

PACIFIC GAS AND ELECTRIC COMPANY

PG&E + 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

September 10, 1985

PGandE Letter No.: DCL-85-297

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. 50-275, OL-DPR-80
Diablo Canyon Unit 1
Response to IEIR 85-23 - Notice of Violation

RECEIVED
NRC
1985 SEP 12 PM 12:33
REGION V I/F

Dear Mr. Martin:

NRC Inspection Report 50-275/85-23, dated August 6, 1985, contained a Notice of Violation citing three Severity Level IV violations. PGandE previously notified NRC Region V that the response to the Notice of Violation would be submitted by September 10, 1985 (PGandE Letter DCL-85-293, dated September 5, 1985). PGandE's response is provided in Enclosure 1. Also, as requested in NRC Inspection Report 50-275/85-23, responses to other identified areas are provided in Enclosure 2.

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

Sincerely,

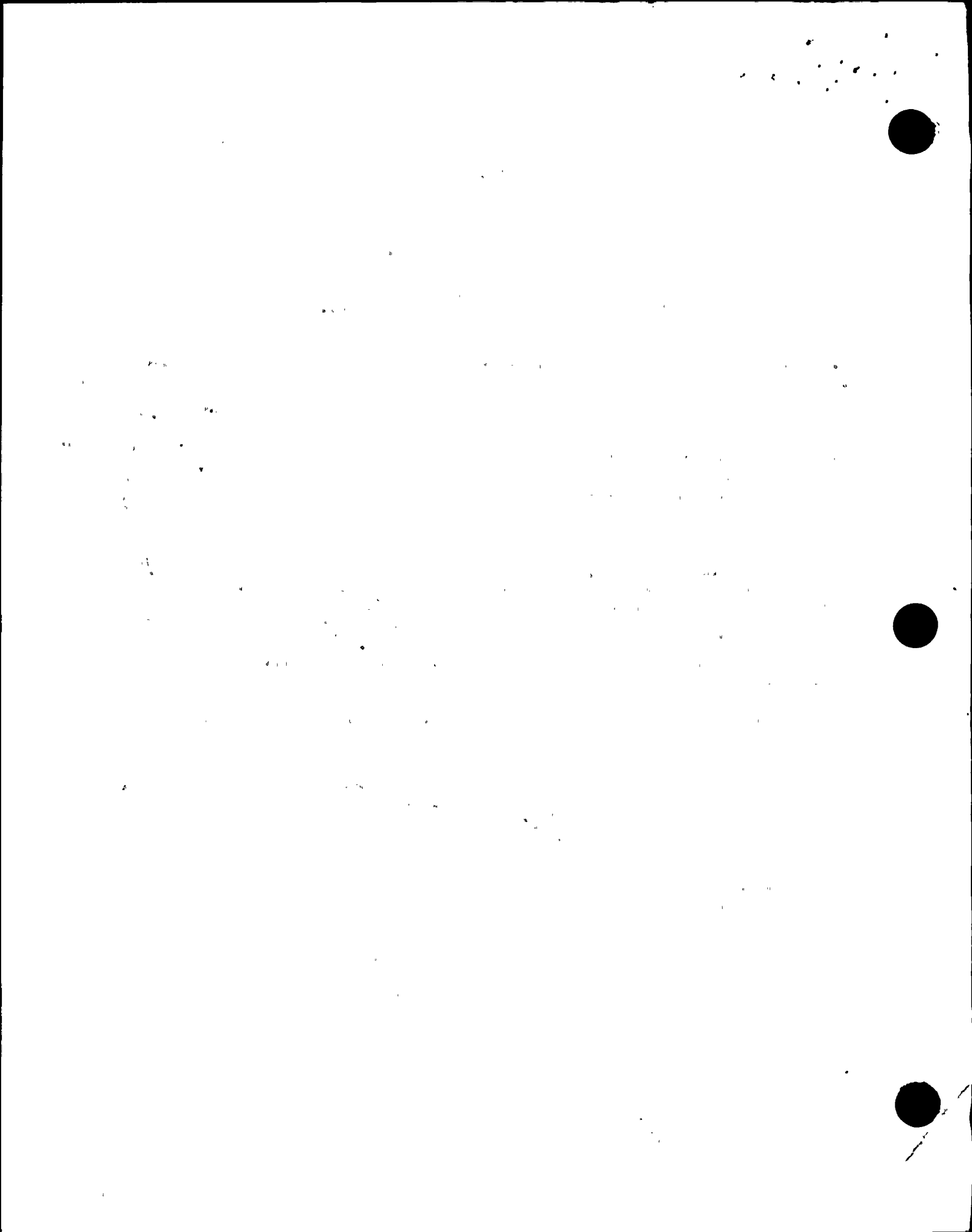
J. D. Shiffer
for J. D. Shiffer

Enclosures (2)

cc: G. W. Knighton
H. E. Schierling

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ENCLOSURE 1

RESPONSE TO NOTICE OF VIOLATION IN NRC
INSPECTION REPORT 50-275/85-23

On August 6, 1985, NRC Region V issued a Notice of Violation (Notice) citing three Severity Level IV violations as part of NRC Inspection Report 50-275/85-23 (Inspection Report) for Diablo Canyon Unit 1. PGandE's responses to these violations follow.

