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PG&E Letter DCL-95-209



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  
Completion of ASLB Issues – Construction Period Recovery

Gentlemen:

In its November 4, 1994 Initial Decision (LBP-94-35) on construction period recovery for Diablo Canyon Power Plant (DCPP), Units 1 and 2, the Atomic Safety and Licensing Board (ASLB) authorized the NRC staff to extend the expiration dates of the DCPP operating licenses and directed the NRC Staff to confirm that PG&E had addressed three issues associated with the DCPP maintenance program. The Initial Decision became final on February 13, 1995. PG&E has completed all activities related to these issues and is submitting the information described below to the NRC. By letter dated December 9, 1994 (DCL-94-269), PG&E informed the NRC that we would complete all work and provide appropriate reports to the NRC by the end of 1995.

#### 1. Telatemp Sticker Program Improvement

In its Initial Decision, the ASLB identified certain issues in PG&E's Telatemp Sticker Program, and the Board raised questions regarding the accuracy of Telatemp measurements. The ASLB stated:

*"The telatemp sticker program must be improved .... These improvements need be made only to the extent PG&E determines to use such a program in fulfilling its EQ requirements."*

PG&E has reviewed its Telatemp Sticker Program and revised the appropriate maintenance procedure to the extent necessary to ensure that environmental qualification requirements continue to be met.

At the time of the construction period recovery hearings in August 1993, PG&E's Maintenance Procedure (MP) E-57.8A, Revision 4, "Temperature Monitoring,"

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for the control and use of Telatemp stickers did not address the use of Telatemp stickers on Instrumentation and Control (I&C) instruments because the procedure was intended to be a guidance document for the installation and use of Telatemp stickers on electrical equipment only. In November 1993, this procedure was revised to include the I&C equipment that use Telatemp recording stickers. Therefore, the procedure now includes a complete list of electrical and I&C equipment with Telatemp recording stickers as Appendix 8.3 and Appendix 8.4, respectively. The appendices are specific in terms of addressing the equipment to be monitored, in addition to the number, location, and temperature range of the stickers to be used.

The revised procedure also incorporates more detailed instructions in Section 7.0 on the installation, removal, and data recording of the Telatemp stickers. Steps were also included to further define the use of the term "N/A" (not applicable/available), including a discussion of its use in the remarks section of the revised data sheet. This revision ensures that the information recorded on the data sheet is accurate, understandable, and meets the requirements of the ASLB's concerns.

In an effort to continually monitor and enhance our program by applying state-of-the-art technology, the procedure was revised again in August 1994. This latest Revision 7 incorporates the use of miniature temperature data loggers. The data loggers are calibrated test equipment that can be left in place to digitally record a temperature profile for any predetermined length of time. Being NIST-traceable test equipment, there is more control over the accuracy associated with the measured temperature profile. In addition to describing the use of these new data loggers, the revised procedure includes new data sheets to control the installation, reading, and removal of these data logger devices.

PG&E anticipates that the scope and necessity for the equipment temperature monitoring program will be periodically evaluated as additional experience and temperature data are obtained. For example, temperature monitoring may be modified in equipment areas that are consistently below temperatures assumed in the environmental qualification files.

A copy of Procedure MP E-57.8A, Revision 7, "Temperature Monitoring," is provided in Enclosure 1.

## 2a. Radiation Monitoring System

The ASLB also raised issues concerning the conversion of the radiation monitoring system that was ongoing at the time of the ASLB hearings in August 1993. The ASLB stated:

*"Conversion of the radiation monitoring system must be completed ...."*



PG&E has completed installation of those portions of the new radiation monitoring system that will minimize the sensitivity of the system to electrical noise to reduce inadvertent containment ventilation isolation (CVI) actuation in the plant. The ASLB was concerned with numerous inadvertent CVIs due to personnel error during calibration of the radiation monitors associated with the previously installed CVI logic. The prior CVI logic initiated a CVI if certain designated radiation monitors reached their alarm setpoint or their output relays were de-energized. Previously, it was not uncommon for the calibration procedures to specify as an initial step that the CVI outputs be neutralized by lifting the leads or pulling the output relays. Accidentally shorting the leads or touching the wrong terminals with a screwdriver, had been, in many cases, sufficient to drop the voltage to the CVI relays and lock in the CVI.

Completion of an upgrade to the digital radiation monitoring system resolved these concerns. The new system is a more reliable microprocessor-based system with built-in bypass capability. This bypass capability allows the CVI actuation circuit to be disabled while technicians are preparing for the routine calibrations. These features of the new monitors have prevented the past inadvertent CVIs from recurring.

