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SUBJECT: Forwards proposed changes to Chapter 17 of updated FSAR.

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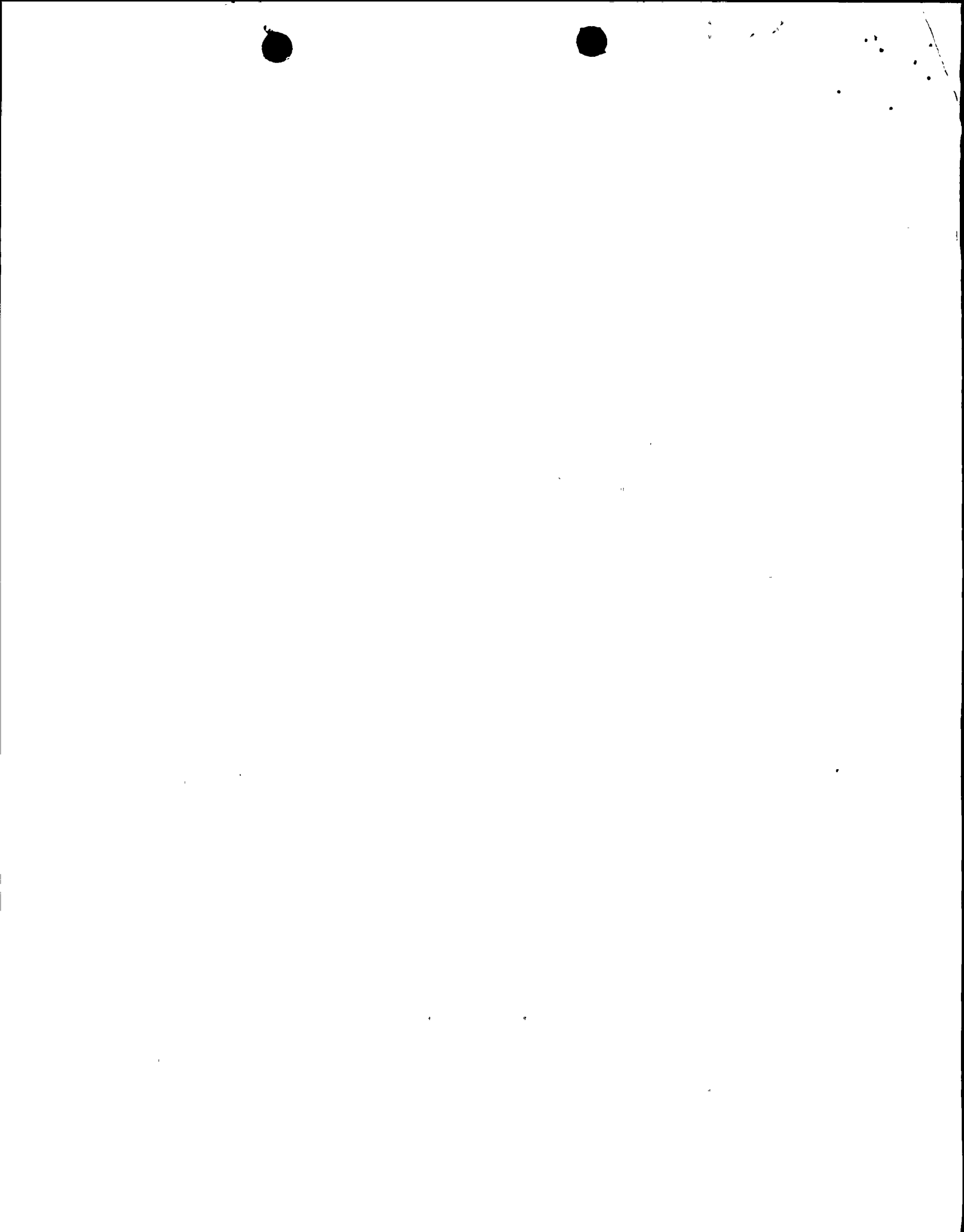
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James D. Shiffer
Vice President
Nuclear Power Generation

