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June 22, 1993

PG&E Letter No. DCL-93-157

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 Enforcement Conference Reports  
50-275/93-14 and 50-323/93-14

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Gentlemen:

NRC Enforcement Conference Reports 50-275/93-14 and 50-323/93-14, dated May 25, 1993, contained a Notice of Violation citing two Severity Level IV violations regarding: (1) failure to implement and maintain a program that ensures the capability to obtain and analyze reactor coolant samples and samples of radioiodines and particulates in plant gaseous effluents under accident conditions; and (2) failure to perform a written safety evaluation for changes to facilities and procedures for post-accident sampling and analysis of reactor coolant dissolved hydrogen. PG&E's response to the Notice of Violation is provided in the enclosure.

Sincerely,

Gregory M. Rueger

cc: Bobby H. Faulkenberry  
Ann P. Hodgdon  
Mary H. Miller  
Sheri R. Peterson  
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Diablo Distribution

DCO-93-TC-N020  
LER 1-93-007-00

Enclosure

1131S/85K/EWC/2237

-9306290282



## ENCLOSURE

REPLY TO NOTICE OF VIOLATION IN  
NRC ENFORCEMENT CONFERENCE REPORT 50-275/93-14 AND 50-323/93-14

On May 25, 1993, as part of NRC Enforcement Conference Reports 50-275/93-14 and 50-323/93-14, NRC Region V issued a Notice of Violation citing two Severity Level IV violations for Diablo Canyon Power Plant Units 1 and 2. The statements of violation and PG&E's responses follow.

## STATEMENT OF VIOLATION A

TS 6.8.4 requires in part that the licensee establish, implement, and maintain a program which will ensure the capability to obtain and analyze reactor coolant samples and samples of radioiodines and particulates in plant gaseous effluents under accident conditions. The program must include the following: (1) training of personnel, (2) procedures for sampling and analysis, and (3) provisions for maintenance of sampling and analysis equipment.

Contrary to the above:

1. During the periods of August 24 - October 15, 1992, November 6 - December 10, 1992, December 31, 1992 - February 12, 1993, and February 25, 1993 - April 6, 1993, the licensee failed to implement and maintain a program in Unit 2 which ensured the capability to obtain and analyze reactor coolant samples under accident conditions, in that:
  - (a) the principal means of quantifying reactor coolant dissolved hydrogen, using an in-line exosensor, was inoperable during these periods;
  - (b) the licensee had discontinued training, procedures, and calibration for quantifying reactor coolant dissolved hydrogen with the SENTRY gas chromatograph; and
  - (c) the licensee's remaining alternate methods of quantifying reactor coolant dissolved hydrogen (i.e., liquid grab samples analyzed by normal laboratory methods) could not be used, under accident conditions resulting from a major loss of coolant accident with core damage, without exposing individuals to a prohibitive dose.
2. As of March 9, 1993, the licensee had failed to implement a program which ensured the capability to obtain and analyze samples of radioiodines and particulates in plant gaseous effluents under accident conditions, in that: (1) the licensee's program relied primarily on RE-32, a monitor which could not have obtained the required samples under certain accident conditions (i.e., a loss of coolant accident with major core damage), and (2) for RX-40, the



only sampler capable of obtaining the required samples under certain accident conditions, the licensee's program did not include provisions to ensure that the monitor would not be left out of service for excessive periods.

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

#### REASON FOR THE VIOLATION

PG&E agrees that Technical Specification (TS) 6.8.4.e, "Post-Accident Sampling," was not met when the Sentry remote grab sample gas chromatograph method (GC method) was discontinued at a time when the in-line reactor coolant dissolved hydrogen monitor was inoperable. PG&E also agrees that its program for sampling and analysis of plant vent radioiodines and particulates did not adequately control the availability of RX-40, the plant vent high range radioiodine and particulate sampler. However, this inadequate procedural control of RX-40 availability did not result in RX-40 in fact being out of service for an excessive period.

