

ENCLOSURE 2

AFFIDAVIT OF J. D. SHIFFER, J. M. GISCLON, K. C. DOSS, J. B. HOCH,  
R. C. THORNBERRY, AND R. K. RHODES

STATE OF CALIFORNIA )  
 ) ss.  
CITY AND COUNTY OF SAN )  
FRANCISCO )

The above being duly sworn, depose and say:

I, James D. Shiffer, am Manager of Nuclear Plant Operations in the Nuclear Power Generation Department of Pacific Gas and Electric Company.

I, John M. Gisclon, am Assistant Plant Manager for Diablo Canyon Power Plant.

I, Ken C. Doss, am a member of the Onsite Safety Review Group for the Diablo Canyon Power Plant and from September, 1977 to April, 1982 was a Senior Instrument and Controls Supervisor of the Instrument and Controls (I&C) Department for Diablo Canyon Power Plant.

I, John B. Hoch, am Project Manager for the Diablo Canyon Project.

I, Robert C. Thornberry, am the Plant Manager for Diablo Canyon Power Plant.

I, R. Keith Rhodes, am Technical Services Supervisor for the Diablo Canyon Project.

The purpose of this affidavit is to respond to certain allegations contained in the 10 CFR 2.206 petition of GAP dated February 2, 1984.



GAP #150, Petition at 44.

It is alleged that:

PG&E management's response to complaints about the absence of required documentation was to verbally reprimand those who requested corrective action. On April 3, 1979 12 PG&E technicians signed a letter formally requesting the necessary information to do their jobs properly. "Mr. Gisclon, the Technical Department Head, addressed the technicians the following day, saying 'I can't believe you people knew what you were signing', accusing us of 'rabble rousing', and basically telling us to keep quiet and follow orders". (citing Cooper Aff. at 25.)

1. When presented with the referenced letter, Mr. Gisclon promptly discussed the concerns with the people involved. He did not request that they "keep quiet and follow orders," but endeavored to get more specific information on their concerns. As a result of this meeting Mr. Gisclon took prompt action to make additional information available to the technicians to enable them to better perform their job. (See Affidavit, Shiffer, et al, 3/5/84, para. 45, p. 20.)

GAP #151, Petition at 44.

It is alleged that:

After a few months, PGandE management halted its corrective action program of routing current drawings and other reference materials to the technicians. "As a result, the technicians were forced to gather what information they could on their own. Informal drawings, vendor instruction manuals, catalogs, and notes from other plants were collected in informal files." (citing Cooper Aff. at 25-26.)



2. Contrary to the allegation, PGandE continued to provide drawings and other reference materials which were necessary for the technicians to perform their work. (See Affidavit, Shiffer, et al, 3/5/84, para. 45, p. 20.)

GAP #154, Petition at 46.

It is alleged that:

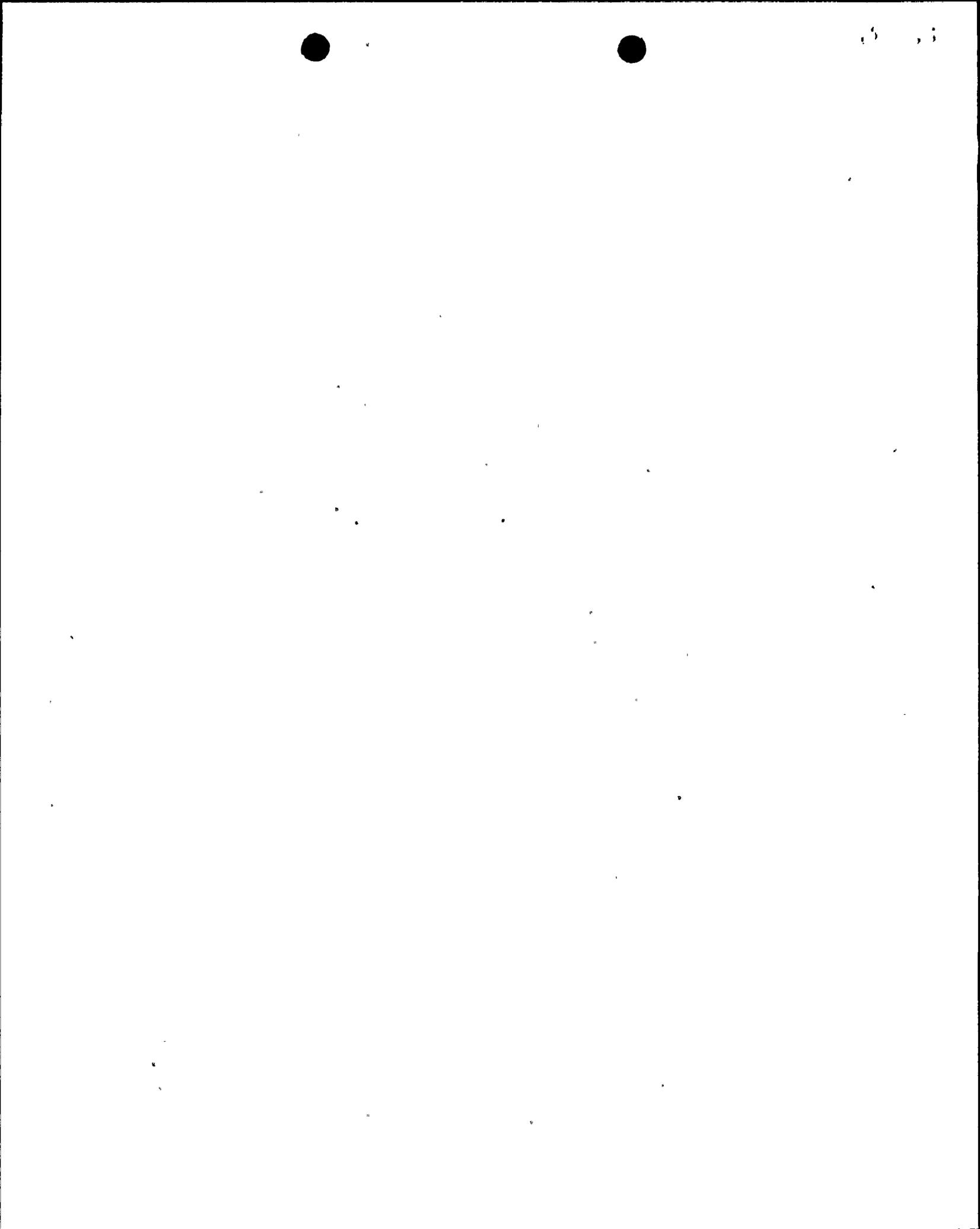
PGandE's -- and the NRC Staff's -- rationalization for the RHR vulnerability misrepresents the plant's circuitry. The spurious valve closures occur when the power is turned off in the Solid State Protection System (SSPS), through which the RHR signals pass. PGandE and the NRC have asserted that the RHR circuitry plays a role in the SSRS (sic) safety function, and therefore the circuits must be interconnected. That assertion has no basis in reality. The SSRS (sic) is totally unrelated to the RHR system, as can so easily be determined by a review of the circuit diagrams. (citing Cooper Aff. at 2, Exhibit 17, at 2.)

