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 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323

AUTH. NAME AUTHOR AFFILIATION
 RUEGER, G.M. Pacific Gas & Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-275/92-22 & 50-323/92-22. Corrective actions: PMT 21-06, "DG 2-3 Engine Fuel Oil Sys Operational Test" revised to include specific criteria in Section 6.0, "Acceptance Criteria."

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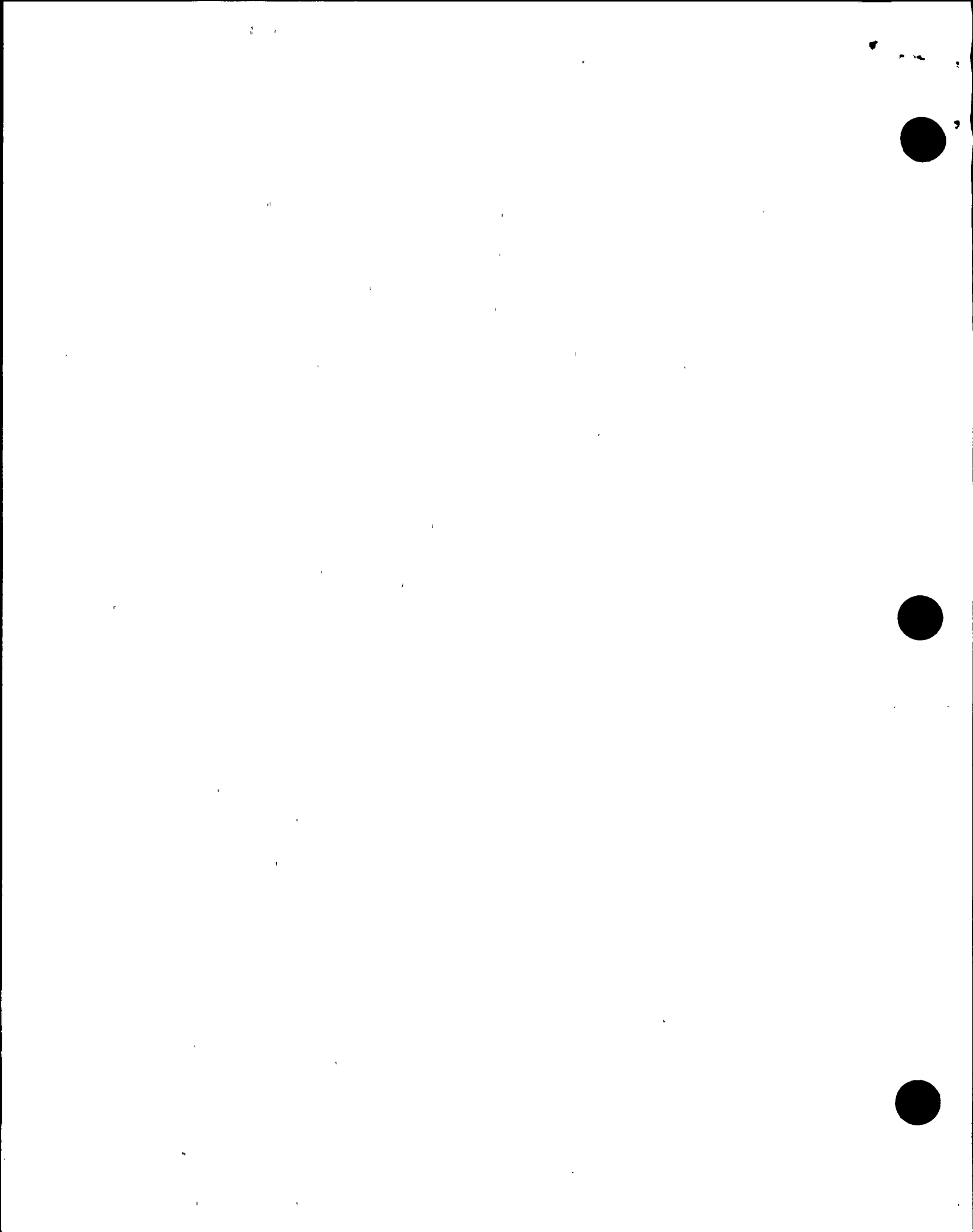
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Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

October 22, 1992

PG&E Letter No. DCL-92-233



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 50-275/92-22
and 50-323/92-22

Gentlemen:

NRC Inspection Report 50-275/92-22 and 50-323/92-22, dated September 25, 1992, cited a Severity Level IV Violation regarding an inadequate test procedure used for installation testing of the sixth emergency diesel generator (EDG 2-3). PG&E's response to the Notice of Violation is enclosed.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Gregory M. Rueger'.