A. MEASURING AND TESTING EQUIPMENT CONTROLS

STATEMENT OF VIOLATION

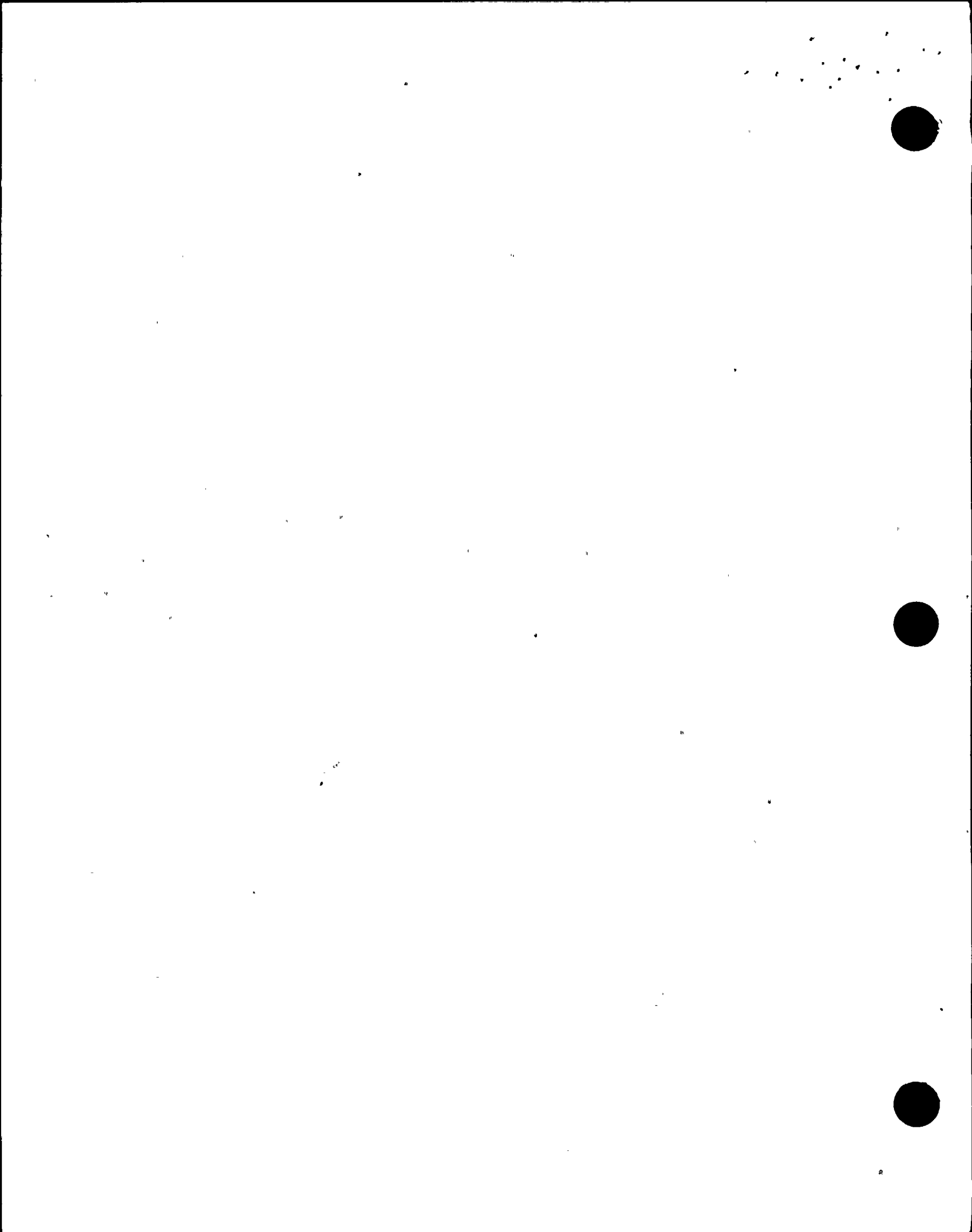
"Technical Specification 6.8.1 states, in part, 'Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978,....'

Diablo Canyon Administrative Procedure AP D-752, Section G.2.b/c, states 'Each item of M&TE will have an M&TE Check-out Log (Form 69-10695-1). The tool room attendant shall assure that all information on the M&TE Check-out Log is completed and that the "Description of Task" section is sufficiently detailed to allow accurate historic review.' 'Test equipment should be returned to the M&TE storage area at the end of each shift.'

Contrary to the above, during the team inspection June 10-28, 1985, the following findings were identified:

1. Item No. 130, torque wrench, 3/8" drive 15-100 ft-lbs. was in the tool issuing room, but there was no M&TE check-out log sheet for this item (Mechanical Department).
2. Item No. 3, torque wrench, 3/8" drive 30-250 inch-lbs. checked out March 21, 1985, but not returned to the tool issuing room (Mechanical Department).
3. Item No. 71, torque wrench, 1/2" drive 300-2500 inch-lbs. checked out April 23, 1985, but not returned to the tool issuing room (Mechanical Department).
4. Item No. 500.0.101, WAHL heat spy was in equipment issuing room, but had not been logged back-in to issuing room (Electrical Department).
5. Item No. 116, Pyrocon Pyromete 140°-1700°F, checked out May 20, 1985, but not returned to the tool issuing room (Mechanical Department).



6. Item No. 134, torque wrench, 3/8" drive 30-250 ft-lbs. checked out April 12, 1985, but not returned to the tool issuing room (Mechanical Department).
7. Equipment No. 1100.1.1, IRD Mechanical Model 306 vibration meter could not be located, and there was no record of its whereabouts (I&C Department).
8. Equipment No. 1004.1.1, a WAHL 2000 temperature probe could not be located, and there was no record of its whereabouts (I&C Department).