## **2b. Requirements for Working on Energized Equipment**

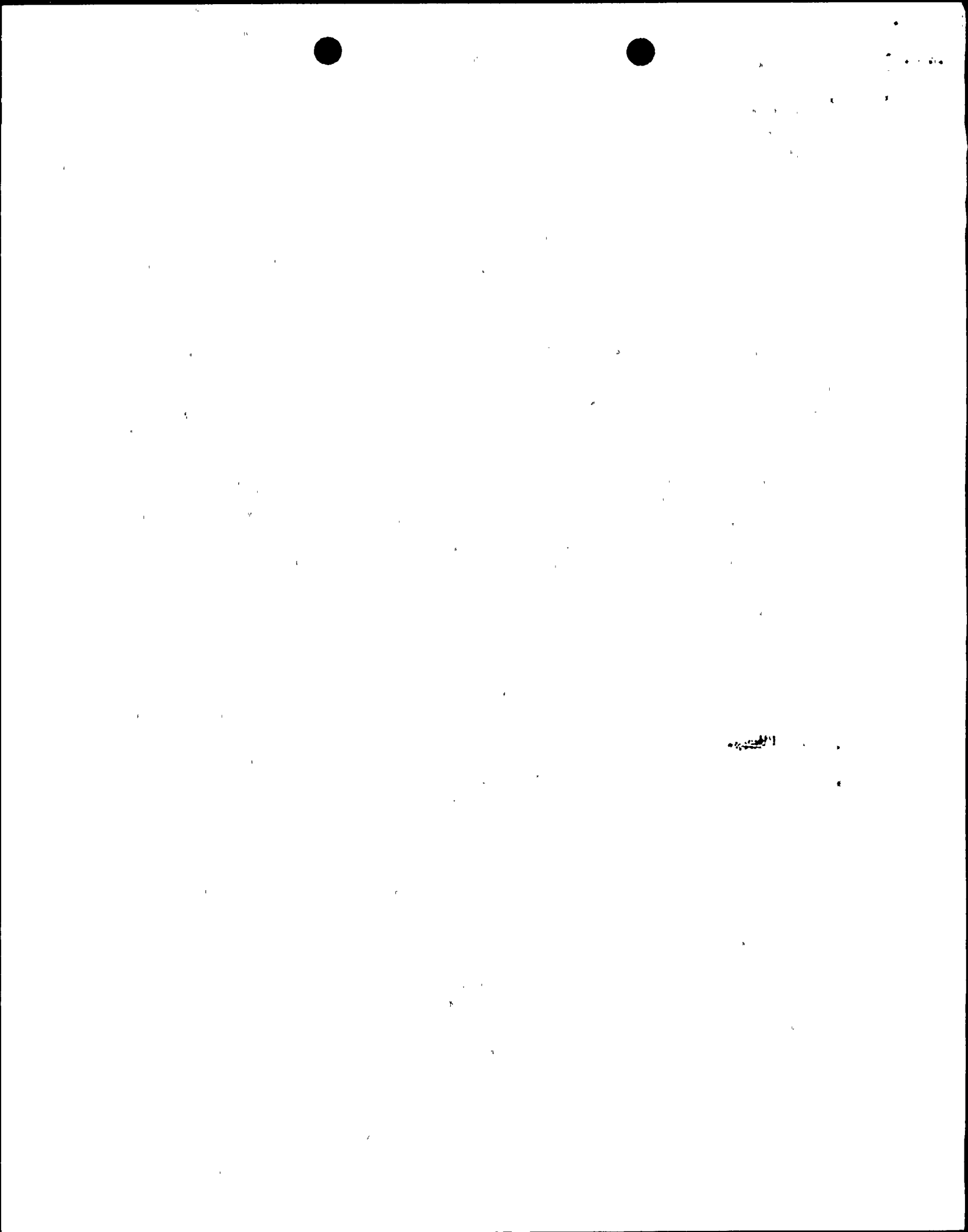
The ASLB stated:

*"... a set of rules for working on energized equipment [must] be promulgated."*

In accordance with the ASLB's concerns, PG&E has reviewed and appropriately enhanced existing requirements for working on energized equipment. This included the development of a specific list of precautions to be followed by personnel working on energized equipment. A copy of the enhanced Technical Maintenance Policy for "Work On Energized Equipment," issued August 29, 1995, is provided in Enclosure 2.

Additionally, MP E-57.11A, Revision 7, "Safety Precautions When Working On Potentially Energized Equipment," includes safety precautions and requirements to be followed when workers are performing maintenance on energized equipment. A copy of this procedure is provided in Enclosure 3.

Additional work procedures and maintenance bulletins have appropriate precautions to alert technicians to special problems that might be encountered in specific situations when working on energized equipment.





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### 3. Improve Maintenance Communication

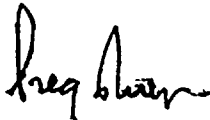
The ASLB stated:

*"PG&E must undertake a study, to be submitted to the [NRC] Staff for review, concerning methods for improving communications between maintenance and other departments, to the extent maintenance elects to use those departments in implementing its maintenance and surveillance program."*

In accordance with the ASLB's direction, PG&E performed a study to examine methods for improving communications between the Maintenance Department and other departments, to the extent the Maintenance Department uses other department personnel in conducting its maintenance and surveillance program activities. A copy of this study titled "Maintenance Communication Study," dated September 1995, is provided in Enclosure 4.

In summary, we believe that the actions taken for each of the issues associated with the DCPM maintenance program resolve the ASLB's concerns, and that these issues have been satisfactorily completed.

Sincerely,



Gregory M. Rueger

cc: L. J. Callan  
Ann P. Hodgdon  
James C. Stone  
Kenneth E. Perkins (w/o enc.)  
Michael D. Tschiltz  
Diablo Distribution

Enclosures

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ENCLOSURE 1

MAINTENANCE PROCEDURE MP E-57.8A, REVISION 7

TEMPERATURE MONITORING