3. Contrary to the allegation, PGandE has not misrepresented the circuitry of the plant. PGandE has acknowledged that the closure signal passes through the SSPS. The circuitry functions in accordance with the design standards established by Westinghouse. (See Affidavit, Shiffer, et al, 3/5/84, para. 15, pp. 7-8.)

GAP #155, Petition at 44.

It is alleged that:

PG&E and again the NRC staff, also misrepresented the circuitry by claiming RHR protection through reliance on certain actuators in a "temperature pressure interlock system." Unfortunately, the plant technical specifications require that "the power be removed from the actuators for these valves during the period when the automatic closing action would be desired." (citing Cooper Aff. at 2.)



4. Contrary to the allegation, PGandE did not misrepresent the circuitry. Removal of power from the actuators was approved by the Staff when it approved the Technical Specifications and reaffirmed in SSER 21. (See Affidavit, Shiffer, et al, 3/5/84, para. 14, p. 7, para. 28, p. 13.)

GAP #157, Petition at 46.

It is alleged that:

PGandE's failure to notify the NRC of the RHR design defect represented a violation of 10 CFR 50.55(e) which requires such disclosure within 24 hours by the holder of a construction permit. NRC official Jesse Crews confirmed to Mr. Cooper that if the pumps had failed when needed during operations, the incident would be a significant event, a standard similar to section 50.55(e). Since PGandE had a construction permit in May 1981 when Mr. Cooper reported the flaw to management, the incident had to be reported immediately. (citing Cooper Aff. at 13, 17-18, Exhibit 17b at pp. 6-8.)

5. The RHR system installed at Diablo is a standard design which has received NRC review and approval. Contrary to the allegation, there is no design defect and no reporting requirement under 10 CFR 50.55(e). (See also Affidavit, Shiffer, et al, 3/5/84, para. 27-28, pp. 12-13.)

GAP #159, Petition at 47.

It is alleged that:

The corrective action imposed instead was ineffective: instead of rerouting the circuitry, the operators would have to leave the control room during the accident to manually operate the relevant valve breakers and protect the RHR pumps. This response violates the premises of the NRC's Safety Evaluation Report No. 7, on Diablo Canyon, which says that all actions necessary to cool down the plant during an accident could be accomplished from the control room. (citing Cooper Aff. at 10-11.)



The page is otherwise blank, with no visible text or markings.

6. At the time SSER 7 was written, there was no procedural requirement to remove power from valves 8701 and 8702. SSER 7 did acknowledge, however, that there could be instances which would require operator action outside of the control room. To the extent that any inconsistency did arise, it was accepted in SSER 8 and SSER 9 and when the Technical Specifications for removal of power from valves 8701 and 8702 were reviewed and approved by the NRC.

GAP #161, Petition at 47.

It is alleged that:

Management's corrective action for the RHR pump vulnerability -- manual response by the operators -- represented licensee action on an "unresolved (sic) safety question" without prior notice to and approval from the NRC. This unauthorized change violates 10 CFR 50.59. (citing Cooper Aff. at 16.)

7. The corrective action of removal of power to the valves was consistent with the Technical Specifications which the NRC had reviewed and approved. The action did not involve any "unreviewed safety question" and consequently did not constitute a violation of 10 CFR 50.59.

GAP #163, Petition at 48.

It is alleged that:

Mr. Cooper did not receive any response that he can recall after he reported to QA the violations of administrative controls connected with the NPPR on the 1981 spurious valve closure. (citing Cooper Aff. at 12.)



8. We could not confirm whether or not Mr. Cooper's informal, verbal, inquiry received a response. However, the NPPR was resolved. (See Affidavit, Shiffer, et al, 3/5/84, para. 49-51, pp. 21, 22.)

