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SUBJECT: Responds to NRC 900228 ltr re violations noted in Insp Repts
 50-275/89-34 & 50-323/89-34.

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James D. Shiffer
Senior Vice President and
General Manager
Nuclear Power Generation

March 30, 1990

PG&E Letter No. DCL-90-089



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 Notice of Violation in NRC Inspection
Report Nos. 50-275/89-34 and 50-323/89-34

Gentlemen:

NRC Inspection Reports 50-275/89-34 and 50-323/89-34 (Inspection Report), dated February 28, 1990, contained a Notice of Violation citing one Severity Level IV Violation regarding the improper installation of scaffolding. PG&E's reply to the Notice of Violation is enclosed.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. D. Shiffer'. The signature is written in black ink and is positioned above the printed name.

J. D. Shiffer

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

Enclosure

DC2-90-WP-N004

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ENCLOSURE

REPLY TO NOTICE OF VIOLATION IN NRC
INSPECTION REPORT NOS. 50-275/89-34 AND 50-323/89-34

On February 28, 1990, as part of NRC Inspection Report Nos. 50-275/89-34 and 50-323/89-34 (Inspection Report) for Diablo Canyon Power Plant (DCPP) Units 1 and 2, NRC Region V issued a Notice of Violation citing one Severity Level IV Violation applicable to Unit 2. The statement of violation and PG&E's response follow.

STATEMENT OF VIOLATION

10 CFR Part 50, Appendix B, Criterion V reads, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstance and shall be accomplished in accordance with these instructions, procedures, or drawings." License Administrative Procedure AP C-10S1, "SISIP Review of Housekeeping Activities" defines the requirements and responsibilities to assure potentially adverse seismically induced system interactions (SISI) are not created. Step 2.4.5 defines "Non-design" or transient equipment as "scaffolding...or other supplies introduced into the plant in anticipation of future activities." Step 4.1 states "Personnel who introduce 'non-design' or transient equipment into the plant shall assure that unrestrained items or materials...are positioned such that the unrestrained items or materials cannot impact or damage nearby SISIP targets."

Contrary to the above, on December 21, 1989, construction personnel, in preparation for modifications to the plant process computer, erected scaffolding in the three Unit 2 vital battery rooms such that the scaffolding was attached to the vital battery supports without assuring that the battery would not be adversely impacted during a seismic event.

This is a severity level IV applicable to Unit 2.

REASON FOR THE VIOLATION IF ADMITTED

PG&E acknowledges that the violation occurred as described in the Inspection Report. As discussed in the Inspection Report, Administrative Procedure (AP) C-10S1 (Revision 3), "SISIP Review of Housekeeping Activities," requires that an evaluation for seismic interaction concerns be performed for "non-design" or transient equipment; however, no such review was performed for scaffolding erected in the three Unit 2 vital battery rooms. A review performed by PG&E following identification of this problem determined that General Construction (GC) personnel, who were responsible for erecting the scaffolding, had not been trained on AP C-10S1, and were not cognizant of its requirements. GC



personnel had not been trained on AP C-10S1 because the GC lead engineers had determined that this procedure was not applicable to their departments. This decision was based on the lead engineers' evaluation that AP C-10S1 described the Quality Control Department responsibility to implement a program that required surveillances of affected areas in the plant to detect seismic interactions created through improper housekeeping practices and maintenance activities, and therefore did not specifically address any activities that were the responsibility of GC. Per AP C10S1, Quality Control is required to conduct plant walkdowns to insure compliance with housekeeping and seismic concerns.

GC followed the guidance of an October 30, 1989 memorandum to process and route construction scaffolding requests. This memorandum describes the process and clarifies the responsibilities of Nuclear Engineering and Construction Services (NECS) Engineering, Operations, and Quality Control Departments for scaffolding construction. The memorandum specifies that the Operations Department be requested to evaluate the scaffolding request to determine any effects on plant equipment operability. When the erection of the scaffolding is complete, the GC Scaffolding Coordinator is required to contact NECS Civil Engineering, who then performs a walkdown to review seismic interaction concerns and give final approval.

