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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 50-275/90-16 & 50-323/90-16.

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

July 23, 1990

PG&E Letter No. DCL-90-190



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. 50-275/90-16 and 50-323/90-16

Gentlemen:

NRC Inspection Report Nos. 50-275/90-16 and 50-323/90-16 (Inspection Report), dated May 24, 1990, contained a Notice of Violation citing two Severity Level IV violations regarding maintenance activities on Limatorque motor-operated valves (MOV's). PG&E's response to the Notice of Violation is provided in the Enclosure. The Inspection Report also requested that PG&E discuss corrective actions to provide an adequate technical evaluation for the testing and maintenance of MOV's to assure their design basis operability. This area is being addressed extensively in PG&E's actions for Generic Letter 89-10 and is also addressed 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,

A handwritten signature in cursive script, appearing to read 'J. D. Shiffer'. The signature is written in dark ink on a white background.

J. D. Shiffer

cc: A. P. Hodgdon
J. B. Martin
P. P. Narbut
S. A. Richards
H. Rood
CPUC
Diablo Distribution
INPO

Enclosure

DCO-90-EM-N014

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ENCLOSURE

REPLY TO NOTICE OF VIOLATION IN NRC
INSPECTION REPORT NOS. 50-275/90-16 AND 50-323/90-16

On June 22, 1990, as part of NRC Inspection Report Nos. 50-275/90-16 and 50-323/90-16 (Inspection Report), NRC Region V issued a Notice of Violation citing two Severity Level IV violations for Diablo Canyon Power Plant (DCPP) Units 1 and 2. The statements of violation and PG&E's responses follow.

A. STATEMENT OF VIOLATION

10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures and Drawings, states, in part:

"Activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures or drawings..."

Nuclear Plant Administrative Procedure
NPAP-E-14/NPG-5.3, Supplier Documents and
Recommendations, states as follows, in part:

Paragraph 1.2: "Information covered by this procedure includes vendor bulletins, vendor information..."

Paragraph 4.1: "Supplier recommendations/documents within the scope of this procedure, when received by NPG organizations...or individuals, shall be forwarded to the Supervisor, PSG."

Contrary to the above, Limatorque Maintenance Update 89-1, when received by individual licensee employees from Limatorque on or about December 22, 1989, was not forwarded to the Supervisor, PSG. In addition Limatorque Maintenance Update, dated August 1988 had been received from the vendor by an individual licensee employee but had not been forwarded to the Supervisor, PSG, as of May 25, 1990.

This is a Severity Level IV violation (Supplement 1).

REASON FOR THE VIOLATION IF ADMITTED

PG&E concurs that plant personnel failed to follow administrative requirements in NPAP E-14 regarding control and technical evaluation of information received from Limatorque. PG&E's review concluded that this failure to forward vendor information to the Supervisor, PSG, in accordance with NPAP E-14 was due to lack of familiarization with NPAP E-14 requirements.



CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

PG&E has reviewed the subject vendor maintenance update information to determine if the information had been appropriately incorporated into the maintenance program. This review determined that all appropriate information had been incorporated into the DCPD maintenance program prior to the NRC inspection.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The requirements of NPAP E-14 will be reemphasized to all appropriate personnel. Training on the requirements of NPAP E-14 will be incorporated into the ongoing maintenance training program to ensure that maintenance personnel receive periodic refresher training concerning the proper methods for receipt and incorporation of vendor information.

PG&E will also submit written requests to all of its suppliers listed on the Qualified Suppliers List that all future correspondence regarding vendor technical information shall be directed to the appropriate responsible organization. In addition, a standard clause will be added to all future purchase orders stating the this requirement.

The Limitorque vendor manual update is within the portion of Vendor Manual Review Program which will be completed by the end of 1990. This program consists of performing both a Nuclear Engineering and Construction Services (NECS) and DCPD technical review, contacting the vendor, and reissuing the manual in an updated format as a controlled document.

Further, PG&E as a result of its Vendor Manual Review Program has reviewed its vendor contact program and identified potential enhancements. These enhancements are being finalized and will be described as part of PG&E's response to Generic Letter 90-03.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is in full compliance with administration procedures in that the Limitorque information is appropriately incorporated into PG&E's maintenance program. All actions to enhance handling of vendor material and prevent recurrence are targeted for completion of the end of 1990.

B. STATEMENT OF VIOLATION

10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures and Drawings, states, in part:

"Activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings..."



Nuclear Plant Administrative procedure NPAP C-12, Rev: 19, Identification and Resolution of Problems and Nonconformances, Paragraph 5.4.1.a, states, in part:

"A Quality Evaluation is required for any of the following situations in which the quality of an item or activity is determined to be unacceptable or indeterminate.

1. An item will not perform its intended safety function or no longer meets its design requirements such as seismic or environmental qualification requirements.
2. There is a question whether an item will perform its intended safety function or meet design requirements."

