) identified additional 10 CFR 50, Appendix B QA-related activities for TES over the existing interface procedure



(NPAP A-11/NPG-3.1). These activities were identified as calibrations, evaluations, inspections, examinations, special testing, and analyses. The NRC was concerned that the change in this procedure indicated an increased role for TES in NPG's business as a result of the March 1993 reorganization.

PG&E Response

The inclusion of these additional activities in the scope of OM1.ID5 does not represent an increased role of TES in NPG business. This is because prior to March 24, 1994, TES/NPG interface was governed by two administrative procedures. When the two interface procedures were converted to the new NPG procedure format, it was decided to combine them and only have one interface procedure. As a result, the scope of the new procedure was expanded to include the activities identified as both routine and nonroutine. This consolidation of the two procedures did not result in an increase in the scope of work performed by TES on behalf of NPG.

The following two administrative procedures were in effect prior to March 24, 1994:

- NPAP A-11/NPG-3.1, "NPG/TES Administrative Interface Procedure for Routine Work Areas"

This procedure covered such TES activities as acoustical testing, health physics, instrument calibration and repair services, and chemical analysis.

- NPAP A-12/NPG-3.2, "TES Administrative Interface Procedure for Nonrecurring Tasks."

This procedure covered nonregular tasks, such as evaluations, assistance, inspections, examinations, special tests, and/or analyses.

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