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 CIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323

AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, R. P. Region 5, Ofc of the Director
 RECIP. NAME RECIPIENT AFFILIATION
 SHIFFER, J. D. Pacific Gas & Electric Co.

SUBJECT: Ack receipt of 870924 ltr informing NRC of steps taken to correct violations noted in Insp Repts 50-275/87-28 & 50-323/87-28.

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OCT 23 1987

Docket Nos. 50-275 and 50-323

Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

Attention: J. D. Shiffer, Vice President
Nuclear Power Generation

Gentlemen:

Thank you for your letter dated September 24, 1987, in response to our Notice of Violation and Inspection Report Nos. 50-275/87-28 and 50-323/87-28 dated August 25, 1987, informing us of the steps you have taken to correct the items which we brought to your attention. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Original Signed
R. P. Zimmerman, Chief
Reactor Projects Branch

cc w/cy ltr dtd 9/24/87:
State of CA

bcc w/cy ltr dtd 9/24/87:
RSB/Document Control Desk (RIDS) (IE01)
Project Inspector
Resident Inspector
B. Faulkenberry
J. Martin
J. Zollicoffer

bcc w/o cy of ltr dtd 9/24/87:
M. Smith

Region V

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PACIFIC GAS AND ELECTRIC COMPANY

P.O. Box + 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

September 24, 1987

MA
10/1/87

PGandE Letter No.: DCL-87-239

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

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 50-275/87-28 and 50-323/87-28

Gentlemen:

NRC Inspection Report 50-275/87-28 and 50-323/87-28 (Inspection Report), dated August 25, 1987, contained a Notice of Violation citing one Severity Level IV violation regarding the maintenance of the environmental qualification file for an electrical connector. 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,
J. D. Shiffer for
J. D. Shiffer

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 50-275/87-28 and 50-323/87-28

On August 25, 1987, NRC Region V issued a Notice of Violation (Notice) citing one Severity Level IV violation for Diablo Canyon Power Plant Units 1 and 2. A statement of the violation and PGandE's response is as follows:

STATEMENT OF VIOLATION

Paragraph (d) of 10 CFR 50.49 requires that each item of electrical equipment important to safety must be identified on a master list and that a qualification file be established and maintained for each item of electrical equipment important to safety.

Contrary to the above requirements, at the time of the inspection, the amphenol type HN (#83-320) connectors located inside Unit 2 Containment for hi-range area radiation monitor, 2RM-30 were not listed on the environmental qualification list nor was a complete qualification file established and maintained for these connectors.

This is a Severity Level IV Violation (Supplement I), applicable to Units 1 and 2.

REASON FOR THE VIOLATION IF ADMITTED

The amphenol connector in question is installed at the containment penetration for hi-range area radiation monitor, 2RM-30. The connector was considered environmentally qualified based upon a General Electric (GE) test of an entire containment penetration assembly which included the connector. The GE penetration was included on the master list and has a separate environmental qualification (EQ) file. In cases where subcomponents, such as a connector, are qualified as part of a larger component, the subcomponent qualification is included in the larger component EQ file rather than in a separate EQ file. Similarly, the subcomponent is not specifically identified on the master list since it is considered to be included as part of the larger component. Therefore, the amphenol connector was appropriately included as part of the larger component on the master list and was specifically addressed in an appropriate EQ file.

PGandE agrees that the GE penetration qualification file was not complete for the amphenol connectors. The amphenol connector which was LOCA-tested as part of the GE penetration test report (PGandE EQ file EH01) is of similar design to that installed at Diablo Canyon. However, the connector was not monitored



for maintaining the signal transmission function during the LOCA testing. Therefore, the GE test report did not provide assurance that the connector would perform a safety function involving signal transmission during an accident.

At the time the GE penetration EQ file was created (June 1981) the high-range area radiation monitors were not required to be environmentally qualified and therefore the GE penetration did not require post-accident qualification for signal transmission. Subsequently, when the high-range area radiation monitors were qualified in June 1982, the requirement for monitoring operability of the amphenol connector during the LOCA testings was overlooked.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

PGandE has obtained a qualification report for the amphenol connector. The report was reviewed and has been incorporated into the GE penetration EQ file. The file and test report demonstrate the qualification of the amphenol connector for accident conditions.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

PGandE will review EQ files to verify that design electrical connector configurations are qualified by the applicable test report.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PGandE is presently in full compliance. The verification of all other electrical connector qualifications will be completed by December 15, 1987.

