

ENCLOSURE 1

NOTICE OF VIOLATION

Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant

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

During an NRC inspection conducted on February 15 through March 28, 1998, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed by procedures appropriate to the circumstances.

Contrary to the above, as of March 10, 1998, Procedure OP A:2-III, "Reactor Vessel - Draining to Half Loop/Half Loop Operations with Fuel in the Vessel," Revision 13, was not appropriate to the circumstances. Specifically, Procedure OP A:2-III did not provide for verification that seismic concerns were eliminated prior to entry into a reduced inventory condition. As a consequence, the nonseismically qualified hoist and trolley for residual heat removal Pump 2-2 was not in its approved storage position and the chains were not in the storage racks when residual heat removal Pump 2-2 was being used for decay heat removal during a reduced inventory condition.

This is a Severity Level IV violation (Supplement I) (50-323/98007-02).

- B. Technical Specification 6.8.1 states, in part, that procedures shall be established and implemented for the procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 2.1, recommends a procedure for refueling and core alterations.

Procedure OP B-8DS2, "Core Loading Sequence," Revision 20, partially implemented this requirement and stated in Step 6.10 that "once source range detectors have been 'bugged,' block the High Flux at Shutdown Alarm. This alarm must be unblocked after each source assembly is moved into its final location. (The alarm should clear at that time.)" Step 21B of Attachment 9.8 to OP B-8DS2, "Fuel Movement Tracking Sheet" stated, in part, "Restore N-32 High Flux at Shutdown Alarm."

Contrary to the above, on March 5, 1998, Procedure OP B-8DS2 was not properly implemented in that the High Flux at Shutdown alarm for source range Channel N-32 was not unblocked or restored when the source assembly was moved to its final location near source range Detector N-32, as specified in Step 21B of the "Fuel Movement Tracking Sheet."

This is a Severity Level IV violation (Supplement I) (50-323/98007-03).



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- A. 10 CFR Part 50, Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed by procedures appropriate to the circumstances.

Contrary to the above, as of March 10, 1998, Procedure OP A:2-III, "Reactor Vessel - Draining to Half Loop/Half Loop Operations with Fuel in the Vessel," Revision 13, was not appropriate to the circumstances. Specifically, Procedure OP A:2-III did not provide for verification that seismic concerns were eliminated prior to entry into a reduced inventory condition. As a consequence, the nonseismically qualified hoist and trolley for residual heat removal Pump 2-2 was not in its approved storage position and the chains were not in the storage racks when residual heat removal Pump 2-2 was being used for decay heat removal during a reduced inventory condition.

This is a Severity Level IV violation (Supplement I) (50-323/98007-02).

- B. Technical Specification 6.8.1 states, in part, that procedures shall be established and implemented for the procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 2.1, recommends a procedure for refueling and core alterations.

Procedure OP B-8DS2, "Core Loading Sequence," Revision 20, partially implemented this requirement and stated in Step 6.10 that "once source range detectors have been 'bugged,' block the High Flux at Shutdown Alarm. This alarm must be unblocked after each source assembly is moved into its final location. (The alarm should clear at that time.)" Step 21B of Attachment 9.8 to OP B-8DS2, "Fuel Movement Tracking Sheet" stated, in part, "Restore N-32 High Flux at Shutdown Alarm."

Contrary to the above, on March 5, 1998, Procedure OP B-8DS2 was not properly implemented in that the High Flux at Shutdown alarm for source range Channel N-32 was not unblocked or restored when the source assembly was moved to its final location near source range Detector N-32, as specified in Step 21B of the "Fuel Movement Tracking Sheet."

This is a Severity Level IV violation (Supplement I) (50-323/98007-03).



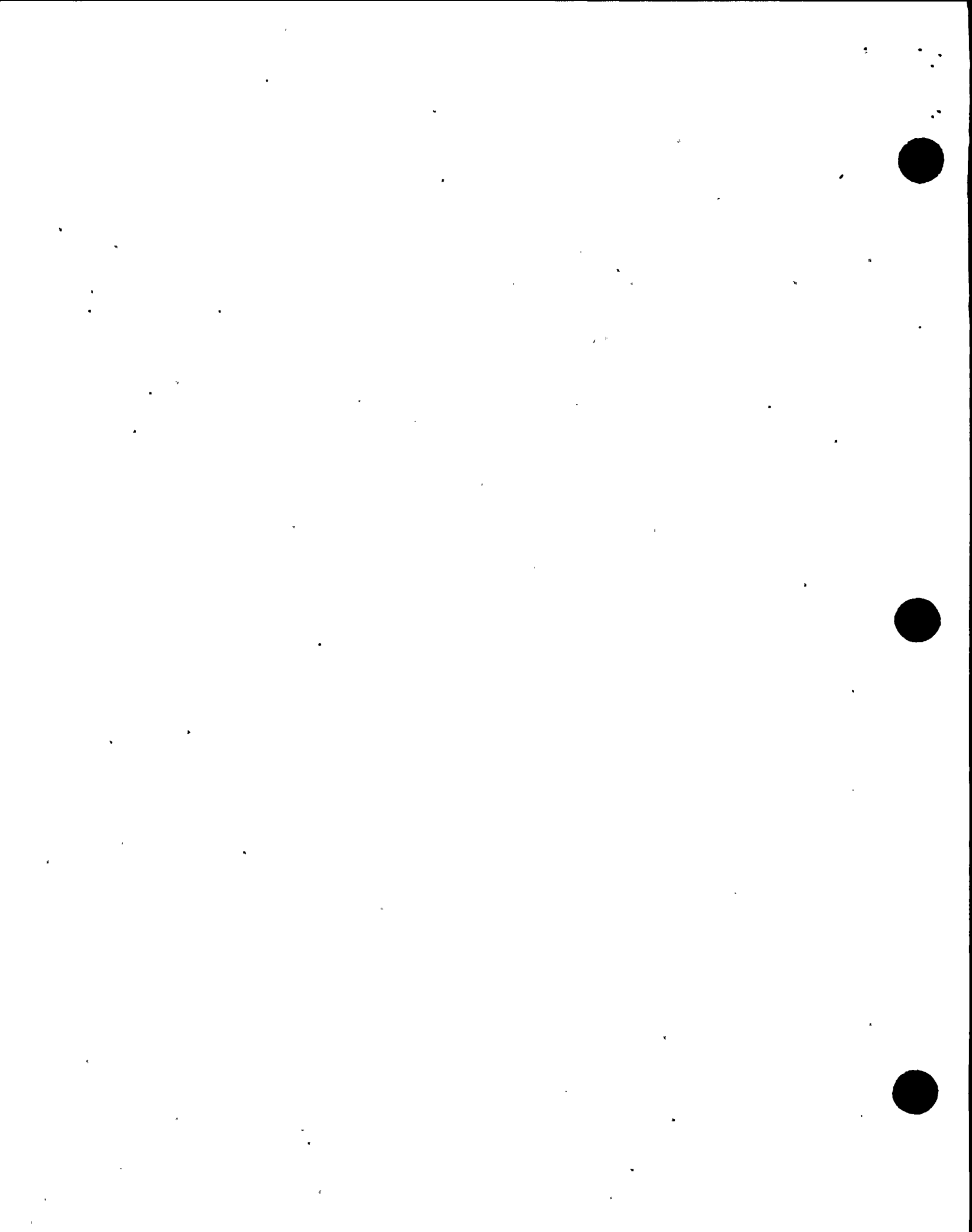
- C. Technical Specification 6.8.1 states, in part, that procedures shall be implemented for the procedures recommended in Regulatory Guide 1.33, Appendix A. Regulatory Guide 1.33, Appendix A, Section 1.c, recommends a procedure for equipment control (e.g., locking and tagging).

Procedure OP2.ID1 "Clearances and Administrative Tag-outs," Revision 9, partially implemented the requirement for a tagging procedure and stated the clearance process establishes and controls a safe working boundary within which work may be safely performed on plant equipment. Prior to removing equipment from service, the impact on existing plant conditions is evaluated. Procedure OP2.ID2, "DCPP Tagging Requirements," Revision 6, stated plant operators are responsible for ensuring that tags are hung on and removed from correct clearance points.

Contrary to the above, from February through March, 1998, multiple failures to implement tagging procedures occurred. Specifically:

1. On February 25-26, 1998, while attempting to remove clearance tags to allow testing, operators mistakenly removed tags from incorrect clearance points. In the first instance, an operator mistakenly removed a tag from the wrong breaker. In the second instance, operators were directed to remove tags and close two breakers that were incorrectly identified on a report-off-for-test document.
2. On February 17, 1998, a clearance was hung prior to the proper plant conditions being established, isolating reactor coolant pump seal injection while the reactor coolant system pressure was approximately 350 psig. Operating Procedure OP A-6:II, "Reactor Coolant Pumps - Shutdown and Clearing," Precautions and Limitations 5.2, specified that seal injection should remain in service as long as the reactor coolant system is pressurized to prevent introduction of crud from the reactor coolant system into the seals.
3. On March 3, 1998, workers detected voltage on a cathodic protection circuit prior to performing work. The clearance did not remove an alternate source of power from Unit 1's power supply.
4. On March 4, 1998, while removing tags following work, an operator discovered a caution tag hanging over the fuse holders for removed fuses for Valve RCS-2-PCV-474. This tag should have been on the fuse holders for fuses for Valve RCS-2-PCV-472.
5. On March 17, 1998, after testing a control rod drive mechanism fan for proper direction of rotation, technical maintenance swapped the leads without clearing the breaker.

This is a Severity Level IV violation (Supplement I) (50-275;323/98007-04).



- D. 10 CFR Part 50, Appendix B, Criterion III, states, in part, that measures shall be established to assure that the design basis of structures, systems, and components is correctly translated into procedures.

Contrary to the above, as of January 23, 1998, the design basis of the reactor vessel refueling level indication system was not properly translated into procedures. Specifically, Drawing 6010906-1 stated that tubing associated with the reactor vessel refueling level indication system was rated for a burst pressure of 150 psig, but Procedure OP AP SD-5, "Loss of, or Inadequate Decay Heat Removal," Appendix D, Revision 6, directed primary pressure to be increased to up to 400 psig, in excess of the system design pressure.

This is a Severity Level IV violation (Supplement I) (50-275:323/98007-05).

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will



create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Walnut Creek, California,
this 22 day of April 1998

