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SUBJECT: Discusses effectiveness of mgt oversight & corrective actions re excessive personnel overtime, per 900122 request.

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James D. Shiffer
Senior Vice President and
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Nuclear Power Generation

February 21, 1990

PG&E Letter No. DCL-90-049



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 NRC Request for Additional Information

Gentlemen:

On January 22, 1990, the NRC issued a letter requesting additional information regarding PG&E's evaluation of the effectiveness of management oversight and an assessment of the need for additional corrective actions regarding excessive personnel overtime without appropriate management approvals.

As stated in letters DCL-90-002 and DCL-90-011 dated January 2, 1990 and January 11, 1990, respectively, PG&E identified the root cause of personnel exceeding the Technical Specification overtime restriction as personnel error and a programmatic administrative breakdown due to a lack of specific guidance in administrative procedures on the applicability and implementation of the overtime restriction. PG&E provided further explanation of the programmatic breakdown during a telephone conference call with Mr. M. Mendonca during January 1990. This explanation clarified that PG&E acknowledges that management failed to take timely enough action. The explanation further clarified that in addition to the personnel error, the root cause of a programmatic breakdown and a lack of procedural guidance included inadequate plant management oversight. In addition, it was clarified that the majority of personnel exceeding the restrictions were maintenance personnel reporting to the maintenance manager.

PG&E has taken corrective actions to address the problem. These actions are as indicated in your letter of January 22, 1990, and included the following. A memorandum from the Maintenance Manager was issued to all maintenance personnel. In addition, a memorandum was issued from the Plant Manager to all plant personnel including Assistant Plant Managers, department heads, and supervisors, informing personnel of the importance of complying with the overtime restriction and to ensure that plant management provided adequate oversight of overtime usage. Also, supervisors and time clerks received specific instructions concerning the tracking and reporting of personnel hours worked. Administrative Procedure AP A-8, "Overtime and Emergency Relief Restrictions," has been revised to provide clarification and clear direction to personnel and supervisors on the TS overtime restriction. This procedure revision states that all personnel, including contractors, who are performing

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work, directing tests, preparing work orders or writing procedures on plant equipment, both safety related and non-safety-related, whether in the plant or elsewhere (e.g., shops), and their immediate supervisors, are subject to the overtime restrictions of Technical Specification 6.2.2.f. The following departments are currently planned to be subject to these restrictions:

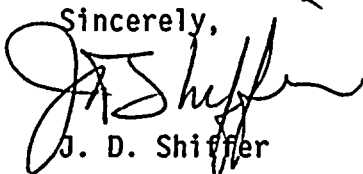
- a. DCPM Mechanical Maintenance
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- d. Radiation Protection
- e. Operations
- f. Chemistry
- g. General Construction
- h. Work Planning
- i. Plant Engineering
- j. Telecommunications
- k. Quality Control
- l. Inservice Inspection

Although not specifically discussed in our letters, as a requirement of our administrative procedure revision process, all personnel will receive training on the newly revised overtime procedure. In order to provide additional verification that overtime is being adequately controlled, continuing monthly verification is made by each department head using time records that indicate personnel overtime worked. Although this review will not prevent isolated cases of personnel exceeding the overtime restrictions since it is an after the fact review, it will provide the necessary mechanism to prevent a systematic breakdown in the implementation of the overtime control program. In addition, Quality Control will monitor the effectiveness of the corrective actions by performing a surveillance of personnel work hours during the upcoming Unit 2 refueling outage, scheduled to begin March 4, 1990.

In summary, PG&E believes that there currently exists adequate management oversight of overtime usage and believes the above information provides further clarification regarding the root causes described in letters DCL-90-002 and DCL-90-011. The above clarification of the corrective actions described in these letters should provide adequate assurance that overtime usage is adequately controlled.

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: A. P. Hodgdon
J. B. Martin
M. M. Mendonca

P. P. Narbut
H. Rood
CPUC
Diablo Distribution

Enclosure

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