Gregory M. Rueger

cc: Ann P. Hodgdon
John B. Martin
Philip J. Morrill
Harry Rood
CPUC
Diablo Distribution

DC2-92-TP-N048

Enclosure

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ENCLOSURE

**REPLY TO NOTICE OF VIOLATION IN
NRC INSPECTION REPORT 50-275/92-22 AND 50-323/92-22**

On September 25, 1992, as part of NRC Inspection Report 50-275/92-22 and 50-323/92-22, NRC Region V issued a Notice of Violation citing one Severity Level IV violation for Diablo Canyon Power Plant (DCPP) Units 1 and 2. The statement of violation and PG&E's response follow.

STATEMENT OF VIOLATION

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures and Drawings, states, in part, "...Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished."

Diablo Canyon Quality Assurance Procedure QAP-5.A, Revision 3/16/89, "Instructions, Procedures, and Drawings," Paragraph 4.4.9, states:

Acceptance Criteria - For procedures covering tests or inspections, acceptance criteria shall be specified. The criteria shall either be quantitative, such as dimensions and tolerances, or qualitative, such as comparative workmanship samples.

Contrary to the above, as of August 21, 1992, no acceptance criteria were included in the test procedure PMT 21.06, Revision 1, for preoperational testing of the fuel oil system for emergency diesel generator 2-3. The test procedure verified safety related level switch setpoints for the fuel oil day tank.

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

REASON FOR THE VIOLATION

PG&E acknowledges the violation as stated in the inspection report.

On August 4, 1992, post-modification test procedure PMT 21.06, "Diesel Generator 2-3 Engine Fuel Oil System Operational Test," Revision 1, was approved, and on August 10, 1992, it was issued for use. The scope of the procedure included verifying emergency diesel generator (EDG) 2-3 fuel oil day tank level switch setpoints, level indicator calibration, and the function of the magnetic priming and hand pumps.

Administrative procedure AD1.DC18, "Writer's Guide for PMT Procedures," provides guidance that the acceptance criteria section of PMT procedures should clearly and unambiguously state what performance indicators must be verified, and also states that the instructions section should directly address both quantitative and qualitative acceptance criteria. The guidance



for Section 12.0, "Data Reduction and Evaluation," states that "if the test does not have acceptance criteria, it will be so stated in this section."

Contrary to this guidance, Section 6.0 of the test procedure, titled "Acceptance Criteria," listed "None." This section should have either listed specific acceptance criteria or stated that successful completion of all the procedure steps as prescribed constituted acceptable performance of the components. However, the expected nominal values for measurements were noted within the body of the test procedure instructions, and one of the final steps in the procedure was to check that "all steps in the procedure have been successfully completed as prescribed."

PG&E's investigation of this event has determined that throughout the preparation and review process for PMT 21.06, it was understood that acceptable performance of the equipment would be demonstrated in the instructions section of the procedure, and by the test director's verification in Section 12.0 that all steps of the procedure were completed as prescribed. PMT 21.06 Revision 1 was not completed as written. In addition, further testing of the setpoints would have been performed prior to declaring the system operable. This event can be categorized as a procedural error requiring correction and does not constitute a breakdown in the DCPP Quality Assurance Program.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

PMT 21.06 was revised to include specific acceptance criteria in Section 6.0, and the test was completed satisfactorily using the revised procedure. In addition, a tailboard was held with PMT procedure writers detailing the importance of specifying either quantitative or qualitative acceptance criteria in Section 6.0 of PMT procedures.

A review of DCPP's current PMT procedures indicates that no quality-related PMT procedures contain an acceptance criteria of "None." Several procedures contained acceptance criteria which stated that successful completion of all steps of the procedure demonstrates acceptable performance of the equipment.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The PMT procedure writer's guide, AD1.DC18, will be revised to clearly state that either quantitative or qualitative acceptance criteria shall be specified for all PMT procedures. In addition, a checklist summarizing procedural requirements will be incorporated into the writer's guide to aid in the preparation and review of PMT procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is presently in full compliance. AD1.DC18 will be revised by January 31, 1993.

