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 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 941116 ltr re violations noted in insp repts
 50-275/94-25 & 50-323/94-25. Corrective actions: thermowell
 drain adapter & discharge line provided to control water
 from remaining Unit 2 RTD installation sys breach activity.

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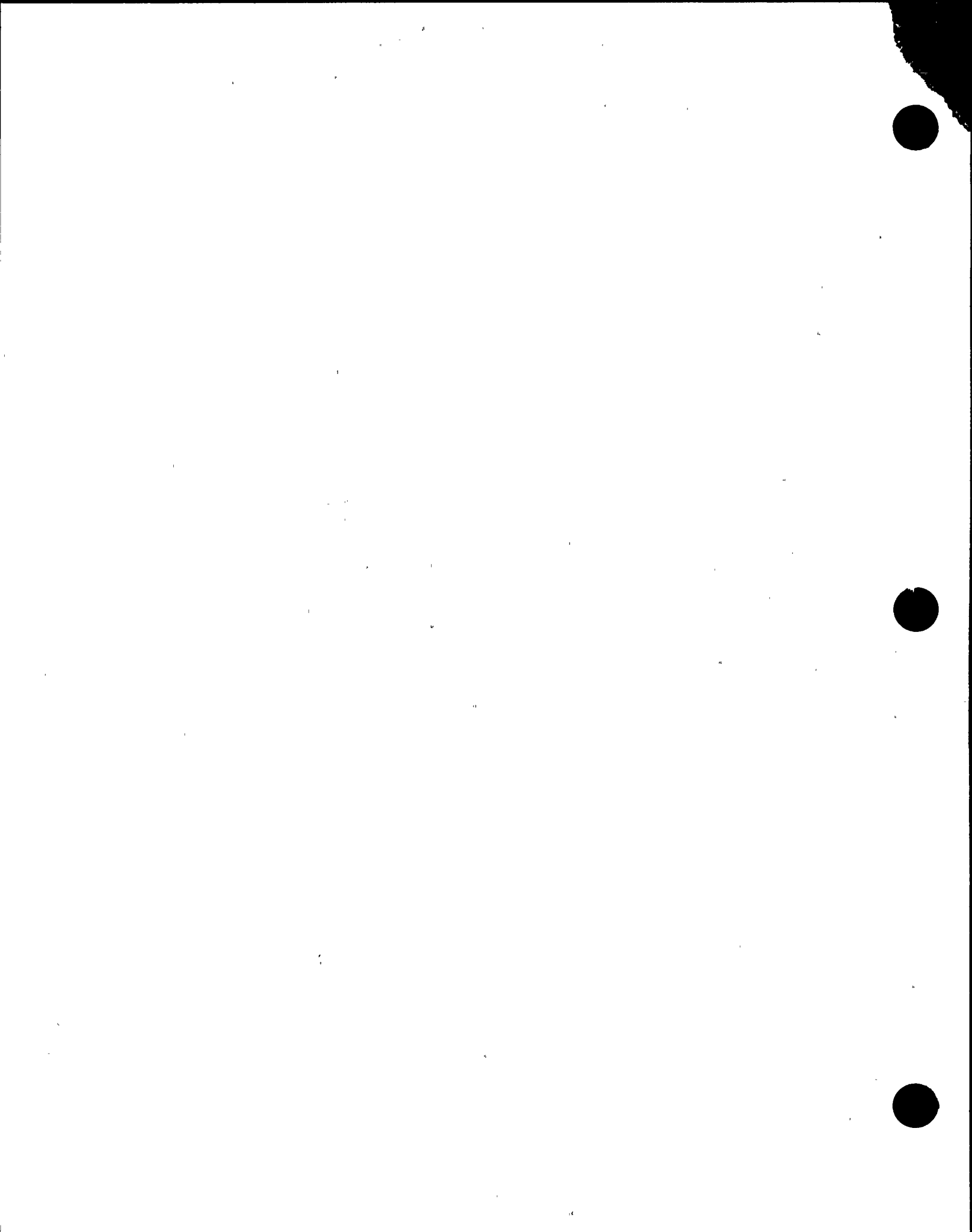
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Gregory M. Rueger
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December 15, 1994



PG&E Letter DCL-94-282

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Reply to Notice of Violation in NRC Inspection
Report Nos. 50-275/94-25 and 50-323/94-25

Gentlemen:

NRC Inspection Report Nos. 50-275/94-25 and 50-323/94-25, dated November 16, 1994, contained one Severity Level IV violation regarding the failure to adequately document a contaminated water spill and failure to provide adequate instructions appropriate for the resistance temperature detector modification project to preclude a contaminated water spill. PG&E's response to the Notice of Violation is enclosed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg M. Rueger', with a long horizontal flourish extending to the right.

