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REGION V

JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

April 4, 1985

PGandE Letter No.: DCL-85-139

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-323
Diablo Canyon Unit 2
Response to IEIR 50-323/85-06 -- Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 50-323/85-06, dated March 5, 1985, included one Severity Level IV violation. PGandE's response to this Notice of Violation is enclosed.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

for J. D. Shiffer

Enclosure

cc: R. T. Dodds
G. W. Knighton
H. E. Schierling
Service List

IE28
1/1

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN

NRC INSPECTION REPORT NO. 50-323/85-06

On March 5, 1985, NRC Region V issued a Severity Level IV Notice of Violation (Notice) as part of NRC Inspection Report 50-323/85-06 for Diablo Canyon Unit 2. This Notice cited:

- A concern over 2 discrepancies between design drawings and installation of an additional clamp and a washer on two electrical raceway supports as a result of oversights by QC inspectors to follow quality control procedures.

- A concern over a partially undersized weld on one electrical raceway support as a result of oversights by QC inspectors to follow quality control procedures.

STATEMENT OF VIOLATION

"10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the FSAR and the PGandE Quality Assurance Manual Section V states in part that, 'Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings.

1. Howard P. Foley, Quality Control Procedure, QCPE-9 for 'Installation of electrical raceways, junction and terminal boxes,' states as follows:

   Paragraph 3.1, 'The Project Manager has the responsibility for employing all measures necessary to accomplish the work in accordance with the requirements of the contract documents and this procedure.'

Contrary to the above, during inspections of Electrical Raceway Supports in December 1984/January 1985, the following conditions were identified:

a) Support 2F-117-3-90 M.C. 28

   The support drawing MC-28 called for the installation of a P.1001/C-41 unistrut with two clamps. However, a P-1001 with one clamp had been installed.

b) Support 1178-H-100-4-63

   The installation drawing required that a washer be installed under the bolt which attached a S-6 brace to the unistrut support. No washer was installed.

c) Support 2A-119-6-20

A six-inch weld on six-inch long angle iron added to stiffen the support was undersized for 25 percent (1 1/2") of the length of the weld.

The above supports had been inspected and accepted by the quality control inspectors.

This is a Severity Level IV Violation (Supplement II)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

1a. Support 2F-117-3-90 M.C. 28

Design Change Notice DC2-EC-16532 required the removal of three existing supports and the installation of three new ones. Two of the three new supports called for P-1001 unistruts and the third called for P.1001/C41 unistrut. A misinterpretation of the design drawing by craft resulted in the installation of P-1001 unistruts at all three locations. A QC inspector overlooked this condition during inspection. PGandE Discrepancy Report No. E-3145 was initiated to document the condition when it was identified by the NRC. The support was reworked in accordance with Design Drawing DC2-EC-16532 requirements. Corrective action was completed on January 28, 1985, when the discrepancy report was closed.

1b. Support 2H-100-4-63

This support was incorrectly identified in the Notice as support 1178-H-100-4-63. The correct support number is 2H-100-4-63. Design Change Notice DC2-EC-18480 required a washer to be installed on the west S-6 brace of this support and a torque value of 85 ft/lb applied at that location. The brace was torqued to 85 ft/lb, and no washer was installed. A QC inspector overlooked this condition during inspection. PGandE Discrepancy Report No. E-3148 was written to document the condition when it was identified by the NRC, and the support was reworked to conform to the design drawing. Corrective action was completed on January 28, 1985, when the discrepancy report was closed.

1c. Support 2A-119-6-20

Design required a 1/8-inch fillet weld 6 inches long to be made on an angle used to stiffen the support. The weld was undersized for 25% (1-1/2 inches) of the length of the weld, which exceeded the accepted tolerance of 10%. A QC inspector overlooked this condition during inspection. PGandE Discrepancy Report No. E-3209 was written to document this condition when it was identified by the NRC and was forwarded to Project Engineering in San Francisco for resolution. Project Engineering reviewed the existing condition, determined it was adequate for the structural integrity of the support, and recommended a use-as-is disposition. Corrective action was completed on January 30, 1985, when the discrepancy report was closed.

PGandE recognizes the importance of an adequate and functioning quality program to assure that Diablo Canyon is adequately designed, constructed and operated in a safe and efficient manner. Any actions which significantly impair achievement of the objective are of concern to PGandE. In that context the items identified in this Notice are relatively minor in nature and do not appear to indicate a QC inspection breakdown or an inadequacy in the construction QA program. Rather, they seem to be isolated oversights by two qualified inspectors. While these deficiencies did exist, they did not adversely impact plant safety. These conclusions are based on an evaluation of the discrepancy root causes for generic implications, which included the following:

- The oversights identified in the Notice represent a very small percentage of the inspections performed by contractor Quality Control personnel on a daily basis. For example, a common electrical raceway support may require that over 100 different items and/or processes be inspected by QC.

- The PGandE surveillance program, which monitors contractor activities on a daily basis, has revealed an extremely low rejection to compliance ratio for contractor inspectors. During the period from February 1, 1984 to December 31, 1984, a total of 2685 surveillance inspections of all construction activities were performed with minor discrepancies identifed in only 3.3% of these inspections. The surveillance inspections are a representative sample of the total scope of work performed and cover literally thousands of items and/or processes.

- Project Engineering has evaluated the discrepancies identified and determined that such conditions, had they gone undetected, would not have impacted any safety functions or the safe operation of the plant.

CORRECTIVE STEPS WHICH WILL BE TAKEN

Retraining of QC inspectors in order to enhance job performance is standard practice at Diablo Canyon. However, due to a reduction in personnel, one of the QC inspectors involved with the items cited in the Notice is no longer employed at Diablo Canyon and retraining is not necessary. The other individual is employed by a different contractor and has been retrained in accordance with that contractors' procedures. In addition, the Field Observation Memorandum program, implemented at Diablo Canyon subsequent to the original work on the cited items, provides an additional means through which onsite contractor personnel can identify possibly deficient conditions to PGandE Quality Control for investigation. This program has increased PGandE's ability to identify and correct any deficient conditions at Diablo Canyon. Based on the actions described above, Project Engineering's review of the type and severity of each condition found, the adequacy of existing procedures, and the ongoing PGandE surveillance program, PGandE believes that adequate corrective actions have been taken to prevent recurrence. Therefore, no additional corrective steps are necessary.

PGandE acknowledges the importance of accomplishing all work in accordance with the requirements of contract documents and procedures. The quality control programs in place at Diablo Canyon continually emphasize these goals to assure that quality requirements are met. PGandE believes that the corrective actions as described above have appropriately addressed the concerns expressed in the Notice. These actions are consistent with the relatively minor significance, as well as the isolated nature of the discrepancies.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved for Items 1a and 1b on January 28, 1985, when Discrepancy Reports E-3145 and E-3148 were closed, and for Item 1c on January 30, 1985, when Discrepancy Report E-3209 was closed.