



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

RELATED CORRESPONDENCE

DOCKETED
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Docket Nos.: 50-275
and 50-323

U. S. OF SEC. & COM.
DIVISION OF LICENSING & REGULATION
BRANCH

MEMORANDUM FOR: Chairman Palladino
Commissioner Gilinsky
Commissioner Roberts
Commissioner Asselstine
Commissioner Bernthal

FROM: Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

SUBJECT: DIABLO CANYON - STATEMENT BY MR. ISA YIN, NRC STAFF,
APRIL 11, 1984 (BOARD NOTIFICATION NO. 84-082)

In accordance with NRC procedures for Board Notifications the enclosure is provided for your information. The enclosure is a statement by Mr. Isa Yin of the NRC staff regarding conclusions and recommendations of an NRC Review Group that recently evaluated concerns expressed earlier by Mr. Yin.

By copy of this notification, the appropriate Board and parties to the Diablo Canyon proceeding are being provided a copy of this information.

Darrell G. Eisenhut
Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc: See next page

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The Commissioners

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cc: J. F. Wolf, ASLB
G. O. Bright, ASLB
J. Kline, ASLB
T. S. Moore, ASLAB
W. R. Johnson, ASLAB
J. H. Buck, ASLAB
SECY (2)
OPE
EDO
OGC
Parties to the Proceeding



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Diablo Canyon Units 1&2
Docket Nos. 50-275/323 OL

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Diablo Canyon 1

In the past two weeks there had been discussions among the staff and the PG&E representatives on matters concerning whether or not there had been a design control QA program breakdown in the design of large bore (L/B) and small bore (S/B) piping systems. To know the answer, one must first ask the following questions:

1. Had there been adequate personnel training program as well as effective implementation of the program at the site?
2. Was there a sound document control system?
3. Were there sufficient technical and QA procedures to cover all important aspects of design activities?
4. Did responsible personnel always follow established work procedures?
5. Were all components proven to be functionable in accordance with design intentions?
6. Were the licensee audits of design activities effective enough to identify problems for corrective measures?
7. Was licensee forceful in correcting identified problems?



The inspection findings documented in my incomplete draft report said "NO" to all the above questions.

In the past two weeks, I worked together with the Review Team consisted of NRR, IE, Regional management and technical staff. While the difference in professional opinion, in interpretation of regulatory requirements, and in the relative significance of various issues discussed in my draft report still existed, there was a consensus among the team members on what actions should be taken prior to full power operation. The compromises I have made included: (1) that improvement of program and component design could be carried out during low power testings, and (2) that the decision to reinspect all safety related piping systems to avoid structural interferences will be based on whether or not NRC's observation during MS and FW tests will identify any significant deficiencies. The action item list included the following:

- . Complete S/B support computer calculation review.
- . Complete shimming of closely spaced rigid supports, as necessary.
- . Establish program for monitoring thermal gaps, as necessary.
- . Review snubber lockup motions used to evaluate snubber/rigid restraint interactions.
- . Establish "Quick Fix" and "Diablo Problem" review program.
- . Staff inspection of MS and FW hot walkdown.



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- . Complete review of technical allegation issues.
- . Complete regional inspection (including evaluation of IDVP).

The staff's present position regarding the S/B support computer performed calculations is that all 100% of them should be re-evaluated by DCP. This is contrary to the Robert Cloud and Associates conclusion after the IDVP studies. They believe that no additional S/B support calculation was required even in the face of a large amount of identified computational deficiencies. The difference of licensing criteria interpretation and the degree of tolerance in accepting calculation input errors and deficiencies between the staff and Cloud is apparent. The nature of the deficiencies relative to the L/B support calculations documented in the Cloud Interim Technical Reports will be reviewed by the staff in the near future. Results from the review of this issue and five others that are also related to the L/B and S/B piping system design evaluations performed by Cloud will form the basis for determining whether or not there should be additional actions to be taken by the licensee.

Recently, there had been media and public concerns relative to my "surprise" testimony before the Commission, particularly the possibility of management suppression of inspection findings. Let me speak of the truth in this matter. My work performance in the NRC in the last 9½ years was well recognized inside and outside the organization. I had been decorated with NRC Meritorious Service Award and Special Achievement Award, and was sent to Korea and Taiwan to train their technical personnel. My assignment at Diablo Canyon showed that the NRC management really wanted knowledgeable staff to handle the case. During the past 4½ months of working on the case, there had not been any



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management pressure to stop me from inspecting or investigating any matters that I felt were pertinent to the issues, and certainly there had not been any attempt made to discourage me from discussing findings with the Congressional staff, the licensee and the general public. Problems concerning some overlooking of the findings could have been caused by difference in professional opinion, and by the tremendous work loads that have burdened the understaffed NRR organization for so long.

All the experienced NRC inspection and enforcement staffers are aware that identifying licensee program and hardware deficiencies is only 40% of the task. It takes more effort to negotiate for upgraded programs and to follow up on implementation of corrective actions. Being a graduate from Cal Poly, 20 miles away from the Diablo Canyon site, it is my personal interest and commitment to work hard with the staff to resolve all identified issues and problems. Not until all improved programs have been implemented; all identified hardware problems have been corrected; and all reinspections have been conducted, you can certainly be assured that there will be no staff recommendation for the issuance of a full power commercial operation license.



4/11/84

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