This is a Severity Level IV Violation (Supplement 1)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

The disposition of the specific equipment findings identified in the violation are as follows:

1. Item No. 130 is missing and has been identified accordingly. (The violation indicated this item was in the tool issuing room.)
2. Item No. 3 is missing and has been identified accordingly.
3. Item No. 71 was located in the hot shop for decontamination and has been appropriately logged.
4. Item No. 500.0.101 has been appropriately logged as being in the equipment issuing room.
5. Item No. 116 had been issued for work in the Unit 2 containment and has been located and appropriately logged.
6. Item No. 134 is missing and has been identified accordingly.
7. Equipment No. 1100.1.1 was checked out to the Operations Department and was logged in the usage log maintained in the control room by the Shift Technical Advisor.
8. Equipment No. 1004.1.1 was located on a workbench in the I&C Department and was returned to the equipment issuing room and appropriately logged.

The electrical and mechanical maintenance measuring and test equipment (M&TE) Administrative Procedure (AP) D-752 had been extensively revised to more effectively control the issue and use of calibrated tools. The revised procedure was in the process of being implemented during the NRC's inspection of June 10-28, 1985.

The issuance and control of maintenance M&TE had previously been accomplished from the machine shop general tool room. A separate M&TE issue room has since been established which will facilitate the issuance and control of M&TE. This transition to a separate M&TE issue room was in progress during the NRC's inspection and is now complete.

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Maintenance Procedure M-53.1, Revision 3, "Calibration of Torque Wrenches and Torque Wrench Testers," was revised and reissued on June 7, 1985 to include additional requirements for the issuance and control of torque wrenches. The NRC's findings regarding torque wrenches, Item Nos. 3, 71, 130, and 134, occurred prior to the issuance of M-53.1, Revision 3 and therefore no revisions to this procedure are required.

Control of I&C Department M&TE is governed by procedure AP D-450. This procedure requires that whenever an instrument is used for safety-related applications, an entry shall be made on the usage log identifying the instrument and the procedure for which the instrument is to be used. I&C Department M&TE Equipment Nos. 1100.1.1 and 1004.1.1 were controlled in accordance with procedure AP D-450.

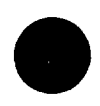
Equipment No. 1100.1.1 was checked out and controlled in accordance with procedure AP D-450 by the Operations Department by logging in the Control Room Usage Log. Although the violation indicates Equipment No. 1100.1.1 could not be located, a review of the Operations Department Usage Log indicates that this equipment was checked out for use during the time of the inspection in accordance with procedure AP D-450. Equipment No. 1004.1.1 was located on a workbench within the I&C Department and verified as not used for safety-related applications. Although not specifically required by procedure AP D-450, the I&C Department's policy is to control all M&TE whether or not it is being used on safety-related equipment. An I&C tailboard was held to reinforce this policy.

On March 18, 1985, the Quality Assurance (QA) Department performed a followup audit on Audit Finding Reports (AFRs) 84-191, -192, and -193 issued to the Mechanical Maintenance Department by QA and concerning M&TE control. This was approximately 3-1/2 months after the Mechanical Maintenance Department had responded to the AFRs. The followup audit also included the Electrical and I&C Departments. During the March 1985 followup audit, the auditors verified that corrective action consisted of an extensive modification of the Maintenance Department's M&TE control program, which had been included in draft procedure AP D-752. The auditors also verified that numerous controls had been initiated by the Mechanical Maintenance Department and that the Electrical and I&C Departments had been effectively implementing a program for the control of M&TE.

Since good progress towards timely corrective action had been evident during the March 1985 followup audit, the Quality Assurance Department determined that it would be appropriate to allow sufficient additional time for the Mechanical Maintenance Department to implement the revised procedure before performing another audit to confirm whether the corrective action was effective. Therefore, another followup audit was scheduled for October 1985. PGandE believes that timely and effective corrective action with regard to QA audit findings had been and was still being taken at the time of the inspection.

In summary, PGandE has investigated and resolved each of the items identified in the violation. At the time of the NRC's inspection, PGandE

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was in the process of enhancing its program to implement controls of M&TE equipment by strengthening procedures and establishing new facilities. Additional training will be provided as corrective actions in response to this violation. With the completion of these enhancements, PGandE believes that its program addresses the issues raised in the violation to assure control of M&TE. PGandE's investigation further concluded that, although documentation of tool control could have been improved during this period, there is no indication that uncalibrated or uncontrolled M&TE equipment was used for safety-related applications.

CORRECTIVE STEPS WHICH WILL BE TAKEN

Users and in-house calibrators of the Maintenance Department's M&TE are receiving additional training to assure that the procedural requirements for the issue and control of M&TE are clearly understood and implemented.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The above Maintenance Department M&TE training is scheduled for completion by September 30, 1985.

RESPONSE TO OTHER NRC OBSERVATIONS

The discussion on page 10 of the Inspection Report regarding Item No. 127 and Equipment No. 1100.1.1 indicates that this equipment was not controlled in accordance with Administrative Procedure NPAP D-5, Paragraph E.2. This procedure requires that whenever a measuring or testing device which is being used in a safety-related activity is discovered to be out of calibration, this instrument will be removed from service and a Nuclear Plant Problem Report issued. The requirements of Paragraph E are only applicable when MT&E is found to be out of the minimum acceptable accuracy tolerance, rather than when the MT&E's calibration date has expired. To assure that MT&E used for safety-related applications is controlled and calibrated, the surveillance test procedures (STPs) require that the M&TE identification number and calibration expiration date be noted on the data sheets. This ensures that M&TE which has exceeded its calibration date is not used in safety-related applications.

