

APPENDIX A

NOTICE OF VIOLATION

Pacific Gas and Electric Company  
Diablo Canyon Unit 1

Docket Nos. 50-275  
License Nos. DPR-80

During an NRC inspection conducted on March 14, 1994, a 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:

Diablo Canyon Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, recommends procedures involving draining and refilling of the recirculation loops, and the reactor vessel.

1. Step 6.4 of Plant Procedure OP A-2:II, Revision 11 (XPR), "Reactor Vessel - Draining the RCS to the Vessel Flange - With Fuel in Vessel" states, in part "Place NR RVRLIS (narrow range reactor vessel level indication) and the Vent Cross-tie in service as follows..."

Contrary to this requirement, on March 14, 1994, during RCS draindown operations, the vent cross-tie was not placed in service before draindown of the RCS continued, resulting in an abrupt change in RCS level of over six feet when the vent cross-tie was placed in service during performance of a later step in the procedure.

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

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, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (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, or, if contested, the basis for disputing the violation, (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 or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California  
this 1<sup>st</sup> day of April, 1994

