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August 3, 1995



PG&E Letter DCL-95-162

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Reply to Notice of Violation in NRC Inspection Report Nos. 50-275/95-09 and 50-323/95-09

Gentlemen:

NRC Inspection Report Nos. 50-275/95-09 and 50-323/95-09, dated July 7, 1995, contained a Notice of Violation that cited one Severity Level IV violation regarding a failure to ensure that all members of the fire brigade participated in at least two fire drills in 1994.

PG&E's response to the Notice of Violation is attached as Enclosure 1. Enclosure 2 provides a clarification of related concerns expressed in the inspection report.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Rueger'.

Gregory M. Rueger

cc: L. J. Callan  
Kenneth E. Perkins  
James C. Stone  
Michael D. Tschiltz  
Diablo Distribution

Enclosures

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ENCLOSURE 1

REPLY TO NOTICE OF VIOLATION IN  
NRC INSPECTION REPORT Nos. 50-275/95-09 AND 50-323/95-09

On July 7, 1995, as part of NRC Inspection Report Nos. 50-275/95-09 and 50-323/95-09, NRC Region IV issued a Notice of Violation citing one Severity Level IV violation for Diablo Canyon Power Plant, Units 1 and 2. The statement of violation and PG&E's response follow.

STATEMENT OF VIOLATION

During an NRC inspection conducted on June 12-16, 1995, 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:

Section (q) of 10 CFR Part 50.54 requires licensees to follow and maintain in effect emergency plans which meet the standards in 50.47(b).

Section b(14) of 10 CFR 50.47 requires, in part, that periodic drills to develop and maintain key skills related to emergency response capabilities will be conducted.

Section 8.1.1.4 of the Emergency Plan, Revision 3, Change 13, states, in part, that fire brigade team members are required to participate in at least two quarterly fire drills per year.

Contrary to the above, the licensee failed to conduct quarterly fire drills which ensured that all fire brigade team members participated in at least two quarterly drills during 1994.

This is a Severity Level IV Violation (Supplement VIII) 50-275/9509-02; 50-323/9509-02.



## REASON FOR THE VIOLATION

PG&E agrees that all fire brigade members did not attend two fire drills per year in 1994 as required by the DCPD Emergency Plan (EP) and that fire drills were not conducted for each fire brigade each quarter. This condition was identified in a Quality Assurance audit of fire brigade drill records for the 1994. Contributing to this event was a conflict in the number of drills required by the FSAR and EP for each brigade member. The FSAR states that each brigade member should participate in at least one drill per year, but the EP required each brigade member to participate in at least two drills per year.

The procedures implementing the two fire drills per member per year requirement and the quarterly fire drill for each fire brigade (AP B-51, "Industrial Safety and Fire Protection Training," and NPAP B-13, "Qualification and Training Requirements of Plant Personnel Specifically Concerned With Fire Loss Prevention,") were superseded August 18, 1994, with a new procedure, TQ1.DC12, "Fire Brigade Training." Personnel writing the new procedure and rescinding the old procedures considered the FSAR requirement for participation in one drill per year for fire brigade members, but did not consider the EP requirement for two drills per year per member.

The Emergency Plan was incorrectly checked as being not applicable on the procedure history sheet for TQ1.DC12. Procedure TS3.ID2, "Licensing Basis Impact Evaluations," Appendix 7.1, "Emergency Plan Pre-Screen," was unclear regarding applicability to fire brigade training and drills. An emergency plan effectiveness review should have been performed in accordance with 10 CFR 50.54(q) as part of the procedure revision. In December 1994, the EP was revised to agree with the FSAR and require each fire brigade member to participate in at least one drill per year.

Both the FSAR and the EP require fire drills to be performed each quarter. Interpretations of the FSAR and EP quarterly drill requirements made during the development of procedure TQ1.DC12, "Fire Brigade Training," were that the drills should be conducted quarterly but not necessarily for each fire brigade.