The following details respond to the specific findings regarding Item No. 127 and Equipment No. 1100.1.1:

1. Item No. 127 may not have been calibrated by its due date. This item is missing and has been identified accordingly. (The Inspection Report indicated this item was out of calibration.)
2. At the time of the audit, Equipment No. 1100.1.1 was not calibrated by its due date since the vendor responsible for its calibration was awaiting recertification. The vendor has since received its recertification and Equipment No. 1100.1.1 will be recalibrated.

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B. NON-PERFORMANCE OF RADIATION SURVEYS

STATEMENT OF VIOLATION

"Technical Specifications, Section 6.11, 'Radiation Protection Control' states in part: 'Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel exposures.'

Radiation Control Procedure G-1, Revision 8, April 29, 1985, 'Radiation Work Permit (RWP)' Paragraph 2, 'Limitations and Actions' requires, '...(a) Personnel performing work under an SWP/Special Work Permit (SWP) shall not deviate from the job description as stated on the SWP/RWP unless authorized by C&RP personnel.' Paragraph 5.b.2 also requires that C&RP personnel initiating an SWP: '...Perform or evaluate radiation, contamination, and/or airborne radioactivity surveys as delineated by the C&RP Foreman.' Special instructions included on SWP 85-0503 of June 13, 1985, stated in part: '1)...The radiation protection technician shall perform continuous gamma and neutron dose rate measurements, including ingress/egress route and work locations.'

Contrary to the above, on June 13, 1985, the C&RPT assigned to provide continuous surveillance over work performed in the containment with the reactor at full power did not perform the surveys specified on SWP 85-0503.

This is a Severity Level IV Violation (Supplement 1)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

As stated in paragraph 0 of the NRC's August 6, 1985 letter, "During this inspection we reviewed your actions related to failure of a Chemistry and Radiation Technician to perform radiation surveys on May 23, 1985, during a containment building entry with the reactor at full power as described in your Licensee Event Report No. 85-017. As a result of our review we became aware of a similar situation that occurred on June 13, 1985, where again a Chemistry and Radiation Protection Technician assigned responsibility to provide radiological surveillance for workers making a containment entry at full reactor power failed to perform radiation surveys required by your procedures. Accordingly, we find your corrective actions were not effective to prevent recurrence and have enclosed Item II in the attached Notice of Violation."

While the events as stated are correct, in that on June 13, 1985 a C&RP technician did not perform the surveys specified on SWP 85-0503, a review of a similar occurrence on May 23, 1985, involving an experienced and ANSI N18.1 qualified C&RP technician, resulted in the initiation of appropriate corrective action to prevent recurrence. The C&RP technician assigned to cover the job authorized by SWP 85-0503 on June 13, 1985 was aware of the circumstances of the May 23, 1985 occurrence, and the corrective actions taken to prevent recurrence. However, due to the

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concerns described on page 37 of the Inspection Report, the C&RP technician did not perform all of the required surveys associated with this job. The failure to perform the required surveys was not due to any PGandE inaction in response to the May 23 incident, but rather a failure by the individual C&RP technician to exercise proper judgment.

Subsequent to the June 13 incident, tailboard briefings were held, a memorandum to all C&RP technicians on the importance of following prescribed procedures or seeking advice from supervisors was distributed, and a reprimand of the involved C&RP technician took place. PGandE believes that the June 13 occurrence represents an isolated case involving an error of judgment by an individual who has since transferred to another position.

Notwithstanding that this occurrence represents an isolated case, PGandE has initiated further related actions to ensure that C&RP technicians are trained to perform assigned tasks. The related actions are described below in PGandE's response to the violation regarding radiation protection working experience.

CORRECTIVE STEPS WHICH WILL BE TAKEN

The appropriate corrective steps have been taken.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Not applicable.