Gregory M. Rueger

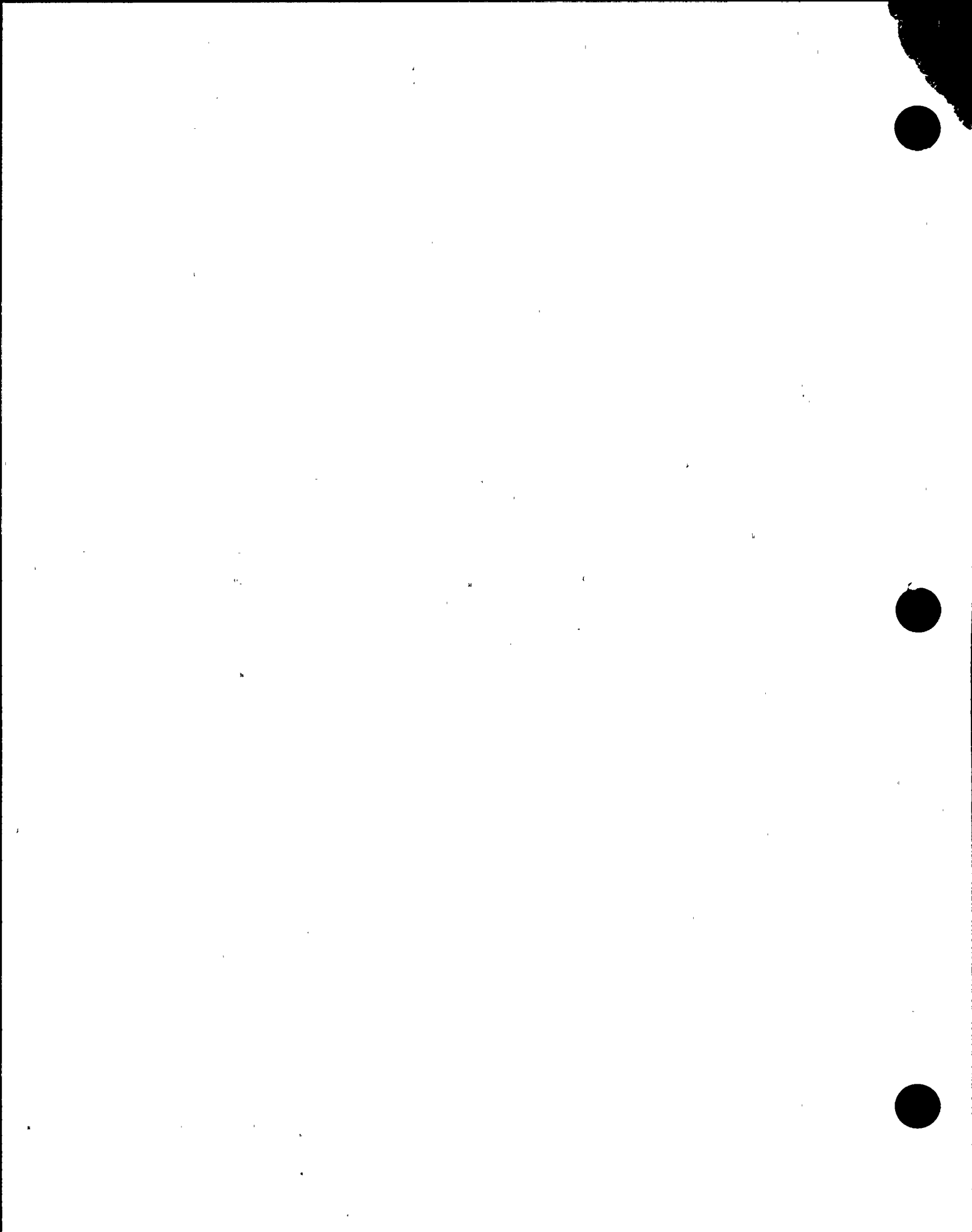
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PDR

Handwritten initials in black ink, possibly 'JED', with a vertical line extending upwards from the right side.