January 25, 1990

PG&E Letter No. DCL-90-024



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
Proposed Revision to the FSAR Update, Chapter 17

Gentlemen:

Enclosed are proposed changes to Chapter 17 of the Diablo Canyon Power Plant Final Safety Analysis Report (FSAR) Update. Some of the changes are identified by a "10 CFR 50.54" next to the revision bar in the right margin; PG&E is requesting NRC review and approval of these changes pursuant to 10 CFR 50.54(a)(3). The other changes indicated by a revision bar only are revisions to Chapter 17 made since the September 1989 revision to the FSAR Update. A summary and justification of the 10 CFR 50.54 proposed changes are provided below.

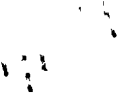
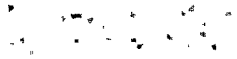
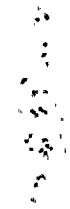
The existing Section 17.1 qualification requirements for the Manager, Quality Assurance (QA), include the requirement that one year of his nuclear power plant experience in the overall implementation of the QA Program be obtained within the QA organization. PG&E proposes to eliminate this requirement. PG&E believes that nuclear power plant experience in the overall implementation of the QA Program gained outside the QA organization also provides the necessary QA Program knowledge and training.

This change is consistent with current industry practices in that the versions of the standard ANSI/ANS 3.1, "Selection and Training of Personnel for Nuclear Power Plants," issued after 1978 have deleted the requirement that the one year of nuclear power plant experience in the overall implementation of the QA Program be obtained within the QA Organization.

Additionally, the existing Figure 17.1-2, "Organization Chart Related to Quality Assurance of Nuclear Power Plants," shows the Manager, QA, reporting directly to the President of PG&E. PG&E proposes to have the Manager, QA, report directly to the Vice President, Nuclear Power Generation, as shown on the enclosed revision of Figure 17.1-2. The appropriate paragraphs of Chapter 17, Section 17.1, "Organization," have also been revised to reflect this proposed organizational change as indicated in the enclosure.

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January 25, 1990

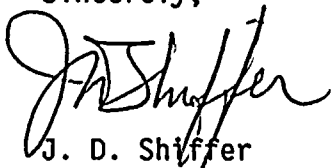
These changes within the PG&E organization are consistent with industry practice, where QA functions are within the purview of the corporate executive who has the overall responsibility for nuclear operations and safety. Additionally, such a reporting structure will allow for more direct management involvement by the Vice President in assuring the adequacy and effectiveness of the QA Program, while maintaining sufficient organizational freedom of the QA Department to ensure its independence.

These proposed changes to the FSAR Update Chapter 17 are not in conflict with any requirements in the Diablo Canyon Technical Specifications.

Based on 10 CFR 50.54(a)(3)(iv), if no comments on the above-mentioned changes are received by March 25, 1990, PG&E will assume the changes are acceptable and incorporate them into the appropriate FSAR Update sections and related documents.

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

cc: A. P. Hodgdon
J. B. Martin
M. M. Mendonca
P. P. Narbut
H. Rood
CPUC
Diablo Distribution

Enclosure

2974S/0077K/RWM/29

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for ensuring the integrity of the financial statements and for providing a clear audit trail.

2. The second part of the document outlines the various methods used to collect and analyze data. It describes how different types of information are gathered and how they are processed to identify trends and anomalies.

3. The third part of the document focuses on the results of the analysis. It provides a detailed breakdown of the findings, highlighting key areas of concern and suggesting potential solutions to address the identified issues.