C. RADIATION PROTECTION WORKING EXPERIENCE

STATEMENT OF VIOLATION

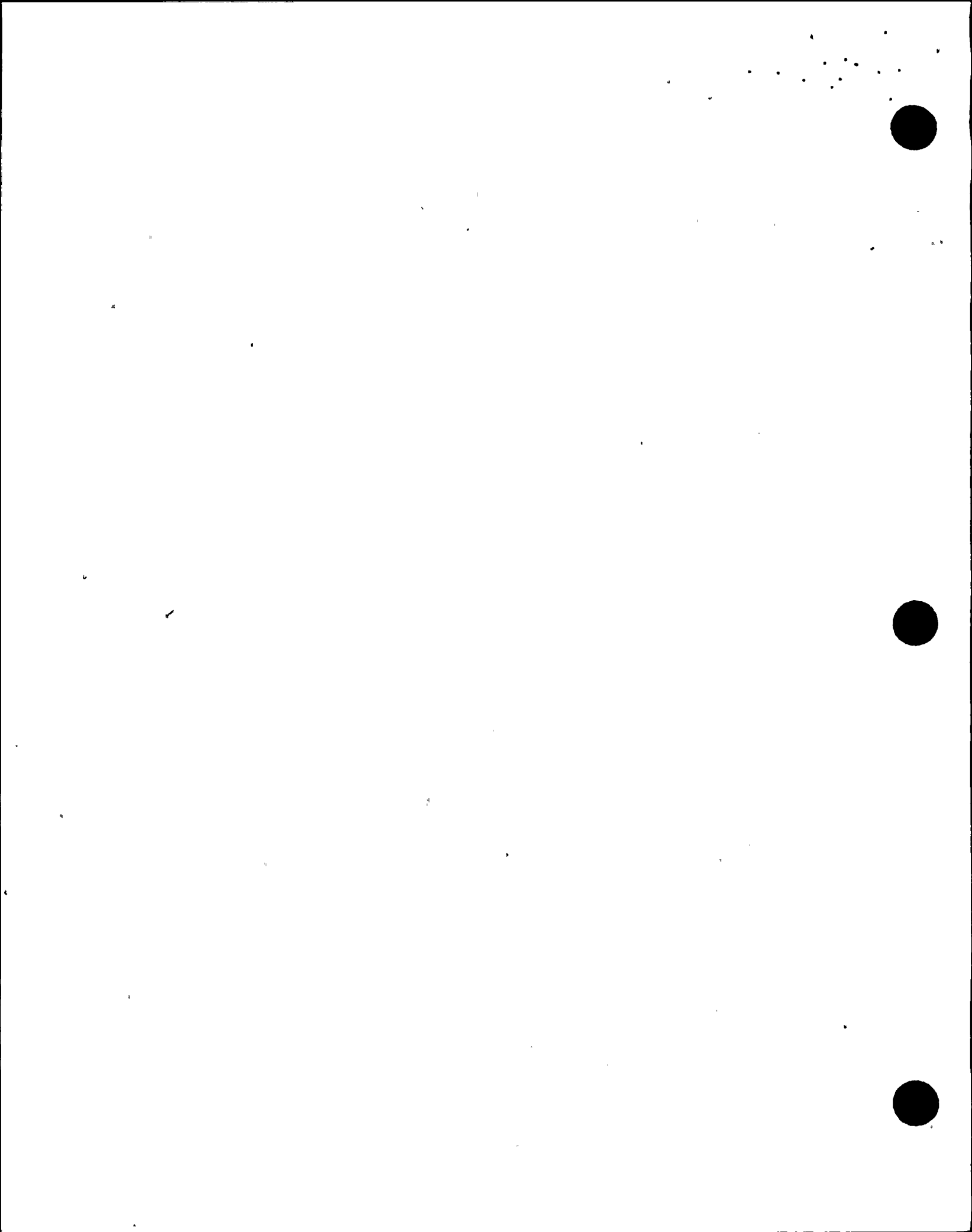
"Technical Specifications, Section 6.3, 'Plant Staff Qualifications' states in part: 'Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions...'. Specifically, ANSI N18.1-1971, Section 4.5.2 states in part: 'Technicians in responsible positions shall have a minimum of two years of working experience in their specialty.'

Contrary to the above, on June 13, 1985, an individual having less than one year of working experience in radiation protection provided radiological surveillance for workers entering the containment with the reactor at full power to perform work under SWP 85-0503.

This is a Severity Level IV Violation (Supplement 1)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

The C&RP technician involved in the June 13, 1985 occurrence had work experience which included 2-3/4 previous years of employment at a commercial PWR in the capacity of a radiochemical technician and employment at DCPD since February 27, 1984 as a C&PR technician. The



individual's previous experience at the other commercial PWR included various aspects of radiation protection, chemistry, and radiochemistry.

PGandE believes that 2 years of combined experience and demonstrated skills constitutes an acceptable basis for selecting an individual for a specific job assignment. However, to further define the status of demonstrated skills capabilities, the Technician Skills Checklist has been revised.

PGandE requires that technicians be qualified to perform their assigned tasks. To provide further assurance, a letter has been sent to all C&RP technicians and supervisors emphasizing and reinforcing the need to complete the Technician Skills Checklist for each technician and to assign technicians only to tasks for which the skill has been demonstrated or to tasks which are under the supervision of a qualified C&RP individual.

Specific steps which have been taken to implement the revised Checklist are described below. These items were already in progress at the time of the inspection.

1. C&RP supervisors are actively pursuing completion of the Checklist. The signoff of certain skills may require that a technician undergo several evaluations. The emphasis is on the technician gaining the work experience to enable an informed judgment to be made in all areas of C&RP work.
2. Technicians assigned to tasks for which a signoff is not documented are supervised by a qualified individual. Only after the technician performs a particular task satisfactorily and in a responsible manner will the checklist item be signed off by the supervisor.
3. The technician, upon completion of specific sections of the Checklist, is then further evaluated by the cognizant Senior C&RP Engineer. After this evaluation is completed to the satisfaction of the Supervisor, the specific section of the Checklist is signed off.