ENCLOSURE 1

REPLY TO NOTICE OF VIOLATION IN
NRC INSPECTION REPORT NOS. 50-275/94-25 AND 50-323/94-25

On November 16, 1994, as part of NRC Inspection Report Nos. 50-275/94-25 and 50-323/94-25, NRC Region IV issued one Severity Level IV violation regarding the failure to adequately document a contaminated water spill and failure to provide adequate instructions appropriate for the resistance temperature detector modification project to preclude a contaminated water spill. PG&E's response to the Notice of Violation is as follows:

DESCRIPTION OF THE VIOLATION

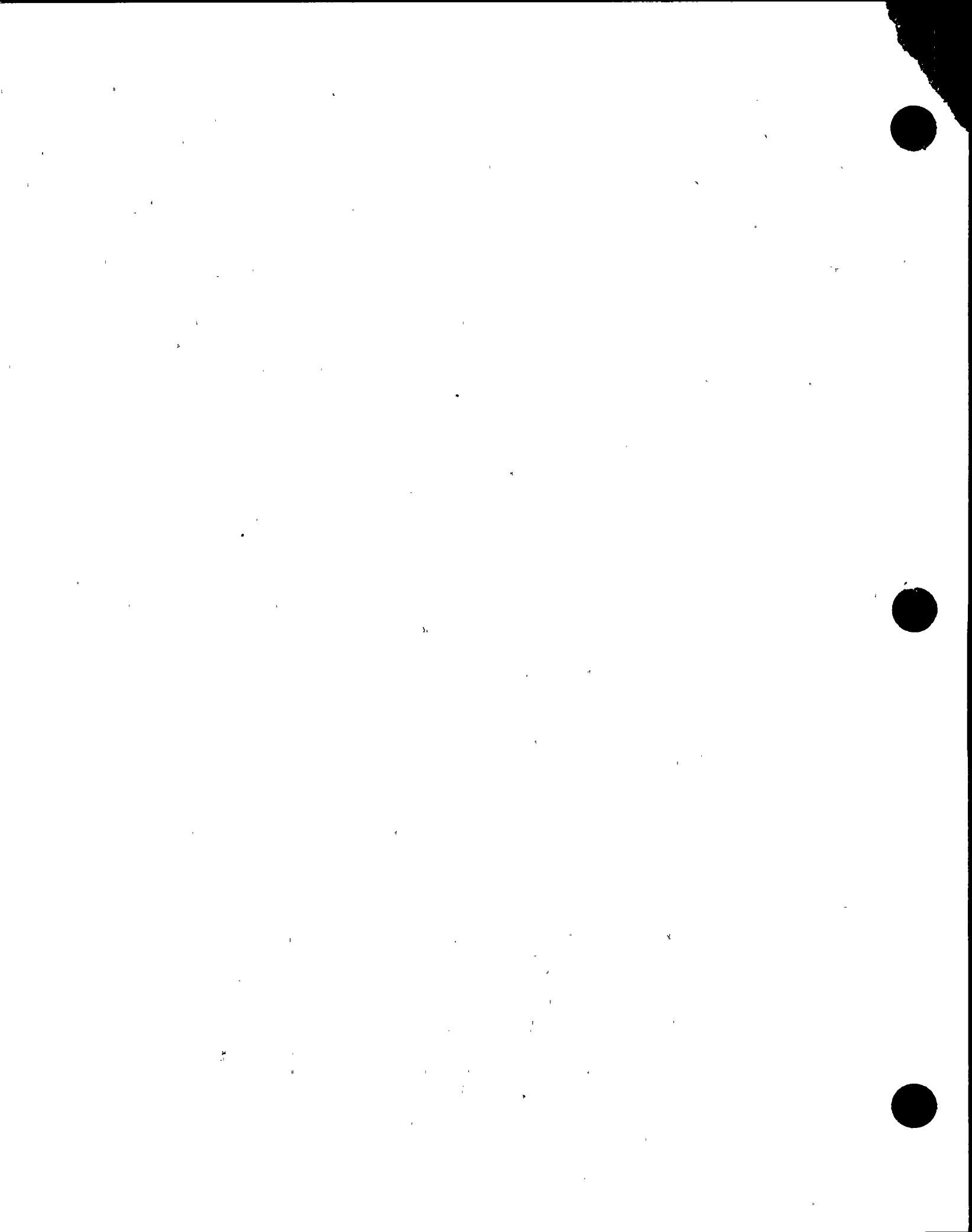
During an NRC inspection conducted on September 26 through October 7, with the in-office inspection through October 28, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C, the violation is listed below:

