

# CATEGORY 1

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       50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga      05000323  
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SUBJECT: Responds to NRC 960930 ltr re violations noted in insp rept  
 50-275/96-13 & 50-323/96-13. Specific CA's to prevent  
 recurrence have been completed through removal of  
 combustible material.

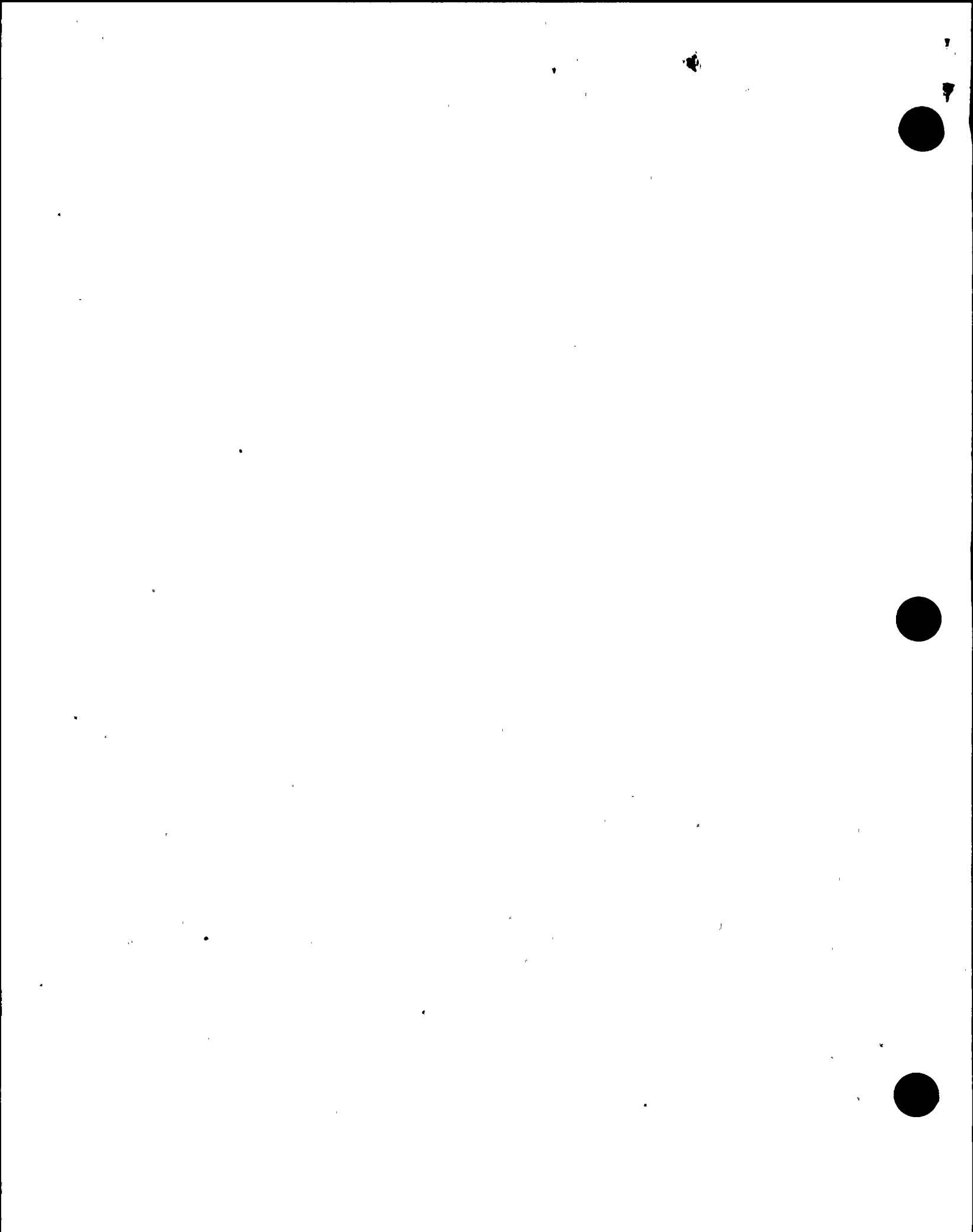
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September 30, 1996



PG&E Letter DCL-96-202

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Reply to a Notice of Violation in Inspection Report Nos. 50-275/96-13 and 50-323/96-13

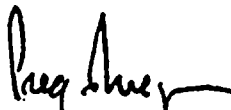
Dear Commissioners and Staff:

NRC Inspection Report (IR) Nos. 50-275/96-13 and 50-323/96-13, dated August 16, 1996, included a Severity Level IV violation regarding failure to control combustible materials in accordance with plant procedures.

PG&E received this IR on August 30, 1996, and requested an extension of the submittal due date to September 30, 1996. Mr. F. R. Huey, Branch Chief, U.S. Nuclear Regulatory Commission, Region IV, concurred with this request.

PG&E's reply to the notice of violation is enclosed.

Sincerely,

  
Gregory M. Rueger

cc: Steven D. Bloom  
L. J. Callan  
Kenneth E. Perkins  
Michael D. Tschiltz  
Diablo Distribution  
INPO

Enclosure

N0001997/DDM/2237

9610080110 960930  
PDR ADOCK 05000275  
Q PDR

JE 01/1



**REPLY TO A NOTICE OF VIOLATION  
INSPECTION REPORT NOS. 50-275/96-13 AND 50-323/96-13**

On August 16, 1996, as part of NRC Inspection Report (IR) Nos. 50-275/96-13 and 50-323/96-13, NRC Region IV issued a notice of violation to Diablo Canyon Power Plant, Units 1 and 2. The statement of violation and PG&E's reply are documented below.

**STATEMENT OF VIOLATION**

*Technical Specification 6.8.1.h requires that written procedures be established, implemented and maintained to implement the Fire Protection Program.*

*Licensee Procedure OM8.ID4, "Control of Combustible Materials," Revision 3, dated December 21, 1995, paragraph 5.8.1 required that all combustible materials stored in the auxiliary building, and not in a designated storage area, receive a transient combustible permit.*

*Contrary to the above, on June 6, 1996, the inspectors identified approximately 300 feet of 3-inch diameter rubber hose stored in the containment penetration area of Unit 2. Specifically, the hose was found at the 100-foot elevation in the auxiliary building with no transient combustible permit.*

*This is a Severity Level IV violation (Supplement 1)(323/96013-01).*

**REASON FOR THE VIOLATION**

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

In 1988, PG&E installed piping, dedicated hose connections, and storage hangers for approximately 300 feet of 3-inch flexible hose to perform steam generator (SG) rapid fill and drain down during refueling outages. The design change was not identified to require an impact review by fire protection personnel for changes to the Fire Protection Program combustible loading calculations.

During 1988, PG&E performed a baseline fire protection area walkdown to identify and quantify insitu and transient combustible material. Based upon a review of available documentation, it appears that the inventory walkdown was conducted at approximately the same time as the SG rapid fill and drain down design change implementation.



PG&E believes that the fire area walkdown was performed prior to the installation of the flexible hose, or if installed, that walkdown personnel assumed the hose would be removed upon completion of the refueling outage. Therefore, the 1988 baseline combustible material inventory did not identify the 300 feet of hose to be included in the engineering Fire Loading Calculation M-824.

In conclusion, PG&E believes the violation was caused by inadequate fire protection guidance in the 1988 engineering design change procedure.

### **CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED**

The design change control procedures have been revised since the implementation of the SG rapid fill and drain system in 1988 as part of ongoing enhancements made to PG&E's design change process. A review of the current design change procedures, CF3.ID9, "Design Change Package Development," and CF3.ID10, "Maintenance Modification Action Requests," verified adequate requirements to involve fire protection design personnel and update of the fire loading calculations when insitu combustible loading changes occur. Procedure CF3.ID13, "Replacement or New Part Evaluation (RPE)," will be enhanced to include reference to CF3.ID9 to ensure a review by the fire protection group.

As noted in the IR, a plant walkdown of fire areas governed by OM8.ID4 identified additional combustible materials previously considered to be insitu that were not included in the Fire Loading Calculation M-824. Plant fire protection personnel notified the area owners to promptly remove the material or request a transient combustible permit pending further resolution.

Compensatory (roving) firewatches are currently in place and will be maintained pending completion of the Fire Protection Program evaluations and modifications (Ref. Licensee Event Reports 94-001, 95-003, and 96-011). These firewatches provide additional fire protection of plant safe shutdown areas by local observation for smoke or detecting fires in their incipient stages.

### **CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS**

The specific corrective actions to prevent recurrence have been completed through the removal of combustible material, or issuance of a transient combustible permit described above. Additional actions to be implemented to support the control of combustibles program include:

1. Procedure OM8.ID4 will be revised to require periodic combustible material walkdowns by plant fire protection personnel and documentation of results.





2. An assessment to identify any additional insitu combustibile in areas governed by procedure OM8.ID4 will be performed. These insitu combustibile materials will be included in a revision of Fire Loading Calculation M-824. Permits have been issued to identify this material as transient combustibile, pending the completion of this assessment.
3. Procedure CF3.ID13, "Replacement or New Part Evaluation (RPE)," will be enhanced to include reference to CF3.ID9 to ensure a review by the fire protection group.

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

PG&E is currently in full compliance with the Fire Protection Program requirements. Revision of procedures, combustibile material walkdowns, and revision of the Fire Loading Calculation M-824 for Units 1 and 2, will be completed prior to the next regularly scheduled refueling outage currently scheduled to begin April 19, 1997. The compensatory (roving) firewatches will be maintained until the corrective actions taken to prevent recurrence have been completed.