ENCLOSURE

REVISED PAGES TO DIABLO CANYON POWER PLANT FSAR UPDATE
CHAPTER 17



DCPP UNITS 1 & 2 FSAR UPDATE

Current operations of PG&E are organized under and responsible to the Chairman of the Board and Chief Executive Officer. Among those reporting directly to the Chairman of the Board and Chief Executive Officer are the Vice Chairman of the Board; the President; the Vice President, Community and Governmental Relations; the Vice President, Corporate Communications; the Vice President and Corporate Secretary; the Vice President and General Counsel; and the President and CEO, PG&E Enterprises.

The PRESIDENT is responsible for and directs the planning and development of PG&E's future electric resources and nuclear power generation. These functions include such activities as planning and development, engineering, construction, and nuclear power plant operations. Among those reporting directly to the President are the Senior Vice President and General Manager, Electric Supply; the Senior Vice President and General Manager, Engineering and Construction; and the Vice President, Nuclear Power Generation. In addition, the President's Nuclear Advisory Committee (PNAC) reports to the President. Also reporting to the President may be one or more Project Managers.

The VICE CHAIRMAN OF THE BOARD is responsible for corporate financial matters, distribution and gas supply. Reporting to him are the Senior Vice President, Administrative Services; the Vice President, Finance and Rates; the Senior Vice President and General Manager, Distribution; and the Executive Vice President and General Manager, Gas Supply.

The VICE PRESIDENT, COMPUTER AND TELECOMMUNICATION SERVICES, is responsible for the development, control, and maintenance of centralized computer systems used for safety-related information storage, processing, or analysis. He also provides computer hardware and software support services to other functional groups, when requested. He reports to the Senior Vice President, Administrative Services.

THE SENIOR VICE PRESIDENT GENERAL MANAGER, DISTRIBUTION, is responsible to the Vice Chairman of the Board for general utility operations. Reporting to him through the Vice President, General Services, is the Manager, Materials.

THE MANAGER, MATERIALS, is responsible for providing a centralized procurement function for PG&E. This includes responsibility for the procurement of materials, equipment, services, and supplies for PG&E's nuclear power plants. With respect to such nuclear purchases, the Manager's responsibility and authority are limited to the commercial and administrative aspects of those procurements. He obtains the necessary technical and quality input to such purchases from the appropriate technical groups and assures those requirements are included in the procurement documents transmitted to potential suppliers. He coordinates and participates in the bid evaluation process, and is responsible to evaluate the suppliers and

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DCPP UNITS 1 & 2 FSAR UPDATE

Reporting directly to the Manager, Engineering Support Services, are the Director, ENCON Quality Services and the Supervising Engineer, ENCON Computer Support.

THE VICE PRESIDENT, GENERAL CONSTRUCTION, is responsible to the Senior Vice President and General Manager, Engineering and Construction, for the construction of PG&E power generation and gas and electric transmission facilities, including switching stations and related distribution systems and equipment as assigned. This responsibility commences with the inception of construction planning and, with respect to PG&E's nuclear plants, extends to and includes the development, scheduling, and implementation of the preoperational and startup test programs. Subsequently, the Vice President provides requested construction management and allied support services to the operating plant to assist in the performance of maintenance, modification, or repair activities.

THE MANAGER, STATION AND HYDRO CONSTRUCTION, is responsible to the Vice President, General Construction, for the construction of PG&E steam, hydro, and other electric generation power plants, electric transmission and distribution substations, and communication facilities. Reporting to the Manager, Station Construction, through Construction Superintendents are Senior Site Representatives (Project Superintendent, Resident Engineer or other appropriate title). The Senior Site Representative at each site is responsible for implementation of the construction plans and schedules and for general management of the onsite construction activities.

THE VICE PRESIDENT, NUCLEAR POWER GENERATION, is responsible to the President for the safe and efficient operation of PG&E's nuclear power plants. Reporting directly to him are the Assistant to the Vice President; the Diablo Canyon Plant Manager; the Manager, Nuclear Engineering and Construction Services; the Manager, Nuclear Operations Support; the Director, Nuclear Administration and Support Services; the Manager, Nuclear Safety Assessment and Regulatory Affairs; and the Manager, Quality Assurance. The Vice President, Nuclear Power Generation, approves and signs official PG&E correspondence with the U.S. Nuclear Regulatory Commission or their representatives. The General Office Nuclear Plant Review and Audit Committee and the Diablo Canyon Plant Staff Review Committee report to the Vice President, Nuclear Power Generation.