PG&E has subsequently determined that this interpretation was incorrect. A review of the DCPD licensing basis determined that PG&E committed in a letter to the NRC dated August 3, 1978, that the Diablo Canyon fire protection program would conform to the guidelines contained in "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance." These guidelines state that fire brigade drills should be performed at intervals not to exceed three months for each fire brigade. This guideline also states that one drill per year for each fire brigade should be at night and one drill per year for each fire brigade should be an unannounced drill. This commitment was not implemented by TQ1.DC12. Thus, from August 18 until December 1994, the EP fire brigade drill requirements did not agree with the requirements noted in its implementing procedure, TQ1.DC12, and the procedural



requirement for the number of fire drills required for each fire brigade did not agree with PG&E's commitment. As a result, although a total of 30 brigade fire drills were performed during 1994, there were 3 cases where a fire brigade did not receive a drill in a calendar quarter as required.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

PG&E performed an emergency plan effectiveness review in accordance with 10 CFR 50.54(q) and revised the EP in December 1994, to correspond with the drill participation requirements provided in the FSAR, which is that each fire brigade member shall participate in at least one drill per year.

#### CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

PG&E will revise TQ1.DC12, the FSAR, and the EP to require at least one drill per quarter for each fire brigade, one drill at night each year for each fire brigade, and one drill unannounced per year for each fire brigade.

PG&E will revise TS3.ID2, Appendix 7.1, "Emergency Plan Pre-Screen," to specifically include EP fire drills.

PG&E will add this event and guidance on the requirements of 10 CFR 50.54(q) to Technical Staff Update Training for presentation in the last quarter of 1995 or the first quarter of 1996.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance. Procedures TS3.ID2 and TQ1.DC12 and the Emergency Plan will be revised by November 30, 1995. The Technical Staff Training will be complete by March 31, 1996. The next scheduled FSAR revision will be issued by November 30, 1996.





ENCLOSURE 2

RESPONSE TO NRC CONCERNS IDENTIFIED IN NRC  
INSPECTION REPORT NOS. 50-275/95-09 AND 50-323/95-09

NRC Inspection Report 50-275/94-09 and 50-323/94-09 identified concerns regarding the effectiveness of corrective actions taken to prevent recurring problems with maintenance of fire brigade drill participation records. PG&E believes the actions described below are responsive to the NRC's concerns.

NRC CONCERN

A Quality Assurance (QA) audit of the fire brigade training requirements for the 1993 year stated that drill requirements were not met due to poor retention of drill participation records. The QA audit of the 1994 fire brigade drills noted that it appeared to have a repeat problem with retention of drill participation records. The NRC expressed a concern that the corrective actions for the 1994 audit of the 1993 drills was not effective; therefore, drills were missed in 1994. A second indication of weakness in these corrective actions was the fact that some evaluations (critiques) were found to be missing from the 1994 brigade drill records, indicating further weakness in maintaining drill records. The NRC did note that the records for the 1995 drills were complete.

PG&E RESPONSE

Corrective actions taken following the 1993 drill year audit included the establishment of a system to maintain the fire brigade training program files similar to that used for other operator training files. A review of the 1994 fire drill records showed that the drill participation records for 1994 were correct and had been properly retained. However, some critique forms were missing. The missing critique sheets had been inadvertently lost due to personnel errors; however, as noted by the NRC, the records for the 1995 drills were complete.

Inspection Report 95-09 also noted that some fire drills had not been performed in 1994. As discussed in Enclosure 1, interpretations of the FSAR and Emergency Plan (EP) quarterly drill requirements made during the development of procedure TQ1.DC12, "Fire Brigade Training," were that the drills should be conducted quarterly but not necessarily for each fire brigade. The interpretations were that drills should be conducted often enough to ensure that each member maintains his qualifications by participating in at least one drill per year; but there was no requirement for each of the



PG&E agrees that a more thorough response to the initial QA audit finding would have identified the misinterpretation that resulted in the missed 1994 drills. The actions described in Enclosure 1 should be effective in assuring that fire drills are conducted as required.

