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SUBJECT: Provides response to request for addl info contained in NRC
ltr,dtd 970311 re review of procedure commitment database
for Insp Repts 50-275/96-21 & 50-323/96-21.

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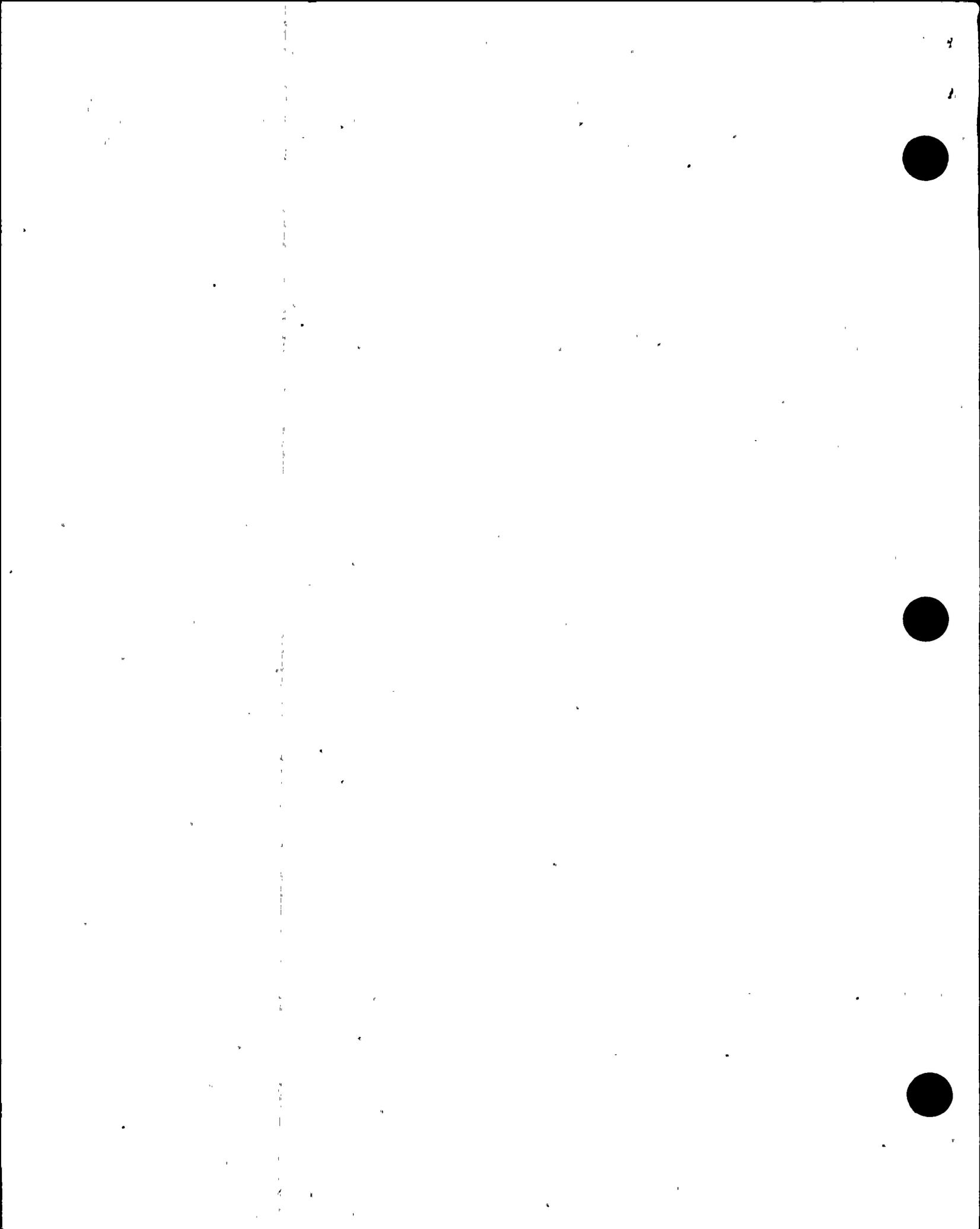
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May 30, 1997

PG&E Letter DCL-97-103

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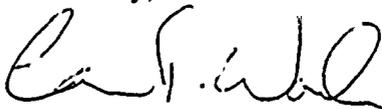
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Reply to Request for Additional Information Regarding Review of the Procedure
Commitment Database (Inspection Report Nos. 50-275/96-21; 50-323/96-21)

Dear Commissioners and Staff:

This letter provides PG&E's response to a request for additional information contained in an NRC letter, dated March 11, 1997. The NRC staff requested additional information regarding the review of the procedure commitment database described in PG&E's response to a Notice of Violation, submitted on February 10, 1997 (PG&E Letter DCL-97-015).

