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ACCESSION NBR:9007020123 DOC.DATE: 90/06/25 NOTARIZED: NO DOCKET #
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50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
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SUBJECT: Responds to violations noted in Insp Repts 50-275/90-08 & 50-323/90-08.

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James D. Shiffer
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June 25, 1990

PG&E Letter No. DCL-90-162



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 Notice of Violation in NRC Inspection Report
Nos. 50-275/90-08 and 50-323/90-08

Gentlemen:

NRC Inspection Report Nos. 50-275/90-08 and 50-323/90-08 (Inspection Report), dated May 24, 1990, contained a Notice of Violation citing a Severity Level IV violation regarding operability of the Unit 2 fuel handling building (FHB) ventilation system. PG&E's response to the Notice of Violation is provided in Enclosure 1. The Inspection Report also requested that PG&E address (1) the control of FHB doors during the first two refueling outages, (2) the adequacy of safety analyses for the FSAR Update discrepancies identified, and (3) the adequacy of the FSAR Update review and the design memoranda review conducted in 1989. These items are also addressed in Enclosure 1.

The Inspection Report also provided examples of occurrences where the significance or scope of applicability of technical issues were apparently initially not fully evaluated. Enclosure 2 describes actions being taken to address this concern.

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
P. P. Narbut
S. A. Richards
H. Rood
CPUC
Diablo Distribution
INPO

Enclosures

DCO-89-TN-N015
DC2-90-TN-N015
DCO-89-TN-N081
DCO-81-EN-N003
DCO-90-TN-N019

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ENCLOSURE 1

REPLY TO NOTICE OF VIOLATION IN NRC
INSPECTION REPORT NOS. 50-275/90-08 AND 50-323/90-08

On May 24, 1990, as part of NRC Inspection Report Nos. 50-275/90-08 and 50-323/90-08 (Inspection Report), NRC Region V issued a Notice of Violation citing a Severity Level IV violation for Diablo Canyon Power Plant (DCPP) Unit 2. The statement of violation and PG&E's response follow.

STATEMENT OF VIOLATION

Technical Specification 3.9.12 specifies that two Fuel Handling Building Ventilation Systems shall be operable. Action statement b. states, "With no Fuel Handling Building Ventilation System operable, suspend all operation involving movement of fuel within the spent fuel pool or crane operation with loads over the spent fuel pool ..."

Contrary to the above, between March 12 and March 15, 1990, no Unit 2 Fuel Handling Building Ventilation Systems were operable and operations involving movement of fuel within the spent fuel pool and crane operation with loads over the spent fuel pool were conducted. The Fuel Handling Building Ventilation System (FHBVS) was not operable in that it could not perform its specified function to maintain a negative pressure greater than or equal to 1/8 inch Water Gauge relative to the outside atmosphere because two FHBVS barrier doors had been erroneously blocked open. Licensee test results showed that only 1/16 inch water gauge of negative pressure could be maintained.

This is a Severity Level IV violation, applicable to Unit 2 (Supplement I).

REASON FOR THE VIOLATION IF ADMITTED

PG&E acknowledges that the violation occurred as described in the Inspection Report. The cause of this event was failure of an engineer during a review of fuel handling building (FHB) boundaries to recognize that personnel doors constitute part of the FHB pressure boundary.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The following corrective steps were taken regarding this event:

1. The FHB supply fans were shut off following the first pressure test of the FHB.
2. The supply fans were administratively tagged out to ensure that the Technical Specification requirements were satisfied.



3. All hoses were removed and the FHB boundary doors were secured.
4. Warning signs were placed on each Unit 2 personnel door in the FHB stating that shift foreman permission is required to block open the door.
5. The Unit 2 FHB perimeter was walked down to ensure that all other personnel doors were operable.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The following corrective actions were or will be taken to prevent recurrence of this event:

1. Surveillance Test Procedure M-5, "Routine Surveillance of Fuel Handling Building Ventilation System," was revised to add all personnel entrance/exit doors leading to the FHB to the list of doors required to be closed for FHB ventilation system operability.
2. Warning signs were installed on all Unit 1 FHB entrance/exit doors.
3. A design criteria review will be formulated and performed to identify doors with functions that are important to safety. This review will provide guidance to the plant staff for control of doors and is targeted for completion by December 31, 1990.
4. A memorandum discussing the details of this event will be prepared for training of Maintenance, Operations Services, and appropriate Engineering personnel at tailboard sessions by July 31, 1990.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E was in full compliance when the hoses were removed and all the FHB doors were secured.

ADDITIONAL INFORMATION REGARDING THE VIOLATION

The Inspection Report requested that PG&E also address the control of the FHB roll-up doors during the first two refueling outages and the adequacy of the safety analyses for all FSAR Update discrepancies identified. Additionally, PG&E was requested to address the adequacy of the FSAR Update review and the design memoranda review conducted in 1989, based on problems identified with control of the FHB roll-up doors and the introduction of water into the containment spray piping resulting in an unanalyzed condition (seismic qualification basis included in a February 10, 1982, memorandum).

Response:

The FSAR Update and design memoranda review performed in 1989 was initiated as a corrective action for an event resulting from design information not being implemented into plant procedures and was intended to ensure that the design bases summarized in the FSAR Update were appropriately implemented in plant procedures. The review consisted of Engineering personnel reviewing and



highlighting the appropriate sections of the FSAR Update, and Plant Engineering then reviewing these against plant procedures and revising the procedures as appropriate. As discussed in the Licensee Event Report (LER) for this event, this expeditious review was not intended or designed to replace the broader scope of the longer term Configuration Management Program (CMP) design bases reconstitution and preparation of Design Criteria Memoranda (DCMs) discussed below and in previous correspondence with the NRC.