THE ASSISTANT TO THE VICE PRESIDENT, NUCLEAR POWER GENERATION, assists the Vice President in carrying out his responsibilities.

THE MANAGER, NUCLEAR OPERATIONS SUPPORT, is responsible for directing and controlling technical groups providing support to PG&E's nuclear power plants. In fulfilling this responsibility, the Manager provides administrative, functional, and technical guidance to the plant staffs in such matters as plant operations, maintenance, and the purchase and management of nuclear and emergency diesel generator fuels, management of wastes, refueling, nuclear security, and training.

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DCPP UNITS 1 & 2 FSAR UPDATE

The Manager, Nuclear Operations Support, develops and coordinates implementation of the site and corporate emergency plans. Reporting to the Manager, Nuclear Operations Support, are a staff of offsite technical support personnel.

THE DIRECTOR, NUCLEAR ADMINISTRATION AND SUPPORT SERVICES, is responsible to the Vice President, Nuclear Power Generation (NPG), for quality control for NPG General Office Departments. He is also responsible for providing administrative support to all NPG Departments. This includes consultant procurement, cost and scheduling, and budget-related functions. He is also responsible to maintain a management system for the control of PG&E's quality records related to its nuclear power plants.

THE DIABLO CANYON PLANT MANAGER is responsible to the Vice President, Nuclear Power Generation, for the conduct of all onsite activities related to the safe and efficient operation of the plant. He is responsible to develop, and has been delegated the necessary authority to approve and direct the implementation of, those programs, procedures, and instructions required for the operation of the plant, within limits established by the QA Program, Technical Specifications, and administrative guidelines established by the Vice President, Nuclear Power Generation.

THE MANAGER, NUCLEAR SAFETY ASSESSMENT AND REGULATORY AFFAIRS, is responsible for coordinating with the Nuclear Regulatory Commission for all Nuclear Power Generation matters relating to obtaining, maintaining, amending, revising, and otherwise changing the nuclear plant licenses. Reporting to the Manager, Nuclear Safety Assessment and Regulatory Affairs, is the Diablo Canyon Onsite Safety Review Group.

THE MANAGER, NUCLEAR ENGINEERING AND CONSTRUCTION SERVICES, is responsible for overall project management of all engineering and construction work related to the Company's nuclear plants.

THE MANAGER, QUALITY ASSURANCE, is responsible to the Vice President, Nuclear Power Generation, for management of the QA Program and to assure that the QA Program prescribed by the QA Manual is implemented and complied with by all involved organizations, both internal and external to PG&E. The Chairman of the Board and the President have given him the organizational freedom and delegated the requisite authority to investigate any area or aspect of PG&E's operations as necessary to identify and define problems associated with establishment or execution of the QA Program. They have also delegated to him the authority to initiate, recommend, or provide solutions for such problems to whatever management level is necessary, and to verify that effective corrective action is taken in a timely manner. The Manager, Quality Assurance, is authorized to prepare, approve, and issue standard procedures prescribing a uniform company-wide method of performing an activity affecting quality when such standardization is considered desirable or essential to the effectiveness



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of the QA Program. Such corporate QA Procedures are contained in the QA Manual, and compliance with their requirements by all PG&E-personnel is mandatory.

The Manager, Quality Assurance, shall meet the following qualification requirements: management experience through assignments to responsible positions; knowledge of QA regulations, policies, practices, and standards; and experience working in QA or related activity in reactor design, construction, or operation or in a similar highly technological industry. At the time of initial core loading or assignment to the active position, the Manager, Quality Assurance, shall have six years experience in implementing quality assurance practices, preferably at an operating nuclear plant, or operations supervisory experience. At least one year of these six years of experience shall be nuclear power plant experience in the overall implementation of the QA Program. A minimum of one year of this six years experience shall be related technical or academic training. A maximum of four years of this six years experience may be fulfilled by related technical or academic training.