Contrary to the guidance of the October 30, 1989 memorandum, the Operations Department was not requested to review the scaffolding request for the battery rooms, nor was NECS Civil Engineering requested to perform a seismic interaction walkdown of the scaffolding. The GC Scaffolding Coordinator had determined that the wood boxes, as described on the request, did not constitute scaffolding and, therefore, did not require an evaluation by the Operations Department or a seismic interaction walkdown by NECS Civil Engineering.

Additionally, no guidance was provided to the scaffolding crew for the modification of scaffolding requests in the field. The GC carpenter foreman and the GC electrical foreman walked the job down, and with the concurrence of the electrical engineer, decided to erect tube and coupler scaffolding instead of the wood boxes. This decision was made primarily due to a lack of fire retardant plywood on site to construct the boxes. The electrician, who was aware of the need to protect the exposed battery conductor, supervised the construction of the tube and coupler scaffolding. However, he did not notify the GC Scaffolding Coordinator of the change from wooden boxes to tubular scaffolding.

Also, Project Instruction (PI)-67, "Construction Work Package Development and Control Using Work Orders," did not contain adequate instructions for the processing and routing of scaffolding requests at the time this request was developed. Additionally, the work order did not contain a reference to the scaffolding request in any of the work activities.

On December 21, 1989, a Quality Assurance (QA) inspector was conducting a walkdown of the vital batteries to compare the as-built configuration to a design change notice. This walkdown was conducted as a follow-up to the vital



electrical Safety System Functional Audit and Report. During this walkdown, the QA inspector noticed that scaffolding had been erected over the 2-1, 2-2, and 2-3 batteries. The QA inspector reviewed AP C-10S1 to determine who should be contacted, and subsequently called the GC electrical engineer who had originated the scaffolding request and informed him of his concern that scaffolding had been erected over the batteries during full power operation. Per AP C-10S1, it is the responsibility of the contacted individual to either eliminate the concern or initiate an Action Request (AR). The electrical engineer did not accomplish either of these responsibilities because he was not aware that the QA inspector's discovery was based on a seismic concern.

On January 22, 1990, an engineering analysis determined that the battery rack braces were adequate to resist the temporary scaffolding loads, and that the maximum calculated Hosgri displacements did not exceed the minimum as-built gaps between the scaffolding and the battery terminal.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The scaffolding in all three battery rooms was removed.
2. PI-67 was revised on January 2, 1990, after the event occurred, to contain appropriate instructions for the processing and routing of scaffolding requests.
3. Personnel involved in the construction of the scaffolding were tailboarded on the circumstances surrounding this event, and instructions were promulgated that all scaffolding requests require a review by NECS Civil Engineering for seismic interaction concerns prior to any construction.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

1. A new administrative procedure (AP) will be written for use by both plant and construction personnel to provide guidance for erection of scaffolding and scaffold-type structures. The procedure will incorporate seismic evaluation information, and establish a tracking system for scaffolding erection. The tracking system will include:
 - (a) The maximum allowed time between scaffolding erection and performance of an evaluation for seismic interaction concerns.
 - b) The consideration of the mode of plant operation as a part of the seismic interaction evaluation.
 - c) The requirement to perform a seismic interaction evaluation when scaffolding is modified.

The appropriate plant and GC personnel involved with scaffolding construction, supervision, and evaluation will be trained on this new procedure.



2. AP C-10S1 will be revised to clarify responsibilities for identifying and communicating seismic concerns by requiring the initiation of an AR upon identification if a concern cannot be immediately resolved.
3. The appropriate plant and GC personnel will be trained on AP C-10S1.
4. A review of plant administrative procedures will be conducted to ensure that appropriate GC personnel have been trained on all appropriate plant administrative requirements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is in full compliance with the requirements concerning instructions to workers involving seismic review of scaffolding and scaffold-type structures through AP C-10S1 and of PI-67. The new procedure will be an enhancement to the existing program. All actions to be taken to avoid further violations are scheduled for completion by July 1, 1990.