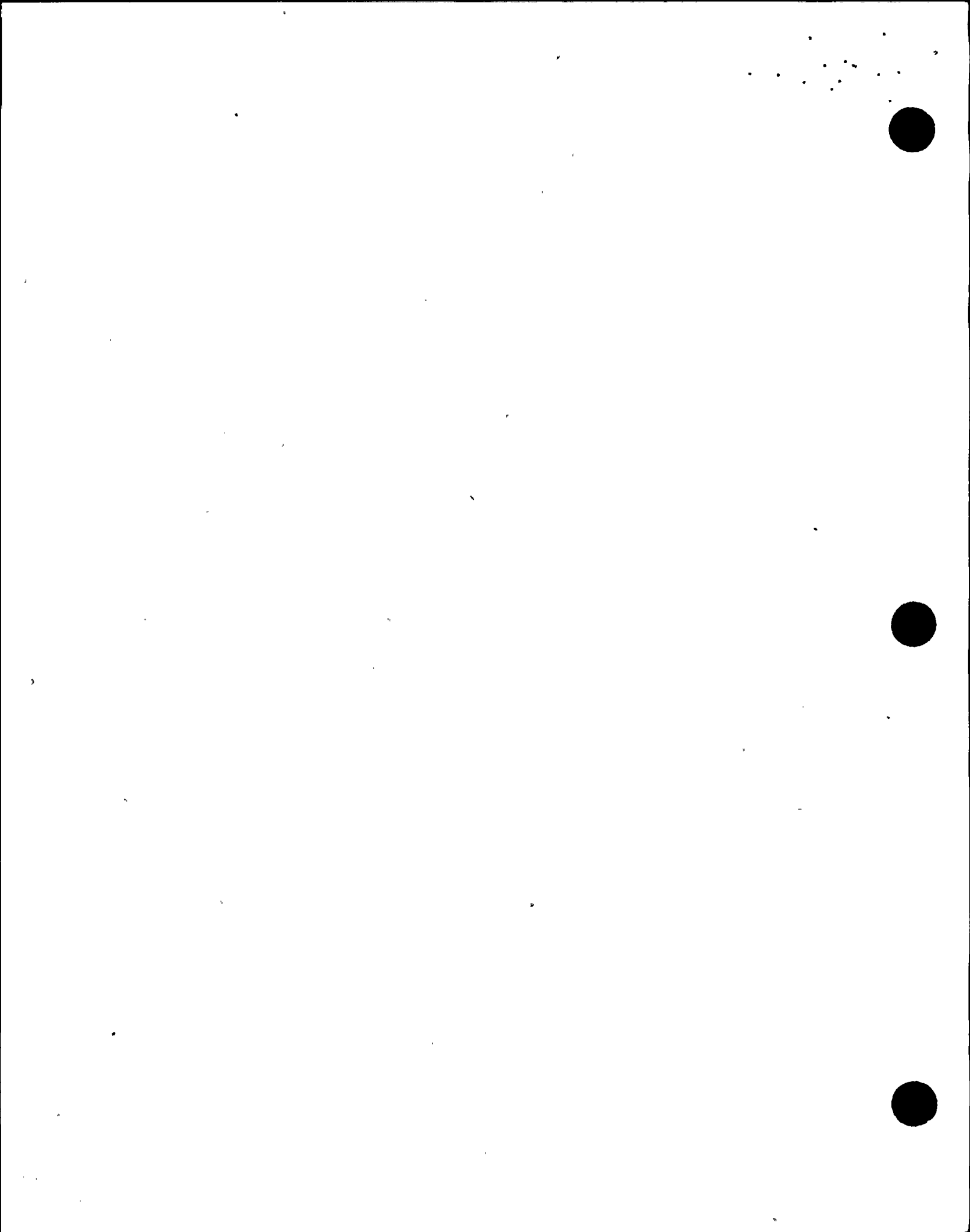
Further, PGandE is currently qualifying and upgrading its technician training program to meet INPO accreditation guidelines for maintenance and technician personnel. Completion of the INPO accreditation is scheduled for February 28, 1987.

CORRECTIVE STEPS WHICH WILL BE TAKEN

The above corrective steps are currently being taken.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Not applicable.



ENCLOSURE 2

RESPONSE TO OTHER IDENTIFIED AREAS IN
NRC INSPECTION REPORT NO. 50-275/85-23

In its August 6, 1985 letter, the NRC requested that PGandE supplement its response to the Notice with a discussion of other areas as specified in Paragraph 0 of the cover letter. PGandE's responses to the items of interest follow.

A. PERSONNEL EXPOSURE RESULTING FROM SKIN CONTAMINATION

"The examination disclosed that there were no significant skin contamination occurrences that would require an adjustment to the individual internal or external dose records. However, current procedures do not require that dose assessments resulting from contamination being deposited on a person's skin be determined. The licensee's staff committed to establish appropriate procedures for assessment of personnel exposures resulting from skin contamination occurrences."

PGandE RESPONSE

The appropriate DCPD procedures for assessment of personnel exposures resulting from skin contamination will be revised and implemented by October 1, 1985.

B. TEST AND CALIBRATION OF RADIATION PROTECTION INSTRUMENTATION

"The inspector verified that the instruments used for the biological survey were in calibration at the same time the surveys were performed. However, the inspection disclosed the same concerns that were identified in Inspection Report 50-323/84-12. It appeared as though no significant improvements were made to resolve the concerns identified in the inspection report. The following was identified:

- o Although calibration instruments were available for use, I&C and C&RP appeared well behind in applying onsite resources to effectively control calibration, inventory, recall, usage, and repair of instruments.
- o Calibration records were deficient in necessary data and supervisory reviews.
- o Out of calibration and currently calibrated instruments were stored together.
- o Missing calibration records.

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- o Failure to perform meter deflection checks as required by procedures.
- o Poor instrument accountability records by both I&C and C&RP.
- o Calibration records were not in agreement with the calibration labels affixed on the instrument.
- o Lack of calibration data for instruments undergoing maintenance or repair.

The inspection revealed that the calibration facility is as described in the FSAR. It is a 'well type' calibrator. Discussions with the I&C and C&RP staff revealed that it is difficult to obtain consistent geometry and reproducibility if the calibration process is rushed. The discussions also revealed that dedicated I&C or C&RP personnel have not been assigned to maintain the calibration of portable instruments.