The Manager, Quality Assurance, is responsible to regularly assess and report on the status, adequacy, and effectiveness of PG&E's QA Program to the General Office Nuclear Plant Review and Audit Committee and other affected PG&E Management. The Manager, Quality Assurance, is responsible to identify, prepare, and submit for approval such changes to Policy Sections of the Quality Assurance Manual as are necessary to maintain it up-to-date and in conformance with current regulatory requirements and PG&E commitments to the U.S. Nuclear Regulatory Commission. He is responsible for the review of all regulatory submittals as they pertain to the QA Program, and his concurrence is required prior to submittal. The Manager, Quality Assurance, is responsible for assuring that the QA Program is effectively implemented at the plant site. The Director, Quality Support, at the plant site reports to the Manager, Quality Assurance. The Director, Quality Support, represents the QA Department and the Manager, Quality Assurance, for plant site activities.

The Manager, Quality Assurance, has the authority and responsibility to stop work should there be a serious breach of any part of the QA Program prescribed by the Quality Assurance Manual, or of technical or regulatory requirements wherein public health or safety could be involved. If stopping work would involve changing a nuclear generating unit's power level or separating such a unit from the PG&E system, the concurrence of the Vice President, Nuclear Power Generation, is required.

One or more PROJECT MANAGERS may report to the President. Depending on the circumstances pertaining to a particular task or corporate project, the President may assign an individual independent of the functional organization units, such as Engineering and Construction, to act as Project Manager. In such instances, the Project Manager reports directly to the President and in general is responsible to him for the overall planning, coordination, and administration of the assigned work. The exact nature and scope of each Project Manager's responsibility and authority are established in writing by the President at the time of the Project Manager's assignment.