GAP #164, 165, Petition at 48.

It is alleged that:

To further complicate the situation described in #1 above, it is impossible, even by a detailed study of any existing plant drawings, for a technically competent person to determine that removing the output fuses from the SSPS will cause valves 8701 and 8702 to auto-close. (citing Cooper Aff. at 13.)

and that:

The breakdown in corrective action is illustrated by the continuing four year PG&E failure to make the offician (sic) drawings accurate by disclosing the circuit connections responsible for the spurious closures. Ironically, one of the documents destroyed in the great file purge was an informal drawing prepared by Mr. Cooper that accurately depicted the problem. (citing Cooper Aff. at 13,20,21,24 and 26.)

9. It is correct that to a person with no previous knowledge of the relationship between the SSPS and the RHR, it could appear to be impossible to trace the effect of removing fuses from the design drawings themselves. However, tracing has been accomplished by competent technicians with this knowledge.
10. Since the time of the spurious closures, the design drawings at the site and applicable procedures have been revised to reflect this interrelationship. Updating of drawings and procedures is part of the on-going plant operational process.



GAP #166, Petition at 48.

It is alleged that:

PGandE's system for corrective action on reports of design deficiencies is defective itself, due to the absence of a requirement to respond to the originator. As a result, there is no process to alert that originator that a decision has been reached, or its substance. This helps to explain why the pattern in this case -- failure to communicate with Mr. Cooper, ineffective corrective action, and no corrective action to make the official drawings accurate -- is representative, rather than atypical. (citing Cooper Aff. at 20, 24.).

11. Nuclear Plant Operations (NPO) procedures governing processing of requests for modifications and reports of possible design deficiencies have required that responses to requests be returned to the initiating department, particularly if the request was denied. (See Exhibits 1, 2, and 3, attached). The NPO procedures have been changed to provide for informing the originator of the disposition of the request, whether approved or denied. The General Construction practice in this area has been to inform the originating department of such a request as to its disposition, whether approved or disapproved.

GAP #167, Petition at 49.

It is alleged that:

PGandE and the NRC Staff erroneously have claimed that the possibility of spurious valve closures is only six in ten million, too remote to be credible. In fact, the incredible has happened twice in the last three years at Diablo Canyon, and sixteen times nationwide. The most recent incident in November 1983 destroyed an RHR pump. (citing Cooper Aff. at 5-6.)



( ) , ' )

12. Because appropriate corrective action has been taken as approved by the NRC, the exact mathematical probability of spurious valve closures is not of consequence to the safety of operation of Diablo Canyon Power Plant.
13. The November 1983 incident did not destroy the pump as alleged. Although the pump was damaged, it remained functional.

GAP #169, Petition at 49.

It is alleged that:

PGandE's contention that this portion of the plant is not-safety-related is incorrect in light of the post-accident analysis of this system's performance recovery after the TMI accident. PGandE blocked Mr. Cooper's efforts to correct contradictory claims in the FSAR. His supervisor told Mr. Cooper to destroy the forms he submitted to raise the issue in that context. (citing Cooper Aff. at 3, 4, 8, 11, 13, 14-15.)

14. The RHR system meets all Diablo Canyon licensing criteria. (See Affidavit, Shiffer, et al, 3/5/84, Part I, pp. 3-9.)
15. Contrary to the allegation of the petition, Mr. Cooper's affidavit at page 11 shows that his efforts were not blocked but that he was requested to submit his proposed change as a "Design Change Request" which was submitted and properly dispositioned.

GAP #170, Petition at 49.

It is alleged that:

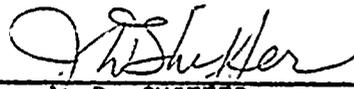
At a 1982 meeting, two PG&E officials failed to correct a false statement to the NRC staff that the company was ignorant of inaccuracies in its Plant Manual for operators. In fact, both individuals had been notified. Mr. Cooper had sent memoranda to the two PG&E management officials. The most charitable explanation for the false



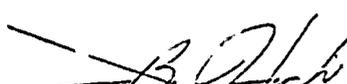
statement to the NRC is that they were not paying attention to the inaccurate statements made of their colleagues. (citing Cooper Aff. at 13-14, 21-22.) In that "best case scenario," the PG&E officials would be innocent of intentional falsification, but guilty of failing to attain (sic) the necessary (sic) character and competence required to operate a nuclear plant.

16. Although the NRC inspection report dated January 19, 1983, reflected that the inspector had interviewed one or more persons who had indicated that they were unaware of the problem with the Plant Manual, both Mr. Giscion and Mr. Thornberry recall, and notes taken substantiate, that this subject was not discussed at the exit interview on January 7, 1983. Therefore, neither had the opportunity to correct this impression. In fact, however, corrective action was already underway. (See also Affidavit, Shiffer, et al, para. 32 and 33, p. 15.)

Dated: March 29, 1984.

  
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J. D. SHIFFER

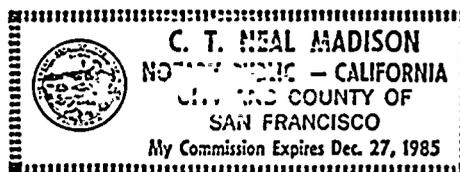
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K. C. DOSS

  
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J. B. HUGH

Subscribed and sworn to  
before me this 29th day  
of March, 1984.

