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 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323  
 AUTH. NAME AUTHOR AFFILIATION  
 SHIFFER, J. D. Pacific Gas & Electric Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 870828 ltr re violations noted in Insp Repts  
 50-275/87-30 & 50-323/87-30. Procedure RCP D-600 revised to  
 incorporate conservative procedural controls specified in  
 temporary instruction.

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JAMES D. SHIFFER  
VICE PRESIDENT  
NUCLEAR POWER GENERATION

PGandE Letter No.: DCL-87-240

September 28, 1987

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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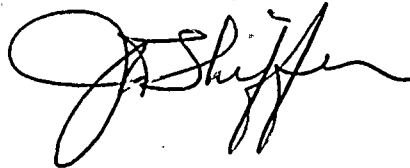
Re: Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Reply to a Notice of Violation in  
IEIR 50-275/87-30 and 50-323/87-30

Gentlemen:

NRC Inspection Report 50-275/87-30 and 50-323/87-30, dated August 28, 1987, contained a Notice of Violation citing one Severity Level V violation regarding the improper use of Temporary Instructions. PGandE's response to this Notice of Violation is provided in the enclosure.

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

Sincerely,



Enclosure

cc: J. B. Martin  
M. M. Mendonca  
P. P. Narbut  
B. Norton  
B. H. Vogler  
CPUC  
Diablo Distribution

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## ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN  
NRC INSPECTION REPORT 50-275/87-30 AND 50-323/87-30

On August 28, 1987, NRC Region V issued a Notice of Violation (Notice) citing one Severity Level V violation for Diablo Canyon Power Plant (DCPP) Units 1 and 2. The statement of violation and PGandE's response are as follows:

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...." Appendix A, Section 1, Administrative Procedures, Items d. and e., specifically identify, in part, "Procedure Adherence and Procedure Review and Approval." Nuclear Plant Administrative Procedure, NPAP E-4, Procedures, Section 4.10, Temporary Instructions, Item 4.10.1.C., states, in part, "Temporary Instructions shall not be used in lieu of an approved procedure...." Item 4.10.3.C. states, in part, "Temporary instructions shall be promptly destroyed or otherwise identified as being obsolete..., when they are no longer in force."

1. Contrary to the above, on July 28, 1987, the Radiation Protection Department was using a Temporary Instruction, dated July 15, 1987, that implemented a proposed revision of Procedure, RCP D-600, Personnel Decontamination and Evaluation. This Temporary Instruction was placed in effect pending approval of revised RCP D-600 by the Plant Staff Review Committee.
2. Contrary to the above, during the period of July 15-28, 1987, the Radiation Protection Department had not destroyed or identified as being obsolete a Temporary Instruction, Technician Response to Frisker Alarms, that had been superseded by a Temporary Instruction that implemented a proposed revision of Procedure, RCP D-600. The two Temporary Instructions specified conflicting requirements.

This is a Severity Level V Violation (Supplement I).

REASON FOR THE VIOLATION IF ADMITTED

PGandE acknowledges that the violation occurred as described in the Notice of Violation and as further described in the Inspection Report.



The issue of compliance with procedures was addressed in PGandE Letter DCL-87-136, dated June 15, 1987, "PGandE Management Actions to Maintain the High Level of Performance at DCPD." As stated in the letter, PGandE management is focusing increased attention on actions to ensure compliance with procedures and evaluating the effectiveness of remedial actions.

PGandE believes these actions are sufficient to preclude recurrence of this event.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

RCP D-600 will be revised by October 15, 1987.

The C&RP Department review of all existing TIs as described above will be completed by September 30, 1987. Any procedural changes identified by this review will be implemented by December 31, 1987.

The formal training of Radiation Protection and Radwaste personnel on the use of TIs will be completed by October 31, 1987.





During the NRC inspection, the Chemistry and Radiation Protection (C&RP) Department was in the process of revising Radiation Control Procedure (RCP) D-600, "Personnel Decontamination and Evaluation," to incorporate more conservative controls governing technician response to automated frisker alarms.

Prior to the approval of this procedure, the more conservative controls specified in the proposed revision of RCP D-600 were under review and were being implemented on a trial basis to determine the impact on personnel exiting the Radiologically Controlled Area (RCA). The proposed revision of RCP D-600, with an unlabeled proposed draft Temporary Instruction (TI), was in the review process at the Radiation Protection (RP) Foreman's office when it was identified by the NRC Inspector. The unlabeled draft TI and proposed revision of RCP D-600 were included in the controlled binder in the RP Foreman's office as part of the trial implementation process. The proposed RCP D-600 revision in no way conflicted with the approved version of RCP D-600.

At the time of the NRC inspection, RP personnel were in the midst of implementing several corrective actions in response to Quality Control Surveillance Report Number QCS 87-0251, dated June 5, 1987. These corrective actions included an audit of the TI binder, assignment of initiation and expiration dates, and establishment of a numbering system for individual TIs. Completion of these actions had been delayed in order to support refueling outage work on Unit 2. As stated in the Inspection Report, Action Requests were initiated to track the completion of these activities. Quality Evaluations (QEs) have also been written to enable Quality Control to track the completion status of these open items. In order to ensure that timely corrective actions are taken regarding identified problems, QEs are periodically reviewed by management, and summary status reports are provided to management on a regular basis.

#### CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

In response to the NRC Inspector's observations, the draft TI located in the RP Foreman's office was immediately labeled "Draft." On July 30, 1987, the draft TI was approved and labeled with the associated number and the issue and expiration dates in accordance with Administrative Procedure E-4, "Procedures."

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

RCP D-600 will be revised to incorporate the conservative procedural controls specified in the TI. As previously described, RP personnel have completed an audit of the TI binder, have assigned initiation and expiration dates for the TIs, and have established a numbering system for individual TIs.

In addition, RP personnel will initiate a comprehensive review of all existing TIs to determine if their content would be more appropriately covered by procedural revision as described in Administrative Procedure E-4. Radiation Protection and Radwaste personnel will be provided with formal training on the use and control of TIs.

