

APPENDIX A

NOTICE OF VIOLATION

Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant

Docket Nos. 50-275 and 50-323
License Nos. DPR-80 and DRP-82

During an NRC inspection conducted on April 26 through May 30, 1987, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. Facility Technical Specification 6.8.1 states that: "Written procedures shall be established, implemented and maintained covering... applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978..." Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Section 1j; specified procedures for "Bypass of Safety Functions and Jumper Control." In partial implementation of this requirement, Nuclear Plant Administrative Procedure C-4S1 "Mechanical Bypass, Jumper and Lifted Circuit Log Accountability" provides that "momentary jumpers...shall be listed on the attached form #69-9102-4, Momentary Jumper Status Sheet."

Contrary to the above, on May 14, 1987, while performing a loop test on operable emergency diesel generator 2-1, an I&C technician installed a "momentary" jumper across terminals of emergency start relay ESR1A without logging the jumper on the Momentary Jumper Status Sheet. With the jumper installed, if jacket water pressure switch PS 229 failed with its contacts closed, jacket water pressure relays JWPR1 and 1A would energize, immediately placing the diesel generator in a possibly inoperable condition.

This is a Severity Level IV Violation (Supplement I).

- B. Facility Technical Specifications 6.8.1 states that "Written procedures shall be established, implemented and maintained covering... applicable procedures recommended in Appendix A of Regulatory Guide 1.33 Revision 2, February 1978..." Appendix A of Regulatory Guide 1.33, Revision 2, Section 9d specified procedures for "Draining and Refilling the Reactor Vessel." In partial implementation of this requirement, an On-The-Spot-Change to Operating Procedure (OP) B-1:VI "RHR-Draining the Refueling Cavity" was issued and approved to control cavity and vessel pumpdown. OP B-2:VI, step 13, specified "when the water level in the refueling cavity has been lowered to approximately 1 foot below the reactor vessel flange, stop RHR pump 2-2 (Approx. 113' on RVRLIS or tygon tube indication)."

Contrary to the above, on May 12, 1987, during pumpdown of the Unit 2 refueling cavity with the reactor vessel defueled, operators failed to stop the residual heat removal pump 2-2 when reactor vessel water level reached 113' as indicated on RVRLIS, and proceeded to conduct plant evolutions outside the scope of the procedure without appropriate documented procedures or instructions. This resulted in vortexing the RHR pump on two occasions.



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

- C. 10 CFR 50.72 "Immediate notification requirements for operating nuclear power reactors," Section (b)(2) "Four-hour reports," specified the licensee "shall notify the NRC...within four hours of the occurrence of...any event or condition that results in manual or automatic actuation of any Engineered Safety Feature (ESF)...."

Contrary to the above, on May 14, 1987, emergency diesel generator 2-1 was inadvertently actuated at 1021 hours, and this ESF actuation was not reported to the NRC until 1615 hours.


This is a Severity Level IV Violation (Supplement VIII).

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector, Mr. L. M. Padovan, 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 for each violation: (1) the reason for the violation if admitted, (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, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other actions as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

JUN 23 1987

Dated at Walnut Creek, California



Dennis F. Kirsch, Director

Division of Reactor Safety and Projects