Contrary to the above, at the time of the inspection, a Quality Evaluation had not been performed on spring pack deficiencies in Limatorque actuators of four safety-related valves identified in Request Nos. A0126108, A0126109, A0126110, A0125730 dated October 1988. The deficient condition raised the question of whether the items would perform their intended safety function or meet design requirements.

This is a Severity Level IV violation (Supplement 1).

REASON FOR THE VIOLATION IF ADMITTED

PG&E does not believe that inappropriate action was taken or that a violation of procedures occurred regarding the assessment of spring pack deficiencies.

During the Unit 2 second refueling outage in the fall of 1988, PG&E identified a problem with four SMB-00 spring packs. In all four cases the craftsman identified the problem as a "collapsed" spring pack and documented this on Action Requests (ARs). In three cases the craftsman had noted that the spring pack thrust washer could be rotated by hand and had interpreted this as a sign of potential relaxation and replaced the spring pack. In the fourth case, the craftsman identified the spring pack as "collapsed" because different gap measurements were observed around the perimeter of the thrust washer. The gap difference between 0 degrees and 180 degrees was 0.004 inches. The craftsman also interpreted this as a sign of potential relaxation and replaced the spring pack. An investigation of these ARs was conducted by the PG&E maintenance engineer cognizant in Limatorque valve operators who determined that the actions taken were conservative. The ability to rotate a thrust washer by hand may be indicative of a spring pack relaxation problem. PG&E has found that, dependent upon the factory set preload of certain SMB-00 spring packs the thrust washer can be rotated by hand on a new, fully loaded spring pack. The gap difference is also normal for a new, fully loaded spring pack and does not necessarily indicate a degraded condition.



In all four cases the maintenance engineer made the decision that the spring packs had been operable and that the actuators would have performed satisfactorily before maintenance. This evaluation was supported by the successful performance of surveillance testing. In addition, for AR A0125730, the maintenance engineer's evaluation concluded that the valve operator was fully functional prior to maintenance as demonstrated by load cell testing approximately sixteen months earlier.

The evaluation of the four cases of spring pack relaxation occurred before the Limatorque "Notes from the Field" were issued addressing possible spring pack relaxation. No manufacturer's maintenance information existed prior to the identification of these cases and, therefore, there was no reason to consider these observed spring pack differences as more than a preventive maintenance task and normal wear and tear.

As a result of manufacturer information which was published subsequent to these four cases, if similar spring pack conditions should occur they would result in issuance of a Quality Evaluation. In retrospect, PG&E believes that initiation of a Quality Evaluation would have better documented evaluation of the problems noted in the subject ARs. However, considering the information available at the time of identification of these four cases, and the associated successful pre-maintenance and/or post-maintenance surveillance testing, it is PG&E's position that the maintenance engineer made the correct judgement in the determination that actuator operability was not compromised and that a Quality Evaluation was not required. Based on the information provided by the PG&E maintenance engineer cognizant in Limatorque valve operators, Quality Control concurred in the decision that no Quality Evaluation was required. Also, as noted in the Inspection Report, an observed significant strength involved PG&E's identification of a potential generic deficiency.

ACTIONS TAKEN TO IMPROVE PERFORMANCE

Even though PG&E believes that the maintenance engineering evaluation of the problem as a non-quality problem was appropriate, the following actions have been taken since the time when the subject ARs were initiated that should further enhance evaluation of maintenance problems:

1. Plant management recognized the need for increased management attention in the electrical maintenance area and created a new Electrical Maintenance Manager position in March 1990.
2. The new Electrical Maintenance Manager has emphasized problem identification, elevating problems to the appropriate management attention, preservation of equipment problem evidence, troubleshooting techniques, and root-cause analysis in staff and department meetings.
3. In addition, the Assistant Plant Manager - Maintenance has also emphasized problem identification and initiation of the appropriate quality documentation, i.e., QE or NCR.



ADDITIONAL INFORMATION REQUESTED

The Inspection Report also requested that PG&E discuss corrective actions to provide an adequate technical evaluation for the testing and maintenance of MOVs to assure their design basis operability.

In addition to the above actions to address the specific violations, PG&E has recently developed a program plan in accordance with Generic Letter 89-10 to verify by design basis review and testing the capability of the installed safety-related valves to perform their intended design function. The program includes enhanced testing and maintenance activities for the Diablo Canyon MOVs. The enhanced maintenance will include "as found" MOV diagnostics on a sampling basis as a minimum. Equipment procurement is in progress and the first set of "as found" data will be taken during the next refueling outage for each unit. This program plan was jointly developed by engineering and plant personnel and is currently being implemented, with full implementation targeted by June 1994.

Major action for this program are summarized below.

- Identify all motor operated valves and which valves are to be excluded from further review.
- Establish the maximum differential pressure based on accident analysis and operating procedures.
- Compare the valve design differential to the identified design value to establish capability.
- Based on the maximum differential pressure recalculate required setting for the motor operator.
- Perform differential pressure testing for all of the motor operated valves.
- Develop a program to control the setpoints for each valve.
- Develop a predictive/preventive maintenance program for each valve.
- Develop an enhanced surveillance program for motor operated valves.

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