



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

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ARLINGTON, TEXAS 76011-8064

SEP 24 1997

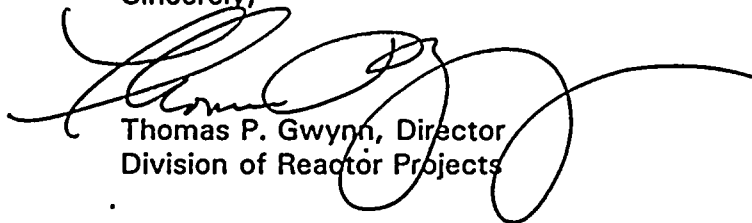
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and General Manager
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San Francisco, California 94177

SUBJECT: NRC INSPECTION REPORT 50-275/97-10; 50-323/97-10

Dear Mr. Rueger:

Thank you for your letter of September 8, 1997, in response to our letter and Notice of Violation dated August 8, 1997. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,



Thomas P. Gwynn, Director
Division of Reactor Projects

Docket Nos.: 50-275
50-323
License Nos.: DPR-80
DPR-82

cc:
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SEP 24 1997

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Senior Project Inspector (DRP/E, WCFO)
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9/23/97		9/19/97		9/24/97					

*previously concurred

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Branch Chief (DRP/TSS)
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*previously concurred

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RE: 50-275/97-10

97 SEP 18 PM 1:05

September 8, 1997

PG&E Letter DCL-97-153

U.S. Nuclear Regulatory Commission
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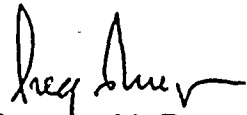
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Reply to a Notice of Violation in Inspection Report Nos. 50-275/97-10 and 50-323/97-10

Dear Commissioners and Staff:

NRC Inspection Report Nos. 50-275/97-10 and 50-323/97-10, dated August 8, 1997, included two Severity Level IV violations. The two violations are: (1) failure to follow applicable procedures for realigning a vital power source to an instrument panel and (2) a missed surveillance requirement to demonstrate containment integrity by periodically verifying a manual valve was secured in the closed position.

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

Sincerely,


Gregory M. Rueger

cc: Donald B. Allen
Steven D. Bloom
Ellis W. Merschoff
Kenneth E. Perkins
Diablo Distribution
INPO

Enclosure

TLH/2237/A0440311

9709120243-520

**REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-275/97-10 AND 50-323/97-10**

On August 8, 1997, as part of NRC Inspection Report (IR) Nos. 50-275/97-10 and 50-323/97-10, NRC Region IV issued two notices of violation to Diablo Canyon Power Plant, Units 1 and 2. The statements of violation and PG&E's reply are documented below.

STATEMENT OF VIOLATION A

- A. *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 appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.*

Operating Procedure OP J-10:IV, "Instrument AC System - Transfer of Panel Power Supply," Section 6.21, specifies the procedure to be followed for the transfer of instrument AC Panel PY-16 from its backup power supply to its normal power supply. Section 6.21 requires that the backup power supply Breaker 52-1F-27 be open and the use of a transfer switch change form per Procedure OP1.DC20, "Sealed Components."

Contrary to the above, following transfer of PY-16 back to its normal power supply during Refueling Outage 1R8, the backup power supply breaker remained closed. Additionally, a change form had not been used, as required, when removing the seal installed when the transfer switch had been aligned to the backup power supply and when installing the seal following realignment of the power transfer switch to the normal power supply.

This is a Severity Level IV violation (Supplement I) (50-275/97010-01).

REASON FOR THE VIOLATION A

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

PG&E was unable to determine the specific cause of the violation. However, an investigation determined the following concerning failure to use a Transfer Switch Change Form and the mispositioned breaker.

The investigation determined that a Transfer Switch Change Form had been used to remove the seal from AC Transfer Switch EY-16 when the normal power supply was removed from service. Although the transfer switch was found in the

proper position and sealed, the form was apparently not used when normal power was restored.

PG&E was unable to determine why the breaker was mispositioned since the Transfer Switch Change Form was not completely filled out. The investigation concluded that a personnel error had probably occurred. Either Operating Procedure OP J-10:IV was not used or the procedure steps were missed when returning the power supply breakers for instrument AC Panel PY-16 to normal alignment.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A walk down of the switches and breakers listed in the attachment to Operating Procedure (OP) K-10X27, "Transfer Switch Procedure," was completed to verify proper alignment. No other discrepancies were identified.

CORRECTIVE ACTIONS TO BE TAKEN TO PREVENT RECURRENCE

Recurring tasks for Units 1 and 2 were developed to verify the correct power supply breaker alignment for the transfer switches using OP K-10X27. These tasks will be completed within 30 days following Mode 4 (Hot Shutdown) entry after refueling outages.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance.

STATEMENT OF VIOLATION B

- B. *Technical Specification 4.6.1.1.a, states, in part, containment integrity shall be demonstrated at least once per 31 days by verifying that all penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions.*

The Technical Specification 4.6.1.1.a surveillance requirement was implemented by STP I-1 D, "Routine Monthly Checks Required By Licenses", Revision 48.

Contrary to the above, on July 9, 1997, instrument isolation Valves SI-1 (2)-8964 for 1 (2)PI-942, required to be closed to maintain containment integrity, were not listed in STP I-1 D, "Routine Monthly Checks Required By Licenses," Revision 48, and had not been verified closed on a 31-day frequency.

This is a Severity Level IV violation (Supplement I) (50-275;323/97010-02).

REASON FOR THE VIOLATION B

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

The violation was caused by a misinterpretation of containment isolation valve (CIV) surveillance requirement applicability to certain manual test, vent, and instrument isolation valves. PG&E believed the requirements applied only to test, vent, and drain valves and instrumentation valves used in local leak rate testing that might form part of the containment penetration boundary between Type C tested CIVs.

Refer to Licensee Event Report (LER) 1-97-013 for additional information regarding the causes and corrective actions for this notice of violation.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The subject valves on both Units were verified closed by Operations Department personnel. PG&E verified that SI-1(2)-8964 were not included in the appropriate surveillance test procedure (STP).



CORRECTIVE ACTIONS TO BE TAKEN TO PREVENT RECURRENCE

As stated in LER 1-97-013, two of the three STPs were revised as of August 25, 1997.

STP V-6, "Verification of Proper Alignment of Penetration Test Connection Valves, Spare Instrument Lines and Equipment Hatch For Containment Integrity," will be revised before the next refueling outage.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance. The STP V-6 procedure revisions will be completed before the next refueling outage (Unit 2 eighth refueling outage, currently scheduled to begin in February 1998).