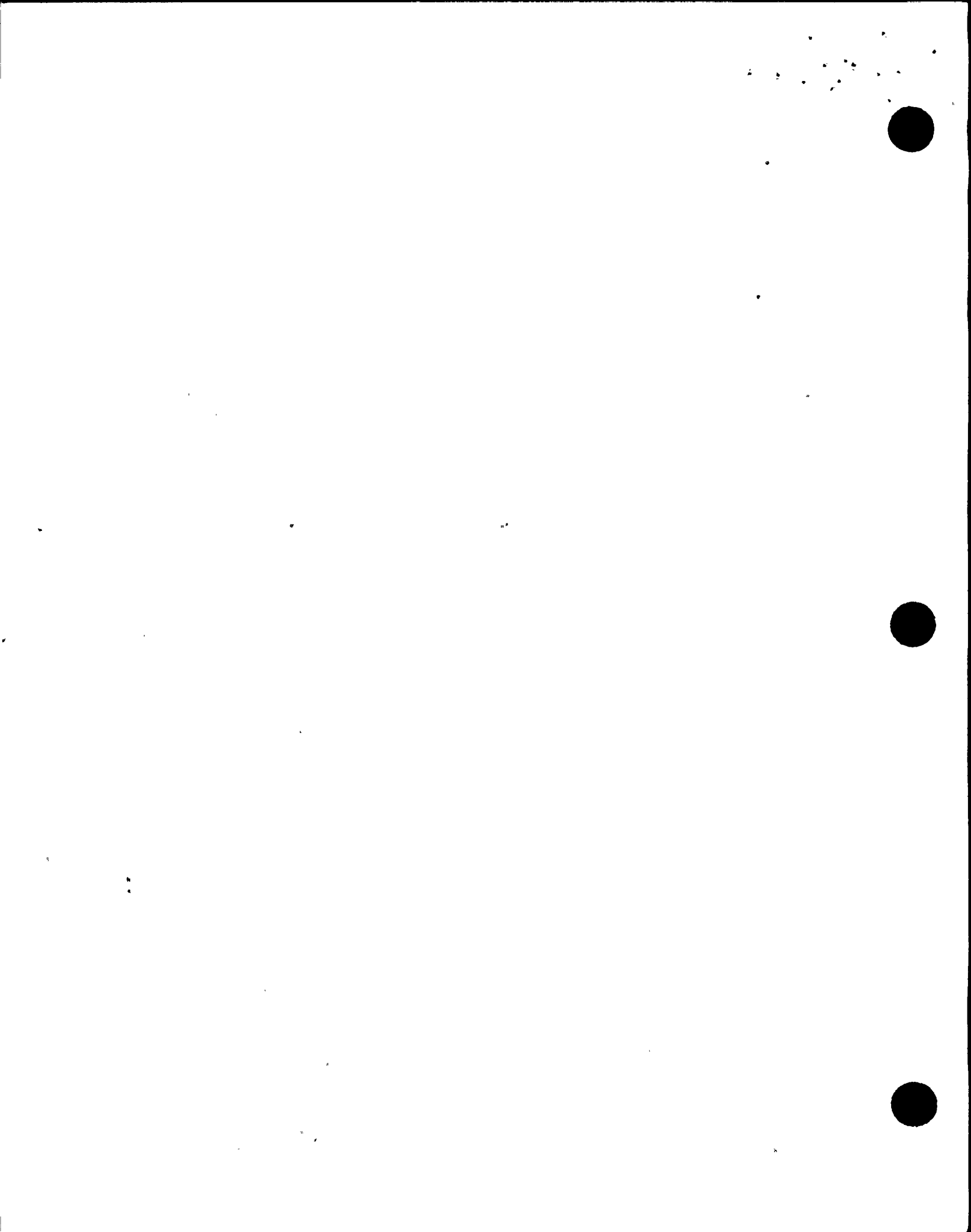
The inspector performed visual inspections throughout the plant to verify that calibrated instruments were being used. No cases of uncalibrated instruments being used were identified.

The above concerns were brought to the attention of the licensee's staff during the inspection and at the exit interview. Licensee personnel agreed with the findings that were brought to their attention and agreed to take the actions necessary to improve their program at a level that is equivalent to ANSI N323-1978. The corrective actions planned are described in licensee memorandum MWS (69-3717) of June 27, 1985. The licensee's corrective actions will be continued to be followed up as an open item (50-275/85-23-13)."

PGandE RESPONSE

The following is a list of action items and scheduled completion dates for maintenance activities required to provide adequate portable radiation monitoring equipment coverage.

1. Completed items:
 - a. Personnel dedicated to maintenance and calibration of equipment.
 - b. Removed out-of-service equipment from Access Control area.
 - c. Removed from source calibration facility all equipment not currently being calibrated.
2. Items to be accomplished by January 1, 1986:
 - a. Review equipment maintenance history files to assure records are up-to-date.
 - b. Update Plant Maintenance Test Schedule (PMTS) File 12 to current inventory and maintenance/calibration requirements.



3. Items to be accomplished by July 1, 1986:

- a. Reduce backlog of equipment awaiting repair.
- b. Reduce backlog of equipment awaiting routine maintenance and/or calibration.

