

## NOTICE OF VIOLATION

Pacific Gas and Electric  
Diablo Canyon  
Units 1 and 2

Docket Nos. 50-275 and 50-323  
License Number DPR-80 and DPR-82

During an NRC inspection conducted on April 22 through May 24, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V, requires in part that instructions, procedures or drawings include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Technical Specification (TS) 6.8.1 incorporating Regulatory Guide (RG) 1.33, Revision 2, Appendix A paragraph 8.b require that specific procedures for surveillance tests be written to implement TS surveillance requirements.

Contrary to the above:

1. The acceptance criteria of Revision 3 of surveillance test procedure M-9I, "Diesel Generator Start Validity," did not include a maximum time limit for starting and loading the Emergency Diesel Generator to the bus, within rated speed, voltage, and frequency, as required by TS surveillance requirement 4.8.1.1.2.a.
2. The acceptance criteria contained in surveillance procedure No. STP V 302, Revision 1, for emergency diesel generator air start system check valve/system leakage of 30 psig in 10 seconds, was not appropriate in that it did not ensure 45 seconds of continuous engine cranking, as specified in FSAR 8.3.1.1.13.2, with the leakage allowed, and still be capable of starting the Emergency Diesel Generators to rated speed, voltage, and frequency and load within 10 seconds.

This is a Severity Level IV Violation (Supplement I).

- B. TS 4.8.1.1.2.a requires, in part, that EDG starts be verified by the EDG accelerating to at least 900 RPM in less than or equal to 10 seconds, and EDG voltage and frequency be 4160 + or - 420 volts and 60 + or - 1.2 HZ within 13 seconds after the start signal. TS 4.8.1.1.2.a also requires, in part, that EDG testing frequency be in accordance with TS Table 4.8-1. TS Table 4.8-1 requires EDG testing frequency that is dependent on the number of valid tests and test failures. TS Table 4.8-1 requires that the criteria for determining the number of valid tests and failures be in accordance with Position C.2.e of Regulatory Guide (RG) 1.108, Revision 1. RG 1.108, Revision 1, defines "Failure" as the failure to start, accelerate, and assume the design rated load within the time prescribed during an emergency or valid test. Position C.2.e of RG 1.108, Revision 1, requires in part that all start attempts that result in failure to



start and load, be considered valid tests and failures unless the failure can be definitely attributed to a malfunction of equipment that is not a part of the defined EDG unit design.

Contrary to the above, an EDG 1-1 start on March 7, 1991, during a loss of offsite power event, took approximately 19.8 seconds to accelerate to rated speed, voltage and frequency, and assume its load, and was determined by the licensee to be an invalid failure, although the cause had not been definitely determined.

This is a Severity Level IV Violation (Supplement I)..

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC, 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector, Diablo Canyon, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation, or, if contested, the basis for disputing the violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

Dated at Walnut Creek, California  
this 1<sup>st</sup> day of July, 1991