The requested additional information is enclosed.

Sincerely,



Lawrence F. Womack

c: Steven D. Bloom
Ellis W. Merschoff
Kenneth E. Perkins
Michael D. Tschiltz
Diablo Distribution

Enclosure

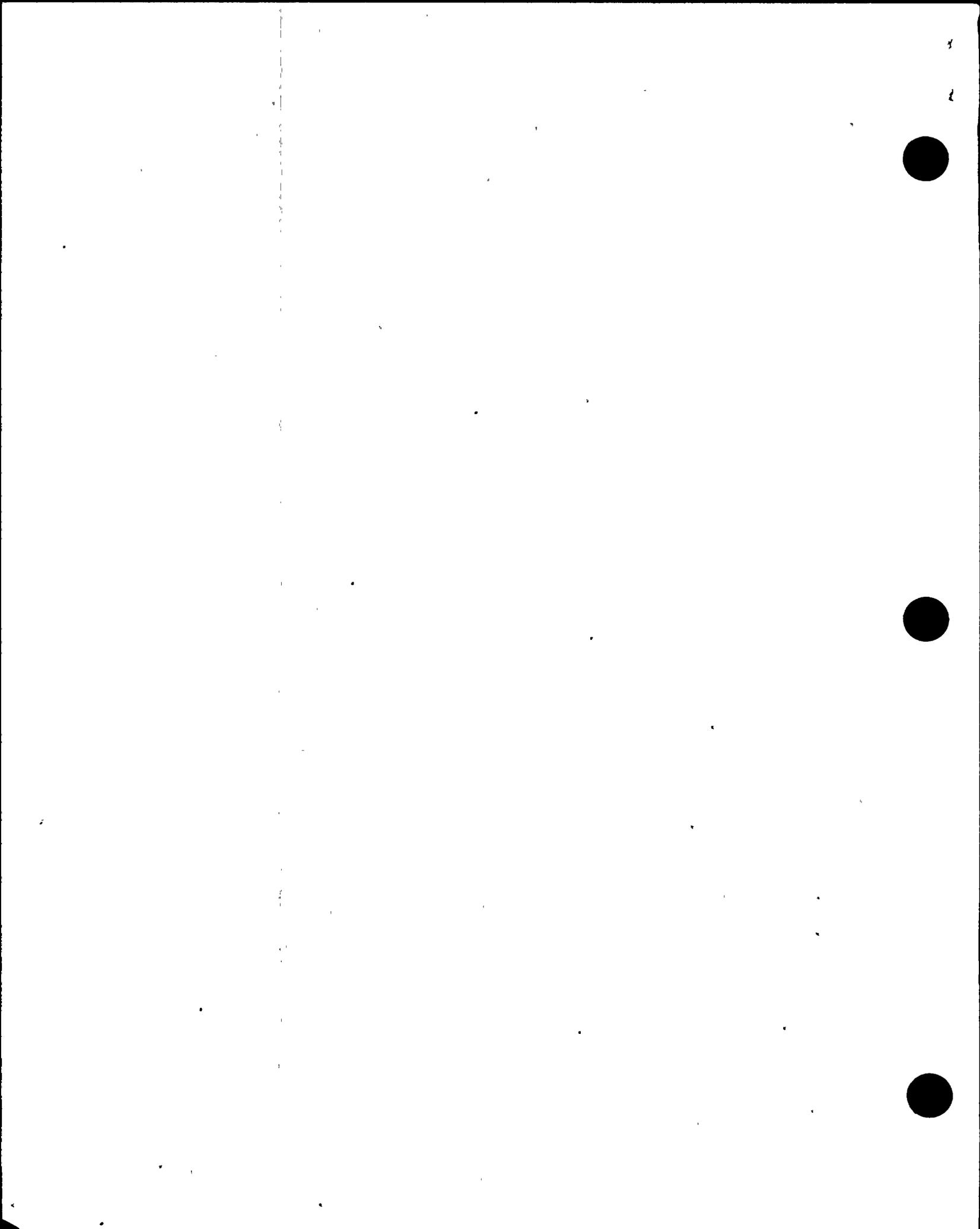
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**PG&E Reply to NRC Request for Additional Information, dated March 11, 1997,
Regarding Review of the Procedure Commitment Database
(Inspection Report Nos. 50-275/96-21; 50-323/96-21)**

Background

By letter dated February 10, 1997 (PG&E Letter DCL-97-015), PG&E responded to NRC Notice of Violation, dated January 9, 1997. In the February 10 letter, PG&E stated, "All removed procedure commitment database (PCD) entries will be reviewed by April 30, 1997."

By letter dated March 11, 1997, the NRC staff requested additional information resulting from its review of PG&E's letter of February 10, 1997. The NRC letter documented a request for additional information regarding review of PG&E's PCD and requested a response within 30 days after completion of the review. PG&E completed the review on April 30, 1997.

NRC Request for Additional Information

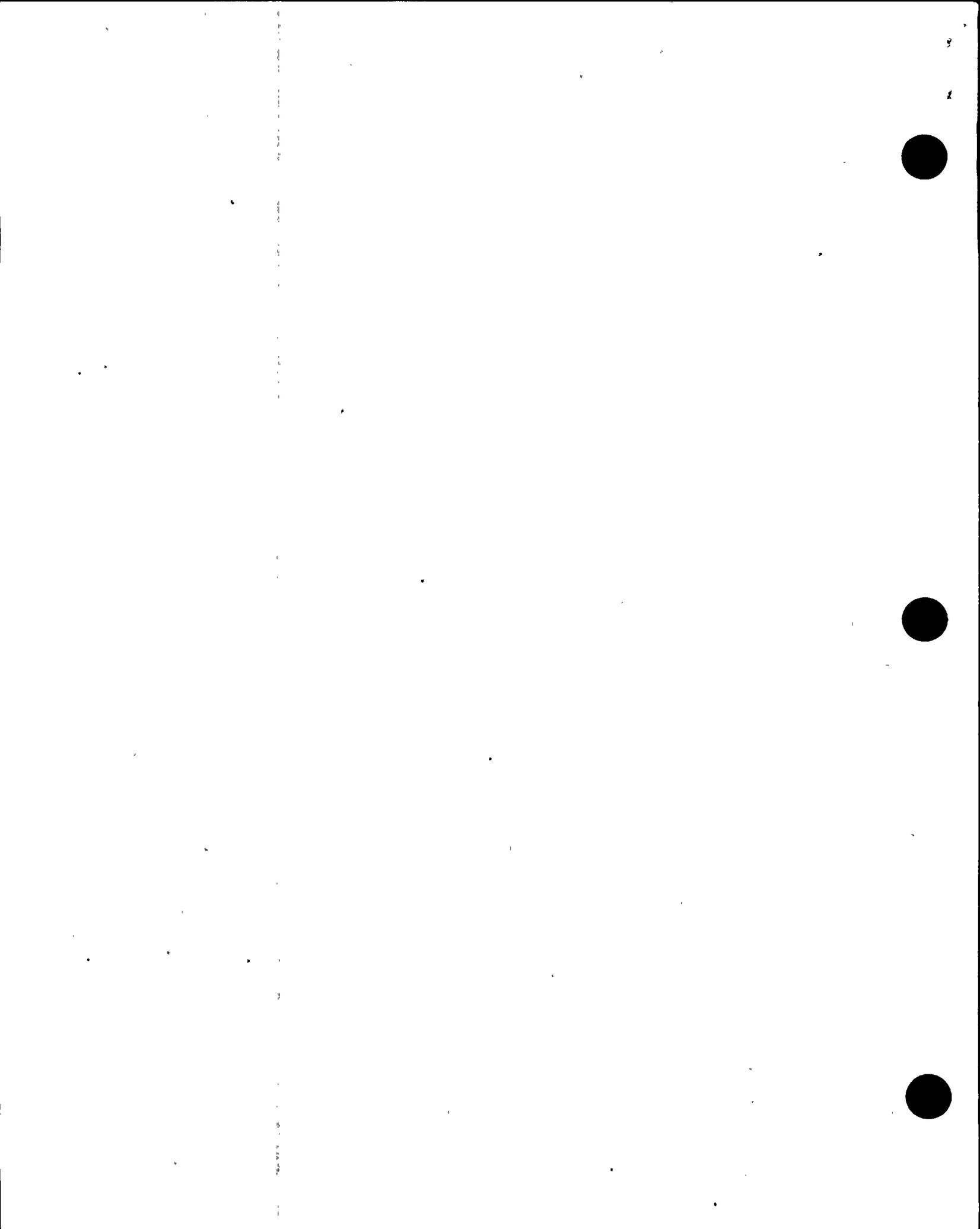
"We are interested in obtaining additional details related to the review of the procedure commitment database. Specifically, we request that you provide a written response within 30 days after completion of the database review describing: (1) the scope of the procedure database review; (2) the number and characterization of the deficiencies found; and (3) the actions taken to maintain the database current and accurate."

PG&E Response

(1) Scope of the Procedure Database Review

After the PCD was developed, many of the commitment data records in the database were considered to contain descriptive information that did not constitute a commitment. The resulting volume of data made the database cumbersome and inefficient to use. As a result, PG&E initiated a PCD reduction effort during the 1989 to 1991 time period to reduce the number of commitments in the system using criteria developed at that time. Commitment data records that were determined to not constitute a commitment were coded as "delete" but remained as permanent records in the PCD. These records have always been searchable, but not as active records.

In November 1996, a discrepancy was discovered between Emergency Operating Procedure (EOP) E-1.3, "Transfer to Cold Leg Recirculation," and requirements contained in the FSAR Update. The PCD was considered to be a barrier that could have prevented this discrepancy had the specific FSAR Update commitment associated with EOP E-1.3 remained active, or in "approve"



status, in the database. As an immediate corrective action, PG&E reviewed all deleted FSAR Update commitment records in the PCD to determine if other FSAR Update commitments had been inappropriately deleted. A total of 4,300 FSAR Update commitments were reviewed.

The review was performed using revised criteria developed by PG&E, which have since been proceduralized, as a standard for determining if a commitment in the PCD should be reinstated. The criteria for reinstatement of a commitment are as follows:

- Procedures described or directly referred to in the FSAR Update
- Action requirements or descriptions of specific actions
- Time restrictions or limitations
- Time-dependent analysis assumptions
- Description of plant equipment that would be used to define operability criteria
- Design requirements with implied system operability or testing

Similarly, criteria for maintaining a commitment in "delete" status in the PCD were also established. The criteria are as follows:

- General plant design description
- One-time action statement
- Action already governed by plant Technical Specifications or by the Inservice Testing Program
- Plant organization governed by plant Technical Specifications
- General statements regarding testing programs or surveillances
- No longer in the FSAR Update

(2) Number and Characterization of the Deficiencies Found

PG&E completed its review of all deleted FSAR Update commitments on April 30, 1997. The results of that review reflect that 238 (less than 6 percent) of the previously deleted FSAR Update commitments were recommended for reinstatement back into the PCD. None of the commitments which have been recommended for reinstatement were considered to be safety significant. This relatively low number indicates that the original review performed during the 1989 to 1991 PCD reduction effort was generally adequate and the criteria used at that time were consistent with the criteria currently proceduralized. In recent years, with increased management focus and industry initiatives directed toward commitment management, the criteria for what constitutes a commitment in the PCD have become more stringent. Thus, the number of commitments determined to be reinstated in the PCD in our view reflect these improvements in commitment management control.