C. POOR PERFORMANCE OF THE QA AUDIT PROGRAM IN IDENTIFICATION OF WEAKNESSES WITH THE SITE'S C&RP TECHNICIAN STAFF

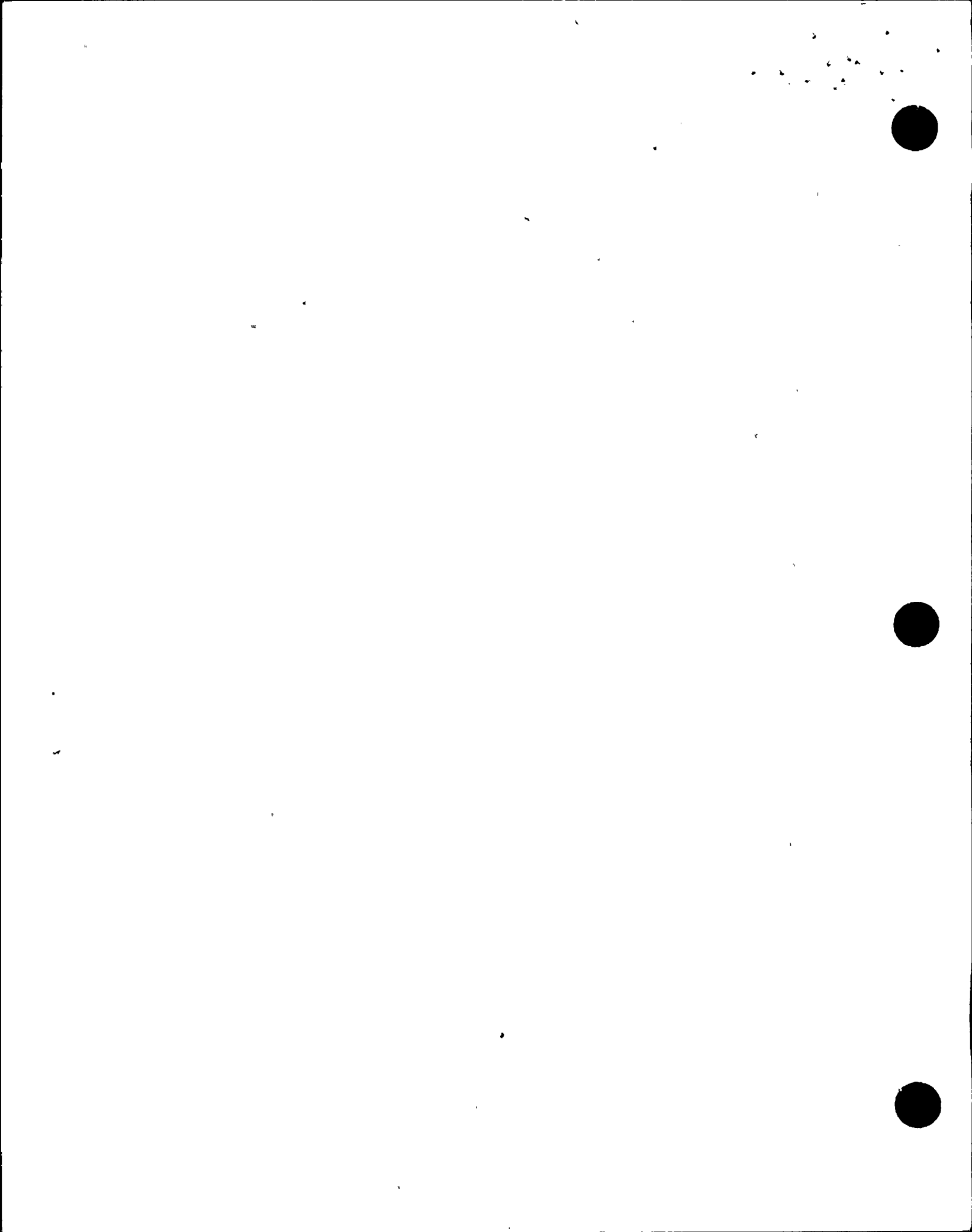
"The review of resumes disclosed that at least 25 percent of the C&RPT staff did not presently meet the ANSI N18.1-1971 qualifications. Approximately 80 percent of the remaining C&RPT that met the ANSI N18.1-1971 qualifications lacked practical experience at a commercial nuclear generation plant. This was consistent with what was found during previous NRC inspections. It should be noted that TS, Section 6.5.2.8.b states that audits should encompass: 'The performance, training, and qualification of the entire unit staff at least once every 12 months.' A review of audit reports, referenced herein, revealed that the audits are more oriented towards verifying the qualification training programs and not the qualification of the individual. The lead auditor for the audit report was not aware if Audit Report 84056P was performed for the purpose of satisfying the TS requirement prescribed under Section 6.5.2.8.b."

PGandE RESPONSE

Audits 83108P and 84056P verified both the C&RP technician qualification training programs and the qualifications of individuals. During Audit 83108P, the qualifications of five C&RP technicians were examined. During Audit 84056P, the qualifications of thirteen C&RP technicians were examined. The individual qualifications reviewed do not appear in the audit report. However, they do appear in the checklist, which is a quality record and has been entered into the PGandE Records Management System. The referenced audits meet the technical specification requirements.

The lead auditor did not recall the specific requirements that had been satisfied on an audit that he had performed approximately one year ago. However, the reference section of Audit 84056P and its audit plan, report, and checklist indicate that the audit had been performed to satisfy the technical specification requirements prescribed under Section 6.5.2.8.b (performance, training, and qualification of the plant staff). The lead auditor's supervisor (Senior Engineer, Internal Auditing) was aware of the technical specification requirement and scheduled the audit in order to satisfy the referenced requirement. The lead auditor's supervisor also approved the audit plan, indicating that it met the applicable auditing commitments.

On February 13, 1985, all auditors were instructed by memorandum to reference the applicable paragraph in the General Office Nuclear Plant Review and Audit Committee (GONPRAC) Charter that requires specific



audits to be performed. The GONPRAC Charter requirements are consistent with the Technical Specification (6.5.2.8) audit requirements. Thus, auditors have been made aware of the technical specification auditing requirements.