*C. T. Neal-Madison*

Cynthia Neal-Madison  
Notary Public in and for the  
City and County of San Francisco  
State of California  
My commission expires  
December 27, 1985

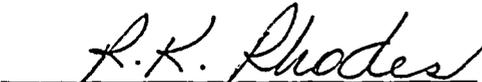




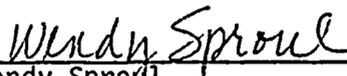
Dated: March 29, 1984

  
J. M. GISCLON

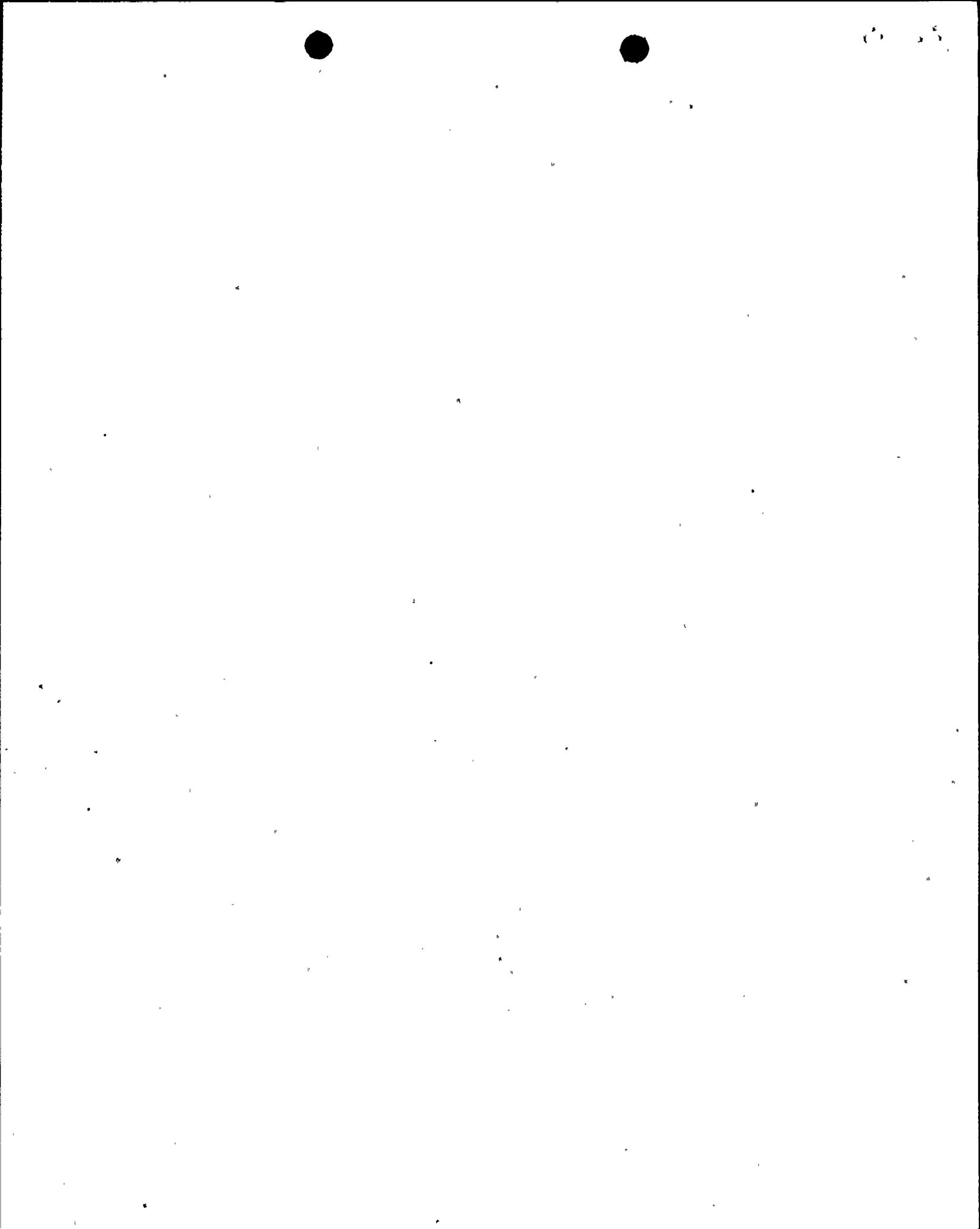
  
R. C. THORNBERRY

  
R. K. RHODES

Subscribed and sworn to  
before me this 29th day  
of March, 1984.

  
Wendy Sproul  
Notary Public in and for the  
County of San Luis Obispo,  
State of California.  
My commission expires  
June 30, 1986.





Dated: March 30, 1984

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K. C. DOSS

Subscribed and sworn to  
before me this 30th day  
of March, 1984.

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Wendy Sproul  
Notary Public in and for the  
County of San Luis Obispo  
State of California  
My commission expires  
June 30, 1986

Affiant unavailable at time of final signature; affirmation will be filed  
upon signing.



PACIFIC GAS AND ELECTRIC COMPANY  
STEAM GENERATION DEPARTMENT  
NUCLEAR PLANT ADMINISTRATIVE PROCEDURE NO. C-12

EXHIBIT NO. 1

TITLE: DESCRIPTION AND REPORTING OF PLANT PROBLEMS

SCOPE

This Administrative Procedure discusses the system employed for reporting of equipment, material, procedural, or other problems and nonconformances which occur at a nuclear plant, and describes the requirements for identification, documentation and reporting, evaluation and determination of cause, resolution, and corrective action.