1. Control of the Roll-up Doors

PG&E reviewed the control of the FHB roll-up doors during the first two refueling outages. The roll-up doors were not procedurally controlled during the first two refueling outages. Operating Procedure (OP) B-8D, "Refueling Prerequisites," was revised on April 6, 1989, to control the roll-up doors during the Unit 1 third refueling outage. OP B-8H, "Non-Refueling Fuel Handling Instructions," was issued on December 9, 1989, to control these doors during non-refueling fuel movement activities. Reactor engineers and refueling senior operators were surveyed to determine if there were any known occurrences of the roll-up doors being open during fuel movement. It was determined from this survey that there were no known occurrences of the roll-up doors being open when fuel was being moved.

2. Introduction of Water into the Containment Spray Piping

The following is a summary of information presented in LER 1-84-043 regarding water being found in the Units 1 and 2 containment spray (CS) piping which resulted in an unanalyzed condition since the piping was seismically qualified with no water in the piping. On September 4, 1981, a Nonconformance Report (NCR) DCO-81-EN-N003 was issued to address concerns about an inconsistency between the assumptions used for the seismic analysis and containment pressure analysis. The NCR and related documents during the 1981-1982 timeframe (which included the February 10, 1982 memorandum regarding the containment spray piping) addressed the immediate concerns of the relative timing of the containment spray pump start and earthquake duration. No action was identified in the NCR which specifically required procedures to keep the piping empty during normal operation.

As indicated in the LER, PG&E concluded from a review of the available documentation that both Engineering and plant management were aware of the seismic analysis basis requirement to keep the containment spray lines dry. The LER concluded that the root cause was the failure to ensure that this CS piping water volume constraint was implemented in appropriate plant procedures when the procedures were prepared. The LER also concluded that there was no formal program in effect during this time period to communicate design basis information from Engineering to the plant or a programmatic system at the plant which would document design items for later incorporation into plant procedures and track those actions to completion.



LER 1-84-043 corrective actions included: (1) revision of the design basis memoranda procedure to include a section to specifically identify information in design and calculation bases which constitute plant operational constraints; and (2) review of Engineering NCRs from the construction period to identify any plant operational restraints which may have been involved with the NCRs to ensure that these restraints were appropriately incorporated into plant procedures.

The FSAR Update does not contain the level of detail that is contained in engineering calculations for the CS lines, and it was not expected that the expeditious FSAR Update and design memoranda review would identify issues at this level of detail. PG&E believes that the additional review of Engineering NCRs and revision of the DCM procedure to identify plant operational restraints, combined with the existing CMP, should provide adequate assurance that design bases information is appropriately incorporated into plant procedures.

3. Safety Analyses of FSAR Update Discrepancies

PG&E conducted a review of the DCPD FSAR Update to identify discrepancies between the FSAR Update and plant procedures. As a result of this review, 154 potential discrepancies were identified. Two NCRs were initiated to investigate and resolve these discrepancies. NCR DCO-89-TN-N081 was initiated for procedure discrepancies and NCR DCO-89-TN-015 was initiated for design discrepancies.

Administrative Procedure C-12, "Identification and Resolution of Problems and Nonconformances," requires that an Action Request (AR) be written for each identified problem. The 154 discrepancies were documented on individual ARs. Each AR requires an evaluation of reportability of the identified problem. All 154 ARs were evaluated for reportability by system engineers. The plant system engineers concluded that the design bases and/or operating parameters of the plant were not violated or compromised and that none of these discrepancies were reportable.

4. Adequacy of the FSAR and Design Memoranda Review

PG&E Letter DCL-89-206, dated August 4, 1989, indicated that an expeditious review of the FSAR Update was performed by plant system engineers and design system engineers to ensure that the design bases summarized in the FSAR Update were appropriately incorporated into plant operation, testing, and maintenance procedures. This letter indicated that no plant or system operability issues were identified. It also indicated that a more detailed review of the design bases implementation would be conducted as part of the CMP.

PG&E reviewed the adequacy of the FSAR Update and design memoranda review and concluded that, with the exception of the FHB doors, no operability or reportability problems were known to exist. Therefore, PG&E believes that the violation resulting from failure of an engineer to identify the personnel doors as part of the FHB boundary was an isolated case.



ENCLOSURE 2

CONCERNS REGARDING OCCURRENCES WHERE THE SIGNIFICANCE
OR SCOPE OF APPLICABILITY OF TECHNICAL ISSUES WERE APPARENTLY
INITIALLY NOT FULLY EVALUATED

NRC Concern:

The Inspection Report provided examples of occurrences where the significance or scope of applicability of technical issues were apparently initially not fully evaluated.

PG&E Response:

PG&E has reviewed the above concern and agrees that, while the occurrences of not fully thinking out technical issues had minimal safety significance, a more thorough initial investigation and followup process should have been conducted. Actions being taken by PG&E to ensure that plant personnel adequately evaluate the significance and scope of applicability of identified problems include:

1. Application of structured approaches to problem solving which clearly identify the: a) responsibility for problem ownership; b) initial investigation techniques; c) documentation of investigation plans; and d) timely initiation of meaningful corrective actions. These processes will be used as the initial input to the formal non-conformance and quality evaluation programs which provide rigorous root cause and corrective action plans but which are sometimes lengthy processes.
2. The Vice President - Operations will issue a memorandum on management expectations regarding prompt and thorough evaluation of problems and use of structured approaches to problem solving. Additionally, workshops will be conducted. These actions are being taken to ensure that PG&E management's expectations are understood by department managers, engineers, and general foremen.