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TABLE 17.2

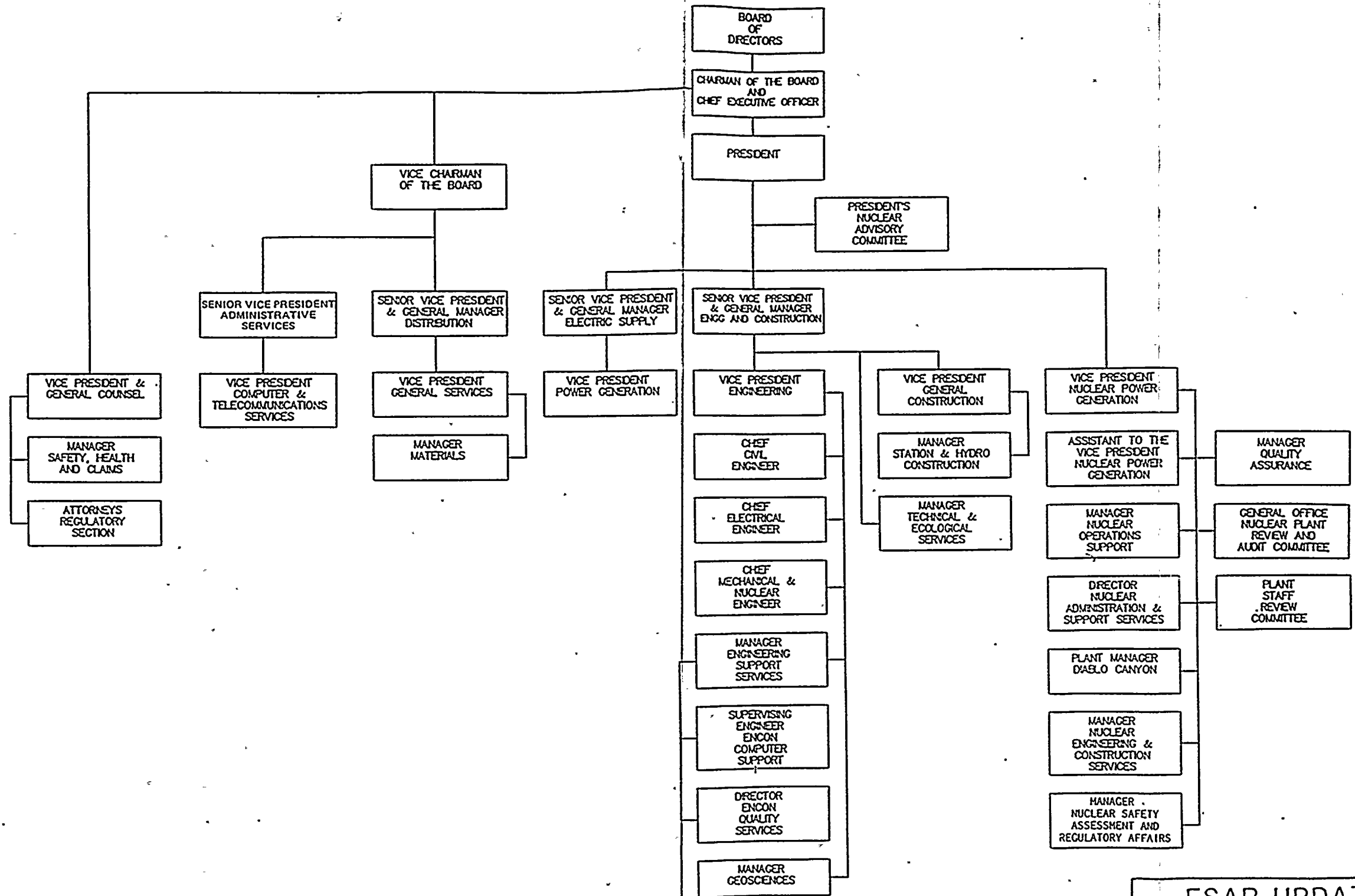
Sheet 4 of 5

Req. Guide	Date	Standard No.	Rev.	Title/Subject	Exceptions
1.33	2/78	ANSI N18.7	1976	Quality Assurance Program Requirements (Operation)	
1.8	2/79	ANSI/ANS 3.1	1978	Personnel Selection and Training	<p>Except that the one year of qualifying nuclear power plant experience in the overall implementation of the Quality Assurance program can be obtained outside the Quality Assurance organizations.</p> <p>Except certain personnel are trained and qualified to the Institute of Nuclear Power Operations (INPO) criteria as described in FSAR Update Chapter 13.</p>
4.15	2/79	—	—	Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment	
BTP APCSB 9.5-1 Appendix A	5/76	—	—	Guidelines for Fire Protection for Nuclear Power Plants	<p>Supplemented by SER, Supplement 13, April 1981, that endorses 10 CFR 50, Appendix R, Section III, Parts G, J, and O.</p> <p>Application of Appendix R, Section III, Parts G, J, and O is clarified and modified by SER Supplement 23, June 1984.</p>
1.26	2/76	—	—	Quality Group Classifications and Standards for Water, Steam, and Radioactive Waste Containing Components of Nuclear Power Plants	<p>Design and construction of Diablo Canyon Power Plant started in 1965 and most of the work cannot comply with the specific requirements of Regulatory Guide 1.26; February 1976. The intent of the Reg. Guide has been followed as shown by comparing the Reg. Guide with Tables 3.2-2 and 3.2-3 in the FSAR.</p>

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SI APERTURE CARD

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FSAR UPDATE
 UNITS 1 AND 2
 DIABLO CANYON SITE
 FIGURE 17.1-2
 ORGANIZATION CHART
 RELATED TO QUALITY ASSURANCE
 OF NUCLEAR POWER PLANTS

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