The basic system discussed in this procedure is applicable to both safety related and non-safety related items and activities, although the evaluation, documentation, reporting, review and approval requirements for the former are more stringent than the latter.

The system established by this procedure is intended to satisfy the requirements for control of nonconformances and corrective action as required by Quality Assurance Procedure 8.1, "Nonconformances and Corrective Actions", and for assuring timely reporting of defects and items of noncompliance as required by Quality Assurance Procedure 8.2, "Verification of Reporting of Defects and Noncompliances (10CFR21)".

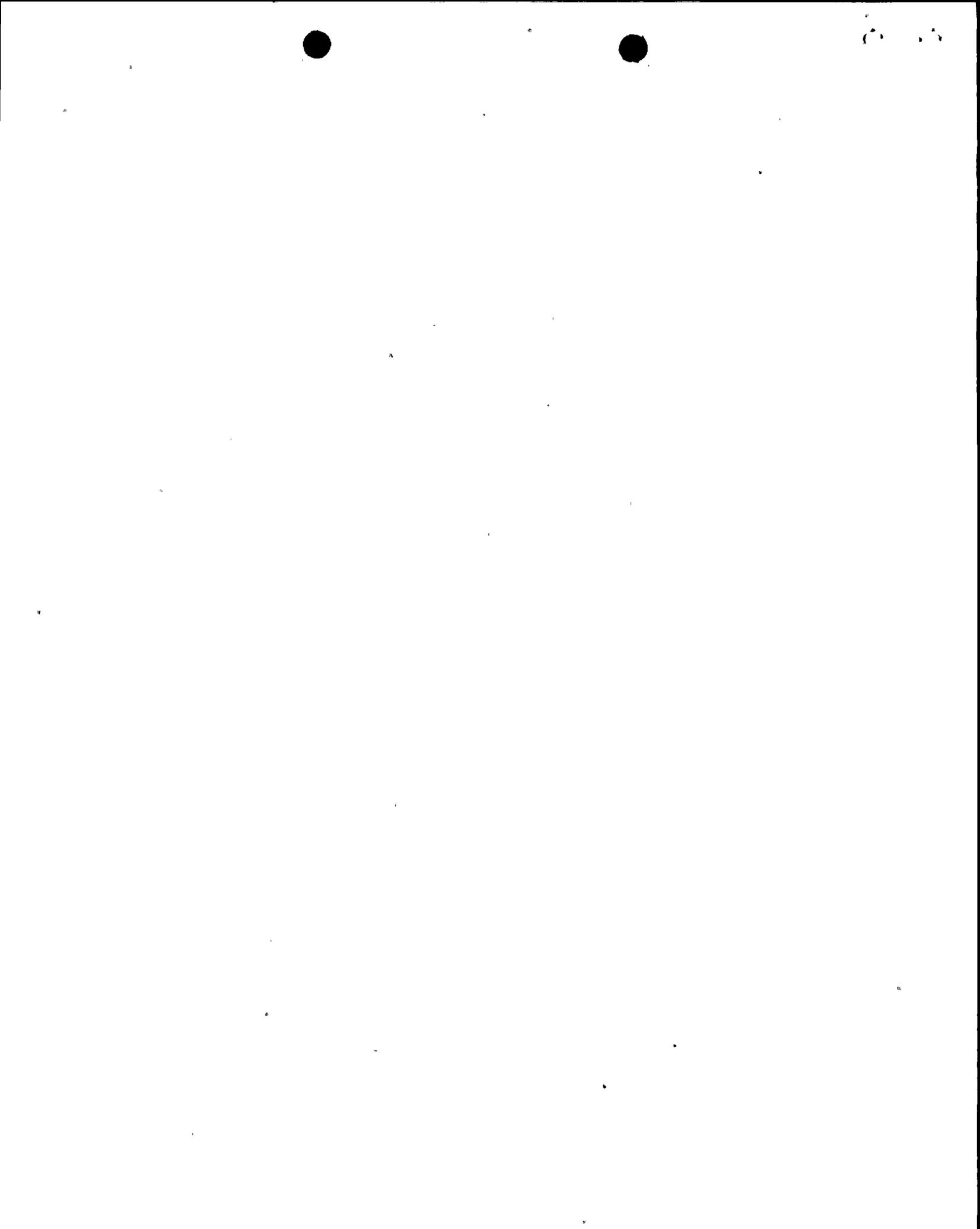
DISCUSSION

It is essential that a formal system be established for dealing with problems which arise in order to assure that they are resolved in a timely fashion, that appropriate personnel and agencies are notified when required, and that problems and corrective action are adequately documented.

Such a system, involving the use of the "Work Request and Report" (Form 23), has long been in use at the Company's power plants as a means whereby operations can inform plant management and appropriate maintenance personnel of actual or potential problems with plant equipment. The use of written work requests, rather than verbal, for interdepartmental jobs is intended to accomplish several purposes:

1. Assure that there is no misunderstanding as to precisely what is being requested.
2. Facilitate scheduling and planning of work.
3. Provide a means whereby both the requesting and requested department can keep track of whether the work has or has not been done.
4. Provide a convenient record of the work performed.

PAGE <u>1</u> OF <u>12</u>	REVISION <u>2</u>	DATE <u>3/6/78</u>
APPROVAL <u>W. H. Davis</u>	<u>1-2/13/78</u>	LATE



## Appendix V

### 4. Implementation of Resolution

- a. The supervisor who receives the Problem Report will carry out the appropriate resolution (assuming, of course, that there is no restriction placed on him by the department head in item 9 of the form). He should also complete items 12 through 14 on the Problem Report form.
- b. Completing Items 12 through 14 of the Nuclear Plant Problem Report Form 76-632.

- 1) Item 12

The supervisor, as well as the person doing the work (if other than the supervisor himself), and the inspector (if there is one) should be identified here.

- 2) Item 13 - Resolution

The results of investigation by the department doing the work and any action taken should be discussed in detail here. If a separate report is warranted, it can simply be referenced to and included as an attachment to the Problem Report form.

- 3) Item 14 - Report Clear

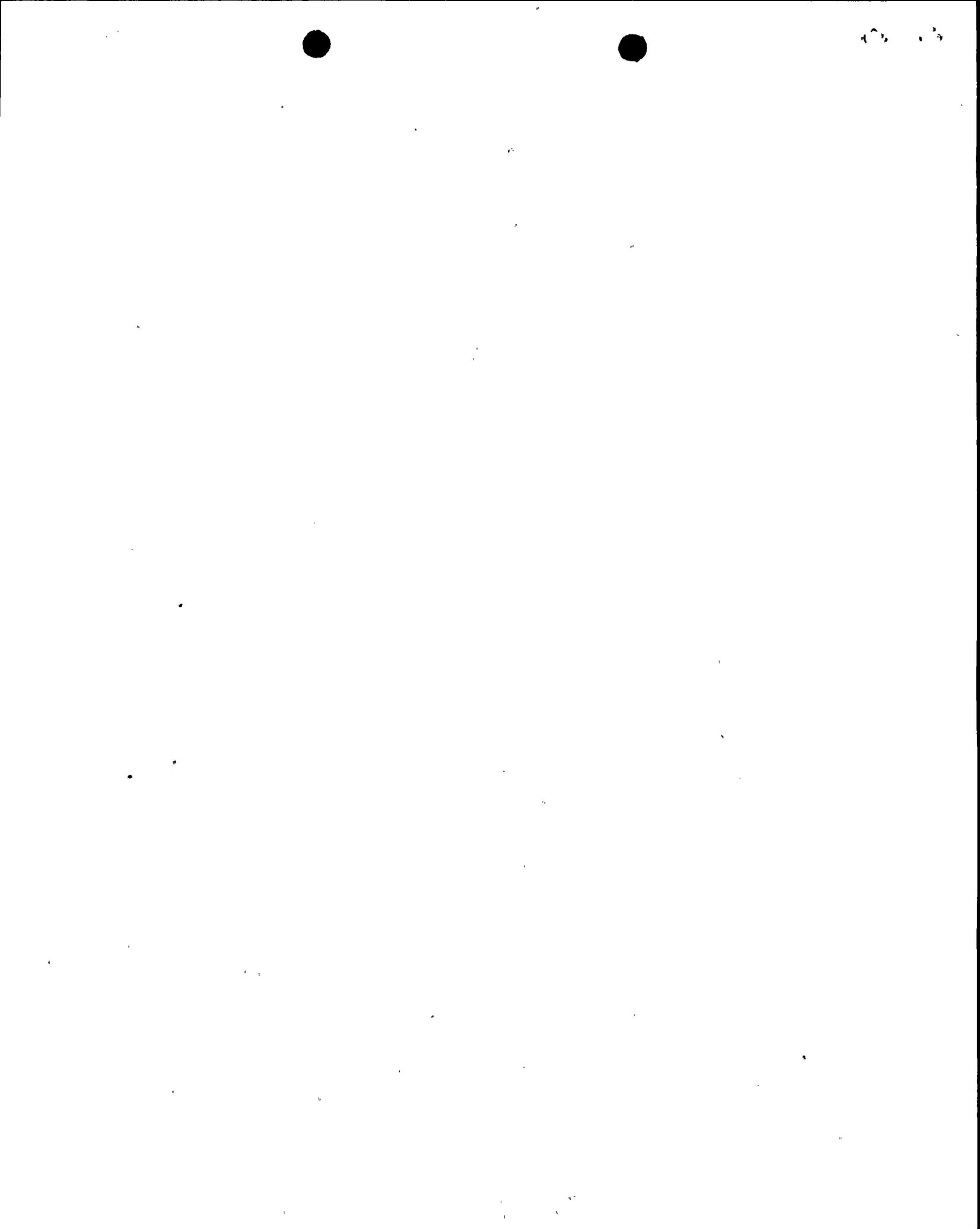
When the job is complete, the supervisor in charge should sign off as "reporting clear" and date the form. If a piece of equipment is involved and he reports clear to some other supervisor, he can so indicate in the space marked "To". Otherwise, the latter is left blank.

- c. Distribution

Following completion of items 12 through 14, the original and 1st copy (still attached) should be returned to the department head for his information.

### 5. Final Plant Management Review, Sign Off and Distribution

- a. The department head reviews the form and sign off on item 15 of the form.
- b. After he has looked at the form, the department head should pass the original and 1st copy to the QC Supervisor for final distribution.
- c. The QC Supervisor should complete items 15 and 16 and distribute the copies as follows:
  - 1) Original and original of any attachments will be sent to the supervisor who originated the Problem Report for his information.



**Appendix V**

- 2) 1st copy and a copy of all attachments to the foreman who supervised the work. The foreman may retain this copy in his files or discard it as he chooses.

d. When the originator receives the original, he should:

- 1) Pull the 3rd copy from his files and destroy it, thereby noting that the problem is no longer outstanding.
- 2) Promptly return the form to the QC Supervisor.

e. When the QC Supervisor gets the original back he should:

- 1) Route it to the Plant Superintendent for his information for those categories of problem reports. The Plant Superintendent instructs the QC Supervisor to send to him.
- 2) Make additional copies of the report and distribute as necessary.
- 3) File the original in the QC file.

**6. Use of Form 76-683 to Document Review Group Findings**

The form 76-683 - Review Group Findings for Nonconformances and Potentially Reportable Items (hereinafter referred to as a nonconformance report) is intended to serve as the basic "minutes" of the Technical Review Group meeting when a problem has been classified as either a nonconformance or potentially reportable. It is also used to document the verification of the completion of the resolution and reporting. Completion of the form is the responsibility of the secretary of the review group.

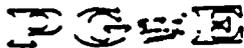
a. Instructions for Completing Form 76-683, "Review Group Findings for Nonconformances and Potentially Reportable Items".

1) Item 1 - Identification

The reports are numbered using a system which is analogous to that used for numbering of Problem Reports except that the responsible department is identified in the third number block instead of the indicating department. Problem Reports and Nonconformance Reports which would otherwise have the same number are differentiated by the prefix which precedes the final block of figures.

Since, in nearly all cases, the item being discussed will have a corresponding problem report, a box is provided for entering the corresponding Problem Report number.





**Pacific Gas and Electric Company**

EXHIBIT NO. 2

NUMBER AP C-12-S1  
REVISION 1  
DATE 1/28/84  
PAGE 1 OF 3



DEPARTMENT OF NUCLEAR PLANT OPERATIONS  
DIABLO CANYON POWER PLANT UNIT NO(S) 1 AND 2

TITLE: ADMINISTRATIVE PROCEDURE  
NUCLEAR PLANT PROBLEM REPORT PROCESSING AND TRACKING

APPROVED: R. C. Thompson 2-27-84  
PLANT MANAGER DATE

SCOPE

To establish a system for initiating and tracking Nuclear Plant Problem Reports (NPPR's).

This procedure and changes thereto requires PSRC review.

DISCUSSION

The NPPR Tracking System will be used to generate reports as required by each department to assist their management on open NPPR's.

RESPONSIBILITY

1. The Work Planning Center has the responsibility for the NPPR reporting system and for NPPR data entry into the NPPR Tracking System.
2. All plant supervisors are responsible to ensure that NPPR tracking information is promptly forwarded to the NPPR clerk.

PROCEDURE

1. After initiating a NPPR, the originator will forward it to his department head or his designee for review and approval.
2. After approval by the originating department head or designee, the NPPR shall be sent to the Work Planning Center for review and assignment to the responsible department(s).
3. The Work Planning Center will make a xerox copy of the NPPR and send it to the NPPR clerk.
4. The NPPR shall be routed to the first responsible department head for initial management review. This step can be performed concurrently with step 2 if the problem is to be accomplished within the originating department.



DIABLO CANYON POWER PLANT UNIT NO(S) 1 AND 2

NUMBER AP C-12-S1  
REVISION 1  
DATE 1/28/84  
PAGE 2 OF 3

TITLE: NUCLEAR PLANT PROBLEM REPORT PROCESSING AND TRACKING

5. The department head shall forward the NPPR to one of his department supervisors for implementation of the required action. The department head will forward the pink copy of the NPPR to the Work Planning Center for Status Updating. After updating, it will be routed to QC for notification of upcoming work. Quality Control will then return the pink copy to the NPPR clerk.
6. After completion of the required action, the department supervisor shall specify in enough details the actions performed in the Implementing Department Section of the NPPR. He then shall return the NPPR to the department head for final management review. The NPPR Update Slip may be used for each transfer within a department if the department desires to track the status between its work centers.  
  
NOTE: The Department Head may delegate the final management review of the NPPR if the NPPR:
  1. Is non-safety related.
  2. Is of a minor nature such as relamping, door repair, leak repairs to non-safety systems, etc., and
  3. Does not require routing to another department for completion.
7. The Department Head will then attach a NPPR Update Slip indicating the next person or department to receive the NPPR. Steps 5 through 7 will be repeated until all actions to resolve the NPPR have been accomplished. Any Department Heads receiving a NPPR from another department will provide NPPR status updating by forwarding the NPPR Update Slip instead of the pink copy.
8. Upon completion of the last action, the NPPR shall be forwarded to the Quality Control Department for final closure. The update slip will be detached and be forwarded to the NPPR Clerk.
9. Quality Control will review the closed NPPR and forward it to the NPPR clerk for final entry into RMS. The yellow NPPR copy will be returned to the originating department by Quality Control.





**Pacific Gas and Electric Company**

EXHIBIT NO. 3

NUMBER AP C-1 S2

REVISION 1



DEPARTMENT OF NUCLEAR PLANT OPERATIONS

DATE 3/16/83

DIABLO CANYON POWER PLANT UNIT NO(S): 1 AND 2

PAGE 1 OF 5

ADMINISTRATIVE PROCEDURE  
TITLE: REQUESTING DESIGN CHANGES AND INFORMATION  
FROM GENERAL OFFICE ENGINEERING DEPARTMENT

APPROVED: \_\_\_\_\_

PLANT MANAGER

DATE

*R. C. T. [Signature]* 3/28/83

SCOPE

This supplement provides guidance on preparation, submittal, tracking, and disposition of Design Change Requests (DCR), Nuclear Plant Operations Comments (NPOC), and Plant Design Comments (PDC).