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and shall be accomplished with these documented instructions, procedures, or drawings.

Administrative Procedure OM7.ID1 requires the documentation of all identified hardware-related or administrative problems relative to nuclear power generation activities, through the initiation of an action request, so that the cause of the problems can be identified and actions developed to ensure the problems do not happen again or to reduce the chance of the problems recurring.

Contrary to the above:

- A. Documented instructions were not appropriate to the circumstances for the resistance temperature detector modification project on Unit 2, in that they did not provide adequate measures for controlling or containing reactor coolant system water that spilled out of the Loop 1 hot leg during machining operations on October 5, 1994, during Refueling Outage 2R6. (A similar event occurred in Unit 1 during Refueling Outage 1R6).



- B. An action request to document a problem was not initiated during Refueling Outage 1R6 (between March 12 and May 7, 1994) to identify the cause of a reactor coolant system water spill during the resistance temperature detector modification project on Unit 1, and to develop actions to ensure that the problem did not recur.

This is a Severity Level IV violation (Supplement 1).

REASON FOR THE VIOLATION

PG&E agrees with the violation as stated in the Inspection Report.

During the Unit 1 sixth refueling outage (1R6) and the Unit 2 sixth refueling outage (2R6), the resistance thermal detector (RTD) bypass piping network was removed and new RTD thermowells were installed. Due to the multidiscipline impact of this project, PG&E initiated a high impact team (HIT) to review the scope of work, scheduling and support functions required by each of the various work groups involved.

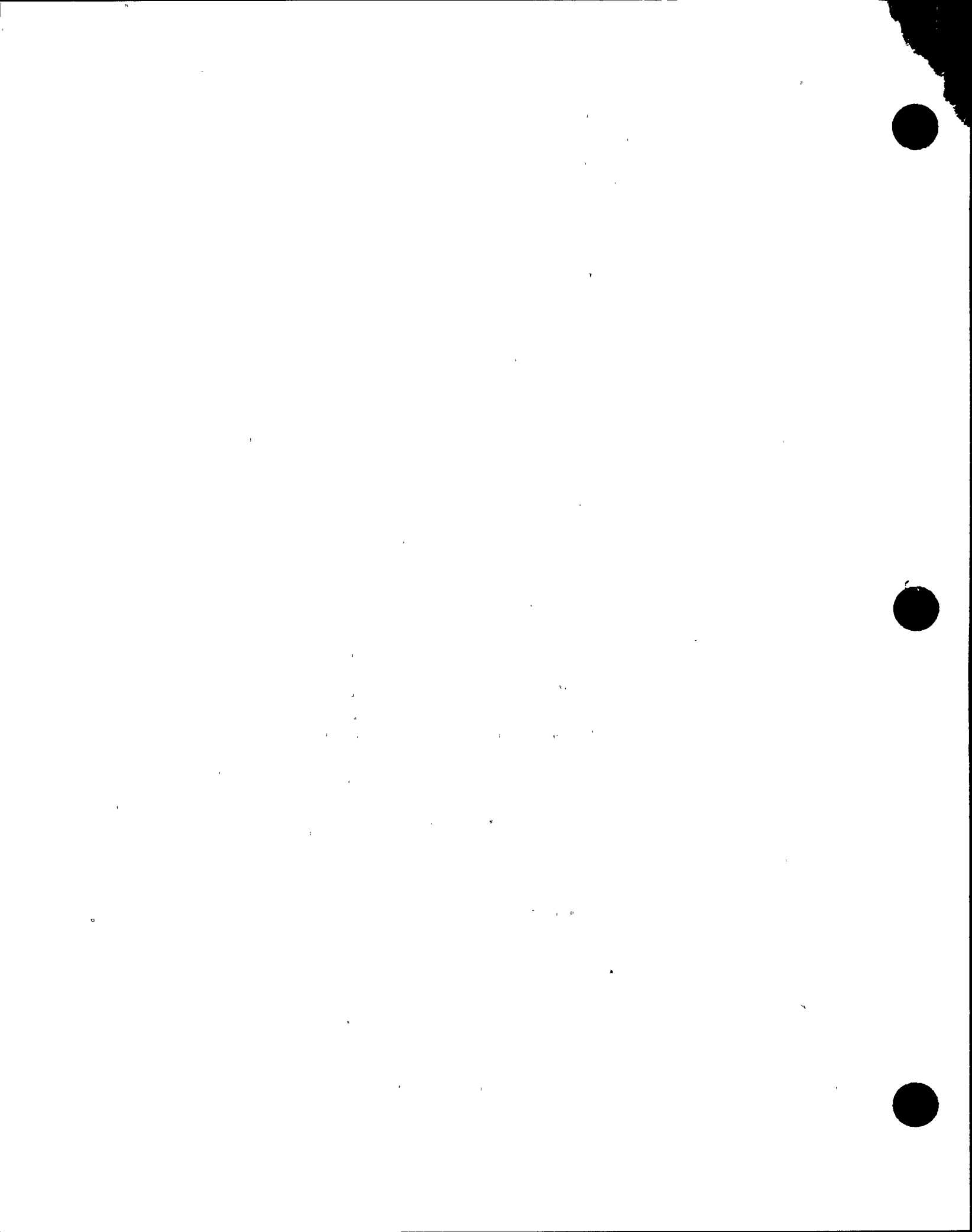
During the 1R6 project a large drip bag (approximately six foot diameter) was utilized to control the anticipated water flow and drainage that might result from metal disintegration machining (MDM) process from the reactor coolant system breach. Protective clothing precautions were specified to protect personnel from possible contamination due to the potential exposure to contaminated water. The drip bag was effective in containing the water during the system breach; however, due to the scaffolding and MDM equipment configuration, the drip bag was required to be moved when the MDM equipment was removed, resulting in a small liquid spill (estimated 15 gallons) when the drip bag was pushed aside. The spill was promptly controlled by radiation protection (RP) personnel and no personnel contamination resulted.

The 1R6 experience was evaluated by the HIT team members for improvement of the 2R6 work activities. The HIT team recommendations included, the use of the electro-discharge machining (EDM) equipment instead of the MDM equipment for the system breach, scaffolding configuration changes and a smaller (approximately three foot diameter) drip bag for improved work access.

On October 5, 1994, during the 2R6 Loop 1 hot leg breach and removal of the EDM equipment a large quantity of water was released from the system. The water quickly filled up the drip bag and overflowed (estimated 90 gallons).

Although precautions were taken to contain the anticipated water and protect personnel from contamination, PG&E agrees that a more thorough pre-job planning process could have prevented the spill of contaminated water.

PG&E further agrees that the HIT team process was inadequate to prevent a second contaminated water spill.



CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A thermowell drain adapter and discharge line were provided to control the water from the remaining Unit 2 RTD installation system breach activities. No further contaminated water spills occurred as a result of the RTD thermowell installation activities.

A case study of this event has been prepared for review by construction and plant personnel to heighten awareness of management expectations for proper planning of work during a system breach and to emphasize the need to initiate appropriate problem identification documentation.

Administrative Procedure AD7.NC2, "Conduct of Work," has been issued to provide guidance to ensure construction work activities are conducted in a safe, consistent, and effective manner. This procedure provides specific guidance to consider planning, proper equipment, and materials for handling potential anticipated/unanticipated water releases.

PG&E believes the corrective actions taken described above should be effective and no further actions are necessary.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance.

