

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8805110195 DOC. DATE: 88/05/03 NOTARIZED: NO DOCKET #
 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323

AUTH. NAME AUTHDR AFFILIATION
 WIRSCH, D. F. Region 5, Ofc of the Director
 RECIP. NAME RECIPIENT AFFILIATION
 SHIFFER, J. D. Pacific Gas & Electric Co.

SUBJECT: Ack receipt of 880412 ltr informing NRC of steps taken to
 correct violations noted in Insp Repts 50-275/88-03 &
 50-323/88-04.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 1
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTR	ENCL		LTR	ENCL
	PD5 PD	1	1	ROOD, H	2	2
INTERNAL:	ACRS	2	2	AEOD	1	1
	DEDRO	1	1	NRR MORISSEAU, D	1	1
	NRR/DLPQ/PEB 11	1	1	NRR/DLPQ/QAB 10	1	1
	NRR/DOEA DIR 11	1	1	NRR/DREP/EPB 10	1	1
	NRR/DREP/RPB 10	2	2	NRR/DRIS DIR 9A	1	1
	NRR/PMAS/ILRB12	1	1	NUDOCS-ABSTRACT	1	1
	DE LIEBERMAN, J	1	1	OGC 15-B-18	1	1
	REG FILE 02	1	1	RES/DRPS DEPY	1	1
	RGN5 FILE 01	1	1			
EXTERNAL:	LPDR	2	2	NRC PDR	1	1
	NSIC	1	1			

TOTAL NUMBER OF COPIES REQUIRED: LTR 26 ENCL 26



MAY 3 - 1988

Docket Nos. 50-275 and 50-323

Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

Attention: Mr. J. D. Shiffer, Vice President
Nuclear Power Generation

Gentlemen:

Thank you for your letter dated April 22, 1988, in response to our Notice of Violation and Inspection Report Nos. 50-275/88-03 and 50-323/88-04, dated March 28, 1988, informing us of the steps you have taken to correct the items which we brought to your attention. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,
Original signed by
D. F. Kirsch

Dennis F. Kirsch, Director
Division of Reactor Safety and
Projects

bcc w/copy of letter dated 4/22/88:

- Project Inspector
- Resident Inspector
- docket file
- G. Cook
- A. Johnson
- B. Faulkenberry
- J. Martin
- J. Zollicoffer

bcc w/o copy of letter:

M. Smith

REGION V

JBurdoin/dot
5/3/88

MMendonca
5/3/88

RZimmerman
5/ /88

DKirsch
5/3/88

REQUEST COPY]	REQUEST COPY]	REQUEST COPY]	REQUEST COPY]
YES / NO	YES / NO	YES / NO	YES / NO

SEND TO PDR]
YES / NO

8805110195 880503
PDR ADCK 05000275
Q PDR

Handwritten scribbles and marks at the bottom right of the page.



Pacific Gas and Electric Company

77 Bear Street
San Francisco, CA 94106
415 973 4000
TW 973 6500

James D. Shiffer
Vice President
Nuclear Regulatory Commission

April 22, 1988

PG&E 20088001

PG&E Letter No. DCL-88-102



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 a Notice of Violation in
NRC Inspection Report 50-275/88-03 and 50-323/88-04

Gentlemen:

NRC Inspection Report 50-275/88-03 and 50-323/88-04, dated March 28, 1988, contained a Notice of Violation citing two Severity Level IV violations concerning an unauthorized entry into a radiological controls area and failure of a Quality Control Inspector to perform a required inspection. PG&E's response to this Notice of Violation is provided in the enclosure.

The inspection report expressed an NRC concern that plant personnel were exceeding their bounds of authority and not seeking management guidance when difficulties are experienced with certain work activities. PG&E management shares this concern and as previously committed is taking and will continue to take appropriate action to communicate guidance as warranted.

For example, PG&E letter DCL-88-082, dated April 11, 1988, provided a description of the use of an operating incident summary report and the development of an administrative procedure to provide specific guidance on the proper method of reading and interpreting test instruments.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

J. D. Shiffer

cc: ~~James B. Martin~~
M. M. Mendonca
P. P. Narbut
B. Norton
H. Rood
B. H. Vogler
CPUC
Diablo Distribution

Enclosure

2068S/0057K/DJH/2009

8805626223 6pp.



ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN NRC
INSPECTION REPORT 50-275/88-03 AND 50-323/88-04

On March 28, 1988, as part of NRC Inspection Report No. 50-275/88-03 and 50-323/88-04 (Inspection Report) for Diablo Canyon Power Plant (DCPP) Units 1 and 2, NRC Region V issued a Notice of Violation citing two Severity Level IV violations. The statements of violation and PG&E's responses are as follows:

A. STATEMENT OF VIOLATION

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 7e(1) specifies procedures for "Access Control to Radiation Areas Including a Radiation Work Permit System." In partial implementation of this requirement, Radiation Control Standard 4, dated November 18, 1985, "Control of Access," in Section 3.3, "Entry into the Controlled Area," states in Paragraph 3.3.1: "Except as exempted by the Diablo Canyon Technical Specifications, written authorization (usually an SWP or RWP) is required for all entries into the Controlled area," and in Paragraph 3.3.3.: "Entry into the Controlled Area shall be made only through the normal established access control points."

Contrary to the above, on February 19, 1988, a licensee employee entered the Radiological Controls Area by stepping over a posted boundary at a point not established as a normal personnel access control point. Also, the individual did not have written authorization to enter the area.

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



REASON FOR THE VIOLATION IF ADMITTED

PG&E acknowledges that the violation occurred as indicated in the Inspection Report. While the individual was touring the perimeter of the plant he came to the posted barrier and mistakenly interpreted the posted requirement for the use of personnel monitoring devices to be fulfilled by his TLD. DCPD radiological controls require that entry into a radiological controlled area (RCA) be authorized by a Special Work Permit or Radiological Work Permit and further requires a minimum of a pocket ionization chamber in addition to a TLD for personnel monitorings.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The subject individual was appropriately counseled by his supervisor. A review determined that the existing RCA posting, procedures and training program were adequate. However, postings for the subject RCA were clarified to more clearly denote entry and exit points, and the barrier support was improved to reduce the amount of sag in the yellow-magenta rope delineating the RCA.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Based on the actions noted above, it has been determined that no further actions are necessary.



DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is presently in full compliance.

B. STATEMENT OF VIOLATION

10 CFR Part 50 Appendix B, Criterion X, "Inspection" states, in part, that "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify compliance with the documented instructions, procedures, and drawings for accomplishing the activity."

Quality Control Inspection Plant Number 88-0376, the inspection plan for the replacement of the valve seat diaphragm for Unit 1 Charging System valve 8484B, stated in Inspection Point Number 01 "QC Specialist Mechanical to visually examine the valve internals for cleanliness prior to close-up of the system."

Contrary to the above, on February 24, 1988, a Quality Control Inspector stamped and initialed his acceptance of cleanliness on the inspection plan without visually inspecting inside the body of Valve No. 8484B for cleanliness. Subsequently, the valve body was properly inspected.

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

REASON FOR THE VIOLATION IF ADMITTED

PG&E acknowledges that, as discussed in the Inspection Report, a Quality Control (QC) Inspector, on contract with PG&E, initialed his acceptance for maintenance being performed on a valve without visually inspecting its intervals. The valve in question was located inside a surface contamination area (SCA) and applicable health physics controls required individuals inside the SCA to wear respirators. When the inspection was



being planned, it was thought unlikely that a respirator would be required, and therefore, the QC Inspector assigned was not qualified to wear a respirator. The QC Inspector made a judgement error in that he examined the valve diaphragm and bonnet prior to installation but did not examine the valve internals since he was not respirator qualified and therefore, did not have access to the SCA. The QC Inspector had, however, verified with the Maintenance Mechanic that the valve body was clean.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The QC Inspector was appropriately counseled on his actions. In addition, the QC Manager also issued a memorandum to all QC Department personnel reiterating the importance of procedural compliance when implementing inspection plans and stressing the need to stop and notify supervision when the specific instructions of a QC inspection cannot be complied with. Quality Control Procedure (QCP) 10.2, "Inspection Activities," has been revised to require the QC Inspector to stop and notify supervision when the specific instructions of a QC inspection cannot be complied with. Additionally, QCP 10.2 has been revised to provide guidance for assigning QC Inspectors. This guidance ensures that respirator qualified inspectors are assigned to areas where the potential for respirator use exists during an inspection. This event and the corrective actions taken have been incorporated into the ongoing QC training program.



CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Based on the actions noted above, it has been determined that no further actions are necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is presently in full compliance.