PROCEDURE

1. A DCR shall be used when requesting design changes or modifications from General Office - Engineering, or when requesting modifications or changes under the DCPD delegation of authority.
2. A NPOC shall be used when requesting information from engineering, as opposed to design work.
3. Preparation and processing of DCR's.
  - a. Provide enough information to clearly state the problem, including the reason for the modification and suggested modification (if known). The plant staff may, at the discretion of plant management, elect to do the design work or not to do the design work. If the choice is made to perform the design work, the requirements of NPAP C-1 must be complied with fully. The designer must produce the design package, and, if important to safety, the safety evaluation.
  - b. Whether or not the design work is to be done by the plant staff, a DCR must be completed by the requestor and reviewed by the Power Plant Engineer before forwarding through channels to the General Office. This review shall be completed before requesting telecon approval of design changes. The Plant Engineer will review the DCR prior to transmittal to Engineering to assure that it will, at this stage, meet the criteria for an acceptable design change. He will then assign a number and forward the DCR, or authorize a telecon request.



DIABLO CANYON POWER PLANT UNIT NO(S) 1 AND 2

NUMBER AP C-1 S2  
REVISION 1  
DATE 3/16/82  
PAGE 3 OF 5

TITLE: REQUESTING DESIGN CHANGES AND INFORMATION  
FROM GENERAL OFFICE ENGINEERING DEPARTMENT

Requested by -- The Plant Manager, or his designee will sign and authorize the DCR. The Plant Manager, Superintendent, and Power Plant Engineer are presently authorized to sign DCR's.

- d. The Plant Engineer will maintain an up-to-date log of all DCR's. The log will indicate the originator's name, assigned number, date approved onsite, date answered, approved or disapproved, and date installation complete. This should be periodically reconciled with projects log.
  - e. The Power Plant Engineer will forward all DCR's to the Supervising Engineer, Nuclear Safety and Engineering.
  - f. When approved DCR's are received onsite, they will be handled in accordance with Supplement 1 to AP C-1.
  - g. If a DCR is returned disapproved, a copy will be forwarded to the originating department head. If desired, he may resubmit the DCR as a revision with amplifying information rebutting the disapproval.
4. Preparation and Processing of NPOC's
- a. A sample NPOC is presented as Attachment 2. The comment should be stated in enough detail to clearly explain the issue or question. The recommendation or action requested must also be clearly stated.
  - b. NPOC's shall be completed as follows:
    - 1) List decimal file reference
    - 2) Attach RMS entry sheet
    - 3) No. - leave blank - Plant Engineer will assign
    - 4) Subject
    - 5) Priority - assign per Attachment 1.
    - 6) Comment
    - 7) Recommendation



DIABLO CANYON POWER PLANT UNIT NO(S) 1 AND 2

NUMBER AP C-1 S2  
REVISION 1  
DATE 3/16/82  
PAGE 4 OF 5

TITLE: REQUESTING DESIGN CHANGES AND INFORMATION  
FROM GENERAL OFFICE ENGINEERING DEPARTMENT

- c. The Plant Engineer will maintain a log of NPOC's with submittal date, approval date, and date answered. This should be periodically reconciled with the General Office projects list.
  - d. The Plant Manager, Superintendent or Engineer are authorized to approve NPOC's.
  - e. When an answer to a NPOC is received, a copy will be forwarded to the originating department head, and the original of the answer will be filed with the original, and ultimately sent to RMS.
5. Plant Department Heads shall carefully consider DCR's and NPOC's submitted from their department. If the reason for the change request or comment is a potential nonconformance or a potentially reportable item, a NPPR shall be filed, in addition to the DCR and NPOC.
  6. In order to properly prioritize the DCR, complete Form 69-10778, submit with the DCR.
  7. Closure of Nuclear Plant Operations Comments (NPOC) and Plant Design Comments (PDC).

**NOTE:** As per item 2 of temporary change dated "from 7/16/81 to next revision" of NPAP C-1, Rev. 2, PDC's were discontinued in favor of the use of DCR's. However, since PDC's were written prior to that date, a closure mechanism for outstanding PDC's is provided.

- a. NPOC's and PDC's will be officially closed by signature of the Power Plant Engineer or his designated alternate on a short report concerning the status of the subject of a particular PDC. This report will specify design change documentation by DCR, DCN, NPOC or etc., number where that information is available. The existence of a trackable document such as a DCR, DCN, NPOC or etc., which covers all the items of a PDC is sufficient justification for closure of a PDC.
- b. In cases where the subject of an NPOC or PDC has been corrected, but no specific design change document can be found, a physical inspection documented in the short report to determine that the subject of the PDC is no longer applicable to the present status of the equipment, facilities or etc., is sufficient justification for closure. The cognizant department head may signify by signature his concurrence with the short report to aid the Power



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
PACIFIC GAS AND ELECTRIC COMPANY )  
 )  
(Diablo Canyon Nuclear Power )  
Plant, Units 1 and 2) )  
\_\_\_\_\_ )

Docket Nos. 50-275  
50-323

CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company has (have) been served today on the following by deposit in the United States mail, properly stamped and addressed:

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Date: March 29, 1984

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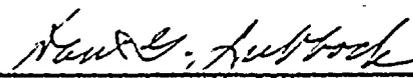
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