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SUBJECT: Responds to NRC 960731 ltr re violations noted in insp repts 50-275/96-14 & 50-323/96-14.Corrective actions:counseled shift foreman,issued amended scheduling policy & implemented new Administrative Procedure AD7.DC6.

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August 29, 1996

PG&E Letter DCL-96-188

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Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Response to a Notice of Violation in Inspection Report Nos. 50-275/96-014 and 50-323/96-014

Dear Commissioners and Staff:

NRC Inspection Report Nos. 50-275/96-014 and 50-323/96-014, dated July 31, 1996, included two Severity Level IV statements of violation. These two statements of violation were: (1) the failure to follow the precautions in a surveillance test procedure which resulted in two residual heat removal pumps being inoperable, and (2) the failure to remove action request stickers, in accordance with procedures, from control panels after problem resolution was completed.

PG&E's reply to the notice of violation and response to the concern are enclosed.

Sincerely,

Gregory M. Rueger

cc: Steven D. Bloom
L. J. Callan
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Enclosure

SDL/JER/2237/N0001989/Q0011896

REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-275/96014 AND 50-323/96014

On July 31, 1996, as part of NRC Inspection Report (IR) Nos. 50-275/96014 and 50-323/96014, NRC Region IV issued a NOV to Diablo Canyon Power Plant (DCPP), Units 1 and 2. The statements of violation and PG&E's response are documented below.

STATEMENT OF VIOLATION 1

1. *Diablo Canyon Technical Specification 6.8.1.a requires written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.*

   Appendix A of Regulatory Guide 1.33, Section 8.b, states that specific procedures shall be written for surveillance tests, inspections, and calibrations listed in the Technical Specifications.

   Procedure STP I-38-B.1, "SSPS Train B Actuation Logic Test in Modes 1, 2, 3 or 4," was written and implemented by the licensee to satisfy Technical Specification required periodic testing of the plant solid state protection system (SSPS). Step 7.2 of Procedure STP I-38-B.1 required that ". . . if any ESF equipment in Train A is known to be inoperable, then do not perform this test unless it is known TS LCOs will not be violated."

   Contrary to the above, on June 13, 1996, while in Mode 1, operations and technical maintenance personnel failed to follow Procedure STP I-38-B.1, Step 7.2, when the procedure was performed on SSPS Train B with the residual heat removal pump Train A inoperable, violating the Technical Specification Limiting Condition for Operation 3.5.2.

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

REASON FOR THE VIOLATION 1

PG&E agrees with the violation as stated in the IR.

On June 12, 1996, Residual Heat Removal (RHR) Pump 1-2 (Train A) was taken out-of-service for scheduled maintenance.

On June 13, 1996, at approximately 1300 PDT, the shift foreman (SFM) conducted a review of solid state protection system (SSPS) Surveillance Test Procedure (STP) I-38-B.1, "SSPS Train B Actuation Logic Test in Modes 1, 2, 3,

or 4," with technicians and Operations personnel to describe the test, discuss expected alarms, review breaker operations, and other operational concerns. The SFM believed the already inoperable RHR Pump 1-2 was a Train B component and that the test would not affect RHR Pump 1-1.

At 1321 PDT, in accordance with STP I-38-B.1, a technician closed Reactor Trip Bypass (RTB) Breaker 52/BYB. This allows the test to proceed so that automatic actuation of Train B components is inhibited. The automatic start feature of RHR Pump 1-1 was defeated. This resulted in an inadvertent entry into Technical Specification (TS) 3.0.3 due to violation of TS 3.5.2, "ECCS Subsystems - Tavg Greater Than or Equal to 350 °F."

At 1414 PDT, the technician reopened RTB 52/BYB, which completed the test steps that had temporarily rendered RHR Pump 1-1 inoperable.

Later in the shift, technicians requested permission to perform a related STP on SSPS Train B. The SFM decided to verify RHR Pump 1-2 to be a Train B component. At 1745 PDT, the SFM discovered it was a Train A component and identified there had been an inadvertent TS 3.0.3 entry.

At 1808 PDT, PG&E made a 1-hour, non-emergency report to the NRC in accordance with 10 CFR 50.72(b)(1)(ii).

The cause of this event was personnel error (cognitive) in that the licensed SFM thought RHR Pump 1-2 was a Train B component. He did not verify whether this was correct.

Contributing causes to this event were: (1) The SFM did not follow a working level procedure (personnel error). The precautions of STP I-38-B.1 require this test not to be run if any Train A components are known to be inoperable. (2) No requirements existed to identify to Operations personnel known potential equipment train conflicts caused by schedule changes (programmatic deficiency). STP I-38-B.1 had been rescheduled from earlier in the week due to conflicts with recovery actions from a reactor trip.

For additional information, see PG&E Letter (DCL-96-148) Licensee Event Report 1-96-010-00, "Entry Into TS 3.0.3 When Both Residual Heat Removal Pumps Were Inoperable Due to Personnel Error," dated July 15, 1996.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The SFM was counseled on responsibilities for self-verification when authorizing STPs.

2. An amended scheduling policy was issued jointly by the Operations scheduling supervisor and the daily scheduling supervisor on July 5, 1996. It directs work planners to identify in weekly work schedules those components that could create engineered safety feature train-related conflicts.

3. A new Department Level Administrative Procedure, AD7.DC6, "On-Line Maintenance Risk Assessment," was implemented on June 28, 1996. It requires the shift supervisor or SFM to evaluate the current plant state for probabilistic risk and safety function degradation for removing any risk significant system, structure, or component from service for maintenance. In addition to quantifying the risk significance of out-of-service safety equipment, this procedure provides a second check of train related TS requirements.

CORRECTIVE ACTIONS TO BE TAKEN TO PREVENT RECURRENCE

This event will be reviewed in licensed operator requalification training to emphasize self-verification.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance. A review of this event in licensed operator requalification training will be completed by November 30, 1996.

STATEMENT OF VIOLATION 2

2. *10 CFR Part 50, Appendix B, Criterion V (Instructions, Procedures and Drawings), 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 in accordance with these instructions, procedures or drawings.*

   Diablo Canyon Administrative Procedure OM7.ID1, Revision 6, "Problem Identification and Resolution - Action Requests," Section 5.8.7, requires that action request (AR) stickers in the control room shall be removed after problem resolution prior to closure of the AR.

   Contrary to the above, on May 15, 1996, the inspector noted that five AR stickers attached to annunciators, indications and controls on the Unit 1 main control boards had not been removed after problem resolution prior to closure of the AR.

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

REASON FOR THE VIOLATION 2

PG&E agrees with the violation as stated in the IR. PG&E considers the failure to remove control board action request (AR) stickers as a recurring quality problem.

AR Sticker #1

On September 25, 1995, an AR A0379590, "RHR PP 1-1," was initiated to investigate the inadvertent starting of Residual Heat Removal (RHR) Pump 1-1. An AR sticker was placed on the RHR Pump 1-1 control switch located on the Unit 1 control room board to identify a problem with an RHR Pump 1-1 supply breaker in accordance with Inter-Departmental Administrative Procedures (IDAPs) OM7.ID1, Revision 6, "Problem Identification and Resolution - Action Requests" and OP2.ID2, Revision 4, "DCPP Tagging Requirements."

On September 27, 1995, the RHR Pump 1-1 supply breaker was replaced with a spare breaker.

On October 4, 1995, the work activities associated with the original RHR Pump 1-1 supply breaker was completed.

On March 8, 1996, AR A0379590 was taken to the complete status. The associated AR sticker was not removed in accordance with IDAPs OM7.ID1 and OP2.ID2.

On May 15, 1996, the NRC resident inspectors performed a walkdown of the Unit 1 main control board and identified that the AR sticker for AR A0379590 had not been removed.

The cause of this event was a combination of multiple personnel errors and two programmatic weakness. The personnel errors were on the part of the Technical Maintenance (TM) technician, TM foreman, and TM planner involved. The programmatic weaknesses include: (1) deficiencies in the work order and AR closure processes in that the roles and responsibilities for AR sticker removal were not clearly identified and (2) deficiencies in the plant information management system (PIMS), in that PIMS was re-programmed to automatically place a "Y" (yes) in the AR tag removal block when an AR was taken to a completed status. This program change allowed the user to complete the AR without answering the question "AR Tag Removed?"

AR Sticker #2

On November 18, 1995, AR A0386591, "PK 0106 in Alarm," was initiated to investigate an annunciator alarm related to component cooling water (CCW) flow to RHR Heat Exchanger 1-2. An AR sticker was placed on the Main Control Board Annunciator PK01-06, "CCW Vital HDR A/B" to identify a problem with the annunciator in accordance with IDAPs OM7.ID1 and OP2.ID1.

On March 22, 1996, the problem associated with the Main Control Board Annunciator PK01-06 was resolved.

On April 20, 1996, AR A0386591 was taken to the completed status. The associated AR sticker was not removed in accordance with IDAPs OM7.ID1 and OP2.ID2.

On May 15, 1996, the NRC resident inspectors performed a walkdown of the Unit 1 main control board and identified that the AR sticker for AR A0386591 had not been removed.

The causes of this event were multiple personnel errors, deficiencies in training, and the same programmatic weaknesses identified for AR Sticker #1.

AR Sticker #3

On July 21, 1995, AR A0374495, "CHG PP 1-3 No Load Speed Too Low," was initiated to investigate a problem with the speed controller on Positive Displacement Pump (PDP) 1-3. An AR sticker was placed on the Unit 1 Main Control Console CC-2 at Hand Controller HC-459A to identify a problem with the PDP 1-3 speed controller in accordance with IDAPs OM7.ID1 and OP2.ID2

On February 10, 1996, the work activities associated with the PDP speed controller were completed.

On March 22, 1996, AR A0374495 was taken to the completed status. The associated AR sticker was not removed in accordance with IDAPs OM7.ID1 and OP2.ID2.

On May 15, 1996, the NRC resident inspectors performed a walkdown of the Unit 1 main control board and identified that the AR sticker for AR A0374495 had not been removed.

The causes of this event were multiple personnel errors and the same programmatic weaknesses identified for AR Sticker #1.

AR Sticker #4

On December 17, 1995, AR A0389020, "PR-507 (STM GEN Header Press) Sticks," was initiated to investigate a problem with the Unit 1 main steam header pressure recorder (PR). An AR sticker was placed on the Unit 1 Main Control Board VB-3 at PR-507 to identify a problem with the Unit 1 main steam header PR in accordance with IDAPs OM7.ID1 and OP2.ID2.

On December 29, 1995, work associated with PR-507 was completed.

On February 5, 1996, AR A0389020 was taken to the completed status. The associated AR sticker was not removed in accordance with IDAPs OM7.ID1 and OP2.ID2.

On May 15, 1996, the NRC resident inspectors performed a walkdown of the Unit 1 main control board and identified that the AR sticker for AR A0389020 had not been removed.

The cause of this event were multiple personnel errors and the same programmatic weaknesses identified for AR Sticker #1.

AR Sticker #5

On November 30, 1995, AR A0387622, "FCV-530 Position Indication," was initiated to investigate a problem associated with the Unit 1 control room position indication on Flow Control Valve (FCV)-530. An AR sticker was placed on the Unit 1 Main Control Console CC-3 at Hand Controller HC-530 to identify a problem with the FCV-530 in accordance with IDAPs OM7.ID1 and OP2.ID2.

On November 30, 1995, the work associated with the position indicator for FCV-530 was completed

On April 21, 1996, AR A0387622 was taken to the completed status. The associated AR sticker was not removed in accordance with IDAPs OM7.ID1 and OP2.ID2.

On May 15, 1996, the NRC resident inspectors performed a walkdown of the Unit 1 main control board and identified that the AR sticker for AR A0387622 had not been removed.

The causes of this event are unknown at this time, but are presumed to be similar to those identified for AR Sticker #1.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The Technical Maintenance section has performed an audit of both Units 1 and 2 control boards to ensure that all AR stickers that should be removed, have been removed.

CORRECTIVE ACTIONS TO BE TAKEN TO PREVENT RECURRENCE

1. PIMS has been re-programmed to require that personnel sign-off on the AR tag removal block prior to taking the AR to the completed status. This action will ensure that personnel have verified that the AR sticker has been removed after the work is completed.

2. The roles and responsibilities of personnel involved in the AR sticker removal process will be clarified in DCPP IDAPs OM7.ID1 and OP2.ID2.

3. PG&E will establish expectations with Maintenance and Engineering personnel regarding the timely removal of AR stickers personnel. In addition, AR sticker removal will continue to receive management attention. If AR stickers are not removed in a timely manner, PG&E management will oversee a policy of accountability and positive discipline

to remind and ensure that individuals comply with AR sticker removal procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance. Expectations for AR sticker removal will be established by October 1, 1996. The procedure revisions will be completed by December 31, 1996.