

APPENDIX A

NOTICE OF VIOLATION

Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant

Docket: 50-323
License: DPR-82

During an NRC inspection conducted on October 19-28, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. Diablo Canyon Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, recommends procedures covering the performance of surveillance tests on emergency power systems.

1. Procedure STP M-96, Revision 18, "Diesel Generator 24-Hour Load Test," Step 12.3.1.e.4, states, in part, that "The following equipment will not autostart in this test and must be shut down:
a) residual heat removal (RHR) Pump 2 . . ."

Contrary to this requirement, on October 18, 1994, Step 12.3.1.e.4 was performed without having shut down RHR Pump 2.

2. Procedure STP M-96, Revision 18, "Diesel Generator 24-Hour Load Test," Step 12.3.2.g.1, states "Review equipment which will be lost due to the transfer and verify the loss will not place the plant in a Tech Spec action statement."

Contrary to this requirement, on October 18, 1994, Step 12.3.2.g.1 was performed without noting that RHR Pump 2-2 would be lost during the transfer. Securing power to Bus H resulted in the loss of operating RHR Pump 2-2. The loss of RHR Pump 2-2 resulted in placing the plant in Technical Specification 3.4.1.4.1 action statement.

This is a Severity Level IV violation (Supplement 1 applicable to Unit 2).

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, (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. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause 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.

Dated at Arlington, Texas,
this *9th* day of *November* 1994 -

