

Attachment to GAP #314.08.03  
Reference: NRC Inspection Report Nos.  
50-275/84-11 & 50-323/  
84-11  
Dated: July 13, 1984  
Page 5 of 9

U.S. NUCLEAR REGULATORY COMMISSION  
REGION V

Report No. 50-275/84-11  
50-323/84-11

Docket No. 50-275  
50-323

License No. DPR-76

Construction Permit No. CPPR-69

Licensee: Pacific Gas and Electric Company  
77 Beale Street, Room 1435  
San Francisco, California 94106

Facility Name: Diablo Canyon Unit 1 and Unit 2

Inspection at: Diablo Canyon Site, San Luis Obispo County, California

Inspection conducted: May 14-25, 1984

Inspectors:

Harvey L. Carter

H. L. Carter, Chief, Engineering Section

July 5, 1984

Date Signed

Kenneth D. Ivey Jr.

K. D. Ivey, Jr., Reactor Inspector

July 5, 1984

Date Signed

C. J. Myers

C. J. Myers, Reactor Inspector

7-5-84

Date Signed

W. J. Wagner

W. J. Wagner, Reactor Inspector

7-5-84

Date Signed

J. F. Burdoon

J. F. Burdoon, Reactor Inspector

7-5-84

Date Signed

P. Morrill

P. Morrill, Reactor Inspector

7-5-84

Date Signed

P. Qualls

P. Qualls, Reactor Inspector

7-5-84

Date Signed

C. Clark

C. Clark, Reactor Inspector

7/5/84

Date Signed

T. Crowley

T. Crowley, Reactor Inspector

7/5/84

Date Signed

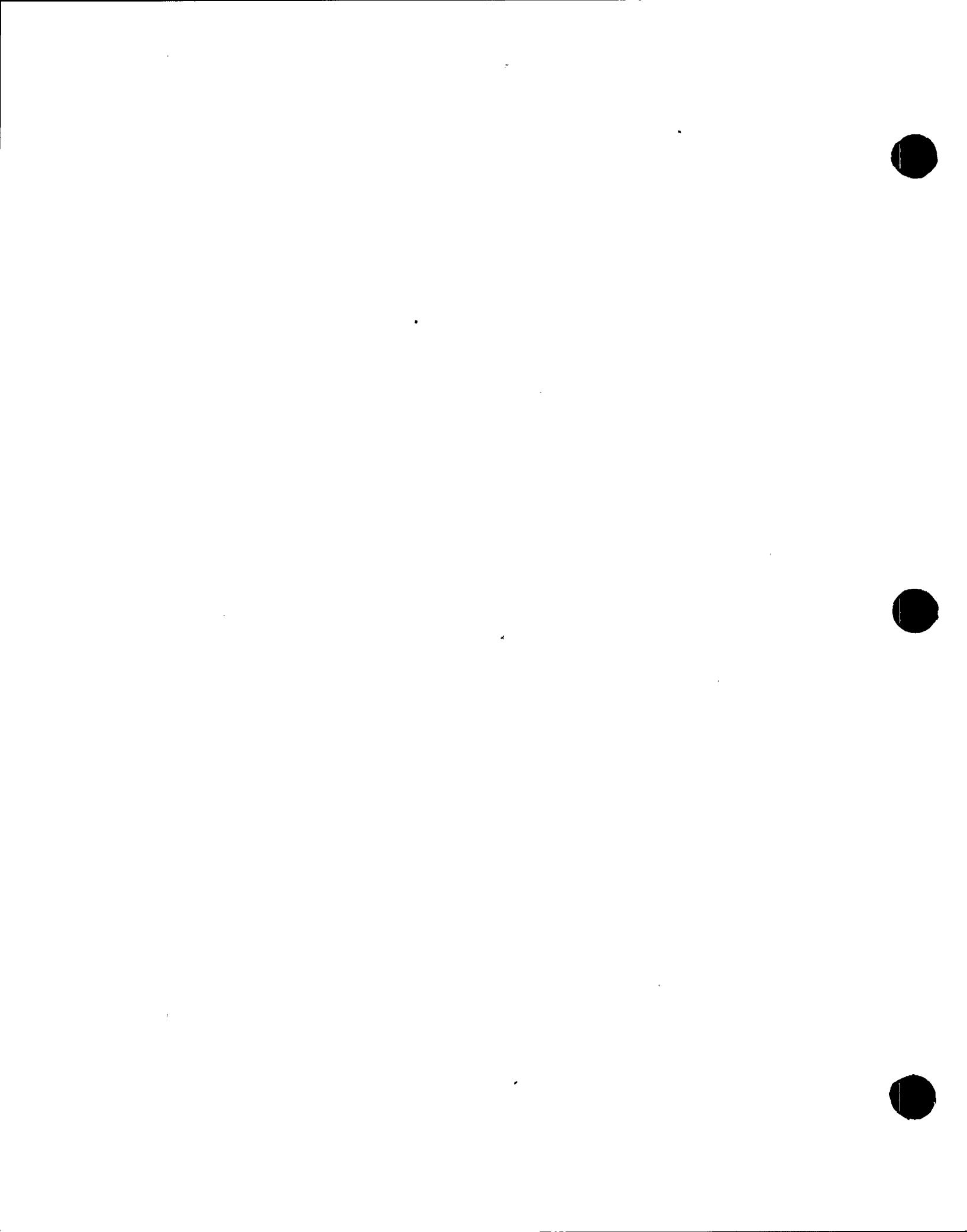
Approved by:

D. F. Kirsch  
D. F. Kirsch, Chief  
Reactor Projects Branch

7/8/84

Date Signed

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Summary:

Inspection during period of May 14-25, 1984 (Report No. 50-275/84-11 and  
50-323/84-11)

Areas Inspected: A special, unannounced inspection by regional based inspectors of items that require evaluation prior to the plant being allowed to exceed 5% of rated power, followup on an item of noncompliance, and followup on various other allegations.

The inspection involved 523 inspection hours by nine inspectors.

Results: No items of noncompliance or deviations were identified.

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Staff inquired as to whether any written statements had been obtained from the above two men, and was told that at this time there were no plans to obtain written statements.

d. STAFF POSITION

- 1) The allegation appears to be one training session participant's interpretation, which was not experienced by other participants interviewed by staff.
- 2) Based on training material provided and staff interviews, Bechtel's training session appears to have been handled in a responsible manner.

e. Action Required

None.

No violations or deviations were identified.

8. UNMARKED TOOLS (ALLEGATION NO. 278) CLOSED

This allegation dealt with a Pullman QC Manager who allegedly unsatisfactorily dispositioned a DCN (Design Change Notice) on unmarked tools used on stainless steel.

The licensee responded to this allegation in a May 29, 1984 PG&E letter (DCL-84-195). The staff examined this response and concluded that it appropriately addresses this issue. Therefore Allegation 278 is CLOSED.

No violations or deviations were identified.

9. HOLD TAG REMOVAL (ALLEGATION NO. 279) (CLOSED)

a. CHARACTERIZATION

Management would not permit a QC inspector to temporarily halt work which he observed being performed using improper tools.

b. IMPLIED SIGNIFICANCE TO DESIGN, CONSTRUCTION OR OPERATION

QC inspectors must have sufficient organizational freedom, including sufficient independence from cost and scheduling when opposed to safety considerations, to identify quality problems.

c. ASSESSMENT OF SAFETY SIGNIFICANCE

1) Background

The incident involving use of improper tools on stainless steel work was supplied to the NRC by an anonymous aleger. The NRC numbered this as Allegation No. 278. Allegation 278 states in part that when the QC inspector put a Hold Tag on stainless

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steel work because the workers were using tools that did not have the special markings required for tools used on stainless steel, his leadman ordered him to remove the Hold Tag. In Attachment (L) of the PG&E response to Allegation 278, dated 3/19/84 to the Joint Intervenor's Motion, the licensee stated that the QC inspector had initiated a Deficient Condition Notice and hung a hold tag to stop work which he did not consider to be performed with proper tool control. His leadman investigated the circumstances of the incident, determined that no QA/QC violation had occurred and, directed the QC inspector to remove the hold tag since the DCN had been prepared without adequate investigation.

2) Current Examination Effort