The root cause of the violation related to post-accident sampling of reactor coolant dissolved hydrogen was determined to be personnel error, in that non-licensed plant personnel did not adequately review the licensing requirements in NUREG-0737 for the post-accident sampling system (PASS) prior to discontinuing reliance on the GC method. As a result, the GC method was discontinued at a time when it was required by NUREG-0737 to be available as a backup to the inoperable primary method, the in-line hydrogen monitor.

The root cause of the violation related to post-accident sampling of radioiodines and particulates was determined to be a procedural inadequacy in PG&E's Equipment Control Guideline (ECG) 11.1, "Post-Accident Sampling System." ECG 11.1 inadequately controlled RX-40 allowed outage time and incorrectly relied on RE-32, the plant vent midrange radioiodine and particulate sampler, as the primary sampler.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The GC method for reactor coolant dissolved hydrogen analysis has been reinstated and made operable on both units.

ECG 11.1 was revised to clarify which alternate methods of analysis do not meet 10 CFR 50 Appendix A General Design Criterion (GDC) 19. Surveillance Test Procedure (STP) G-14, "Operability Determination of Post-Accident Sampling Program," was revised to add a precaution to evaluate prospective dose prior to taking a sample in the event that a decision is made to use one of the non-qualified GDC 19 backup methods under accident conditions. ECG 11.1 was also revised to include RF-87A or RF-87B, the new plant vent high range radioiodine and particulate samplers, or RX-40 as the primary samplers for radioiodines and particulates under accident conditions. It should be noted that this is an interim configuration and RX-40 may be removed from service in the future.

Emergency Procedure (EP) RB-12, "Mid and High Range Plant Vent Radiation Monitors," was revised to include the use of RF-87A and RF-87B.



### **CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS**

The calibration procedure (Loop Test 11-1109B, "Post-LOCA Sampling System Dissolved Hydrogen Channel ANI-1109 Calibration") will be revised to ensure proper alignment of the in-line sensor inlet and the sample inlet probe during maintenance.

A comprehensive review of PASS GDC 19 dose limit requirements will be conducted. The scope of this review is to identify in-line monitors for which backup methods are required by NUREG-0737, to assure that such methods meet GDC 19.

### **DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

PG&E is currently in full compliance. Corrective actions are scheduled for completion by July 30, 1993.





## STATEMENT OF VIOLATION B

10 CFR 50.59 requires in part that the licensee maintain records of changes to the facility or procedures described in the Updated Final Safety Analysis Report (UFSAR), including a written safety evaluation that provides the basis for determining that the change does not involve an unreviewed safety question.

The UFSAR for Units 1 and 2, Section 9.3.2.2, "Post-LOCA Sampling System," describes the licensee's facilities and procedures for obtaining prompt remote samples of reactor coolant under accident conditions, including the system capability for quantifying reactor coolant dissolved hydrogen using the chemical analysis panel.

Contrary to the above, as of April 9, 1993, the licensee had not maintained records of a change to the facility as described in UFSAR Section 9.3.2.2, in that, on August 18, 1992, procedures and calibration were discontinued for quantifying reactor coolant dissolved hydrogen at the chemical analysis panel, and no written safety evaluation of this change was performed for either Unit 1 or 2.

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

## REASON FOR THE VIOLATION

A safety evaluation screen was performed prior to the discontinuation of the GC method of sampling and analyzing post-accident dissolved hydrogen. However, PG&E agrees that a written safety evaluation should have been performed.

The root cause for the failure to perform a written safety evaluation was determined to be personnel error, in that non-licensed plant personnel did not adequately review the licensing requirements in NUREG-0737 for the PASS.

## CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The GC method for reactor coolant dissolved hydrogen analysis has been reinstated and made operable on both units.

## CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A comprehensive review of PASS GDC 19 dose limit requirements will be conducted. The scope of this review is to identify in-line monitors for which backup methods are required by NUREG-0737, to assure that such methods meet GDC 19.

A basis file for NUREG-0737 requirements for STP G-14 will be created and required to be reviewed prior to revision of STP G-14, ECGs containing PASS parameters, EP RB-12, and procedures controlled by EP RB-15, "Post-Accident Sampling System."



**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

PG&E is currently in full compliance. Corrective actions are scheduled for completion by July 30, 1993.

