

PACIFIC GAS AND ELECTRIC COMPANY

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July 6, 1979

Mr. R. H. Engelken, Director
Office of Inspection and Enforcement
Region V
U. S. Nuclear Regulatory Commission
1990 N. California Boulevard
Walnut Creek Plaza, Suite 202
Walnut Creek, CA 94596



Docket No. 50-275-OL
Docket No. 50-323-OL
Diablo Canyon Site

Dear Mr. Engleken:

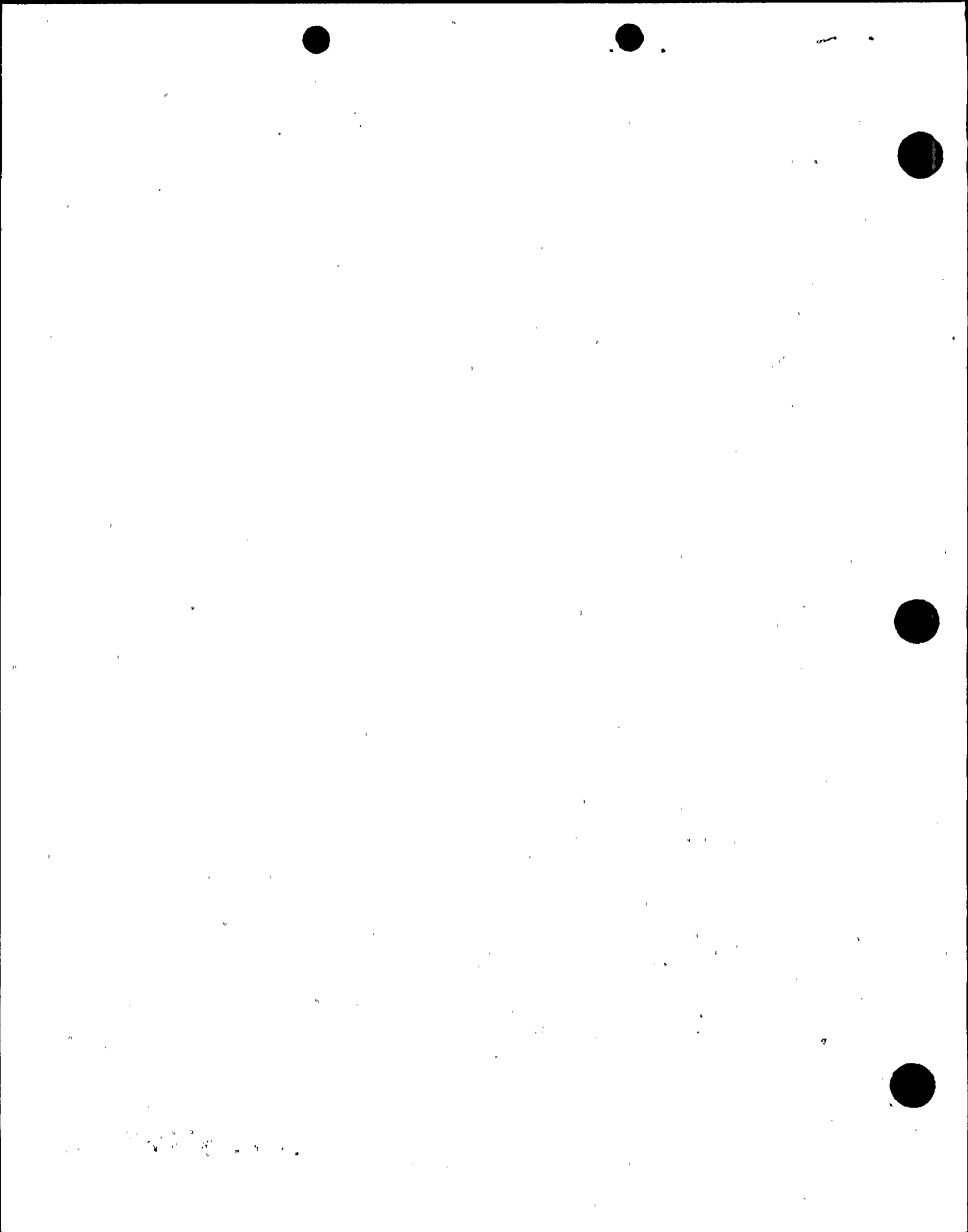
This report is being submitted in accordance with Part 2, Title 10, Section 2.201, Code of Federal Regulations in response to the formal Notice of Violation received on June 4, 1979 which cited:

- Item A An instrument tubing hanger attached to Unit 2 large bore pipe support No. 49-12V, was not "As built" and approved as required by Drawing 049237, Paragraph 10, Revision 4.
- Item B1 Nonvital conduits KHT-52 and 53 were both attached to support K-115-6-47 (a vital bus F support) and an unnumbered vital bus H support of detail number 397 without having an intermediate Class 1 support provided, as required by PG&E Drawing 050029, Note 60.
- Item B2 Nonvital conduits K-9424, K-9430, and K-9652 were installed above and crossing vital conduit without having a Class 1 support provided on each side of the intersection, as required by PG&E Drawing 050030, Note 3.

As a result of Mr. Kirsch's findings:

- Item A Minor Variation Report E-2151 was issued April 30, 1979. Subsequent investigation resulted in issuance of NCR-DCO-79-RE-006, May 11, 1979 superseding the Minor Variation Report.
- Item B1 B2 Minor Variation Report E-2152 was issued May 3, 1979. Should investigation of this problem identify a serious deficiency, a Nonconformance Report will be issued.

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The following corrective actions have been performed:

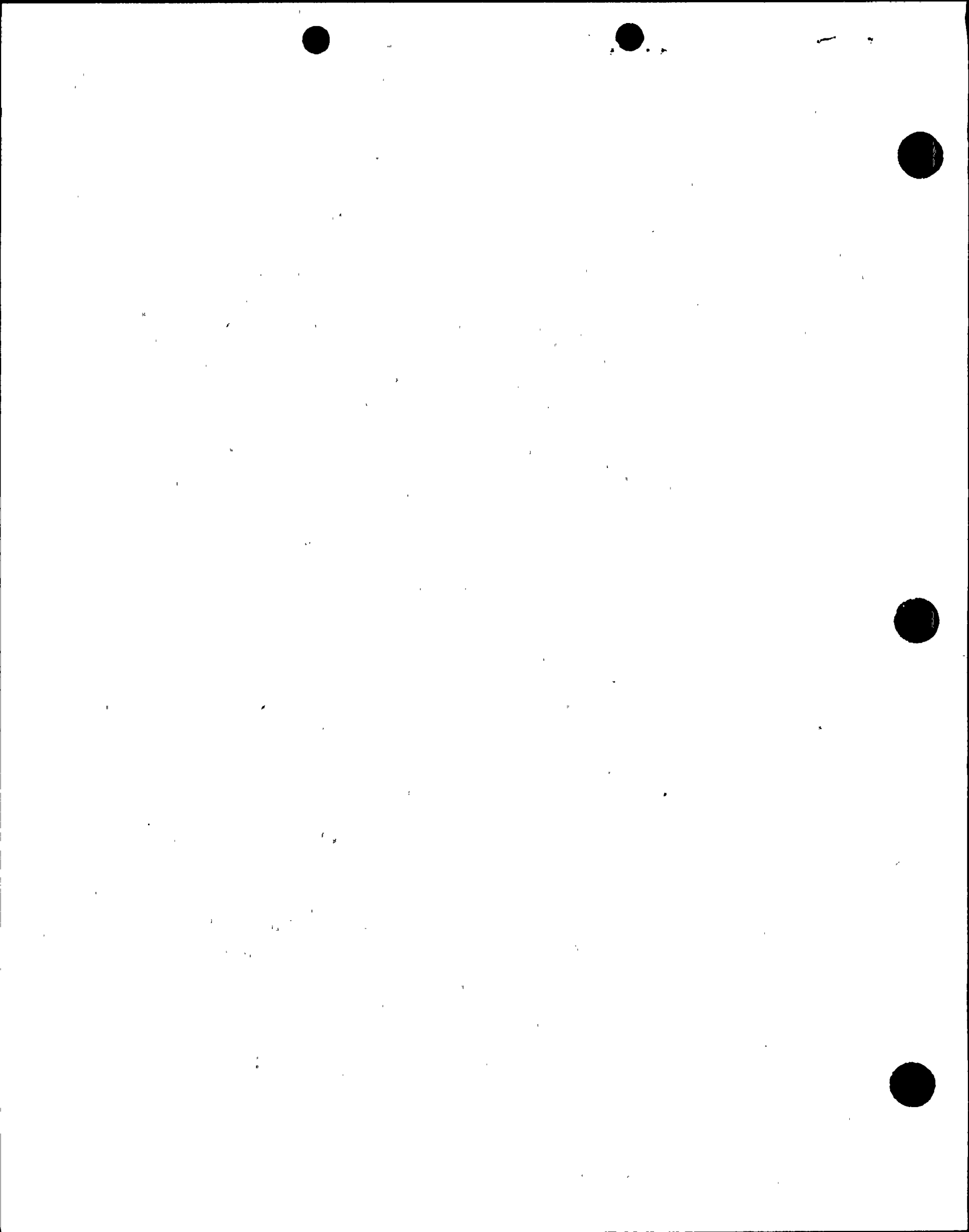
- Item A All Unit I and II instrument tubing supports were reinspected to locate those supported from pipe supports. Nine Unit I and three Unit II instrument supports were found to be attached to pipe supports, in violation of Drawing 049237, Paragraph 10, Revision 4. The twelve supports have been reviewed, found acceptable, and will be "As built" by July 20, 1979.
- Item B1 The nonvital raceways noted in the NRC report have been resupported to comply with drawing requirements.
- Item B2 The missing raceway support hanger noted in the NRC report will be installed by July 30, 1979.
- Item B1 A Unit I raceway support sample audit is being performed to determine if these nonconformances are isolated occurrences. The audit will be completed and results reviewed by July 16, 1979 to determine if additional inspection and corrective action is required.
- B2

The causes of the noncompliances are as follows:

- Item A Criteria for pipe support modification, shown on Drawing 049237, Paragraph 10, Revision 4, was not incorporated on Drawing 049238 which was used by the contractor for instrument hanger installation.
- Item B1 Failure of the contractor's Q.C. personnel to identify these raceway supports as nonconforming when they were inspected and accepted.

The actions taken to prevent recurrences are as follows:

- Item A PG&E Drawing 049238 will be revised by July 31, 1979 to incorporate the design requirements of Drawing 049237, Paragraph 10, Revision 4. The H. P. Foley Procedures, QCPM-1 and QCPM-2, for installation of instrumentation hangers have been updated to incorporate the requirements of Drawing 049237, Paragraph 10, Revision 4.
- Item B1 A formal training program will be conducted for selected PG&E and H. P. Foley Engineers and Inspectors during the month of July to insure that raceway supports are properly installed, inspected, and accepted.
- B2



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A separate letter will discuss the steps taken or actions planned to separate and/or preclude the association of nonsafety-related cables with redundant safety-related cables in order that no single failure results in loss of the protection function.

We notified Mr. Kirsch that our date of response would be extended beyond the one month from receipt of notice requirement. We trust this has caused no inconvenience.

Sincerely,

Philip A. Brown, J

cc: Director
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

