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 AUTH. NAME AUTHOR AFFILIATION
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 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-323/87-26.
 Corrective actions: personnel involved counseled & memo
 issued stressing necessity of making 10CFR50.72 repts
 within required time limitations.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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PACIFIC GAS AND ELECTRIC COMPANY

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

October 2, 1987

PGandE Letter No.: DCL-87-244

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

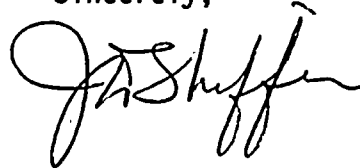
Re: Docket No. 50-323, OL-DPR-82
Diablo Canyon Unit 2
Reply to a Notice of Violation in
IEIR 50-323/87-26

Gentlemen:

NRC Inspection Report 50-323/87-26 (Inspection Report), dated September 2, 1987, contained a Notice of Violation citing one Severity Level IV violation regarding a late 10 CFR 50.72 4-hour nonemergency event report. 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 50-323/87-26

On September 2, 1987, NRC Region V issued a Notice of Violation citing one Severity Level IV violation as part of NRC Inspection Report No. 50-323/87-26 (Inspection Report) for Diablo Canyon Power Plant Unit 2. The statement of violation and PGandE's response are as follows:

STATEMENT OF VIOLATION

10 CFR 50.72 "Immediate notification requirements for operating nuclear power reactors," Section (b)(2) "Four-hour reports," specified the licensee shall notify the NRC...within four hours of the occurrence of...any event or condition that results in manual or automatic actuation of any Engineered Safety Feature (ESF)....."

Contrary to the above, on July 7, 1987, the fuel handling building ventilation system transferred into the iodine removal mode at 1140 hours, but this ESF actuation was not reported to the NRC until 1658 hours.

This is a Severity Level IV Violation (Supplement VIII).

REASON FOR THE VIOLATION IF ADMITTED

PGandE acknowledges that the violation occurred as described in the Inspection Report. As indicated in the Inspection Report and in Licensee Event Report (LER) 2-87-014, DCL-87-194 dated August 6, 1987, the failure to report an engineered safety feature actuation, i.e., the fuel handling building ventilation system shifting to the iodine removal mode, occurred during the initial plant startup after the Unit 2 first refueling outage, when the unit had just experienced a high steam generator turbine trip. Operators were performing numerous activities to return equipment and systems to operable status and inadvertently failed to make the report within the required notification period.

EXPLANATION, CORRECTIVE STEPS TAKEN, AND RESULTS ACHIEVED

As discussed in PGandE letter DCL-87-176, dated July 22, 1987, which responded to a Notice of Violation in Inspection Report 50-275/87-20 and 50-323/87-20 regarding an earlier failure to report an engineered safety feature actuation (inadvertent starting of emergency diesel generator 2-1 on May 14, 1987), the corrective actions described below and noted in the Inspection Report have been taken to preclude recurrence of this type of event. PGandE was in the process of implementing these corrective actions at the time of the July 7, 1987, fuel handling building ventilation system event.

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- A. The personnel responsible for the above events were counseled.
- B. Operations issued a Shift Foreman's memorandum on July 9, 1987, that further stresses the necessity of making 10 CFR 50.72 reports within required time limitations. The memorandum also stresses that making these reports has a higher priority than normal plant activities.
- C. An operator training session, focusing on selected events and proper reportability, was conducted during the regular training week for each shift beginning July 27, 1987.
- D. During each operator training session thereafter, excluding examination sessions, reportability training will be discussed, using specific examples of industry events.
- E. During at least one of the simulator training sessions for each week, excluding examination sessions, reportability of at least one event will be included in a scenario.
- F. When a test is administered for a week of training, at least one reportability test question will be asked.

The emphasis discussed in the last three items will continue until it is determined by PGandE management that the emphasis should be either reduced or increased.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

PGandE believes that the above actions and continued emphasis on reportability in training sessions are adequate to prevent recurrence of late 10 CFR 50.72 reporting.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PGandE is presently in full compliance.