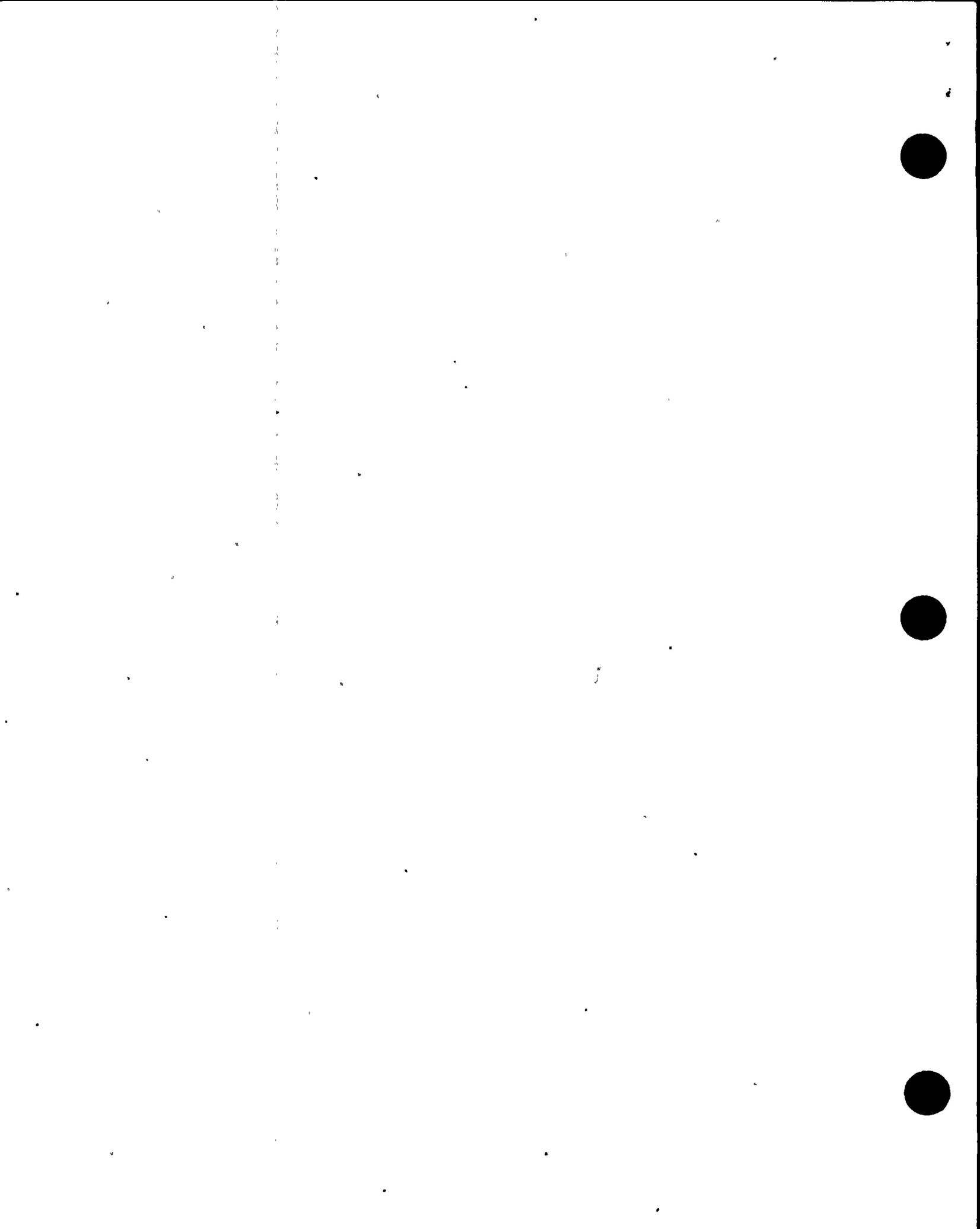


A listing of the review of the deleted FSAR Update commitments by procedure discipline is provided in Table 1. Currently, PG&E is reviewing those commitments which have been recommended for reinstatement against plant procedures to determine past compliance with the FSAR Update.

For those commitments that were determined to have been appropriately deleted from the PCD, the four main criteria that were used to reach this conclusion were: (1) there was an existing commitment data record that superseded the deleted record, (2) the commitment was no longer a statement or requirement in the current revision of the FSAR Update, (3) the commitment was determined to be too general in nature to require an administrative program to ensure its implementation, and (4) the commitment was determined to be a general description of plant design.

Table 1

Procedure Discipline	Commitments Reviewed	Recommended for Reinstatement	Characterization of Deficiencies Found
Operations	372	73	Commitments requiring operator action, procedures directly referenced in the FSAR Update, and time-dependent analysis assumptions.
Chemistry and Environmental	101	26	Statements requiring specific action be taken or time-dependent analysis assumptions.
Maintenance	347	12	Statements requiring specific action be taken or time-dependent analysis assumptions.
Engineering	586	82	Statements requiring specific action be taken or time-dependent analysis assumptions.
Administrative	2,894	45	Commitments requiring administrative controls to ensure continued implementation.



(3) Actions Taken to Maintain the Database Current and Accurate

As previously stated, PG&E has proceduralized the criteria used to identify PCD commitments in the FSAR Update. Additionally, as stated in PG&E Letter DCL-97-015, dated February 10, 1997, a technical review group has been formed to review the 10 CFR 50.59 safety evaluation process and make recommendations for process improvement. The recommendations include: (1) A review of the FSAR Update by discipline to identify all detailed FSAR Update guidance and any discrepancies between the FSAR Update and plant procedures. Any discrepancies identified will be resolved through the problem identification and resolution process; (2) Evaluate how the PCD can be improved as a tool for use by NPG personnel when performing licensing basis impact evaluations; and (3) Evaluate whether the remaining non-FSAR Update deleted commitments in the PCD should be reviewed to ensure that no other licensing basis commitments have been inadvertently deleted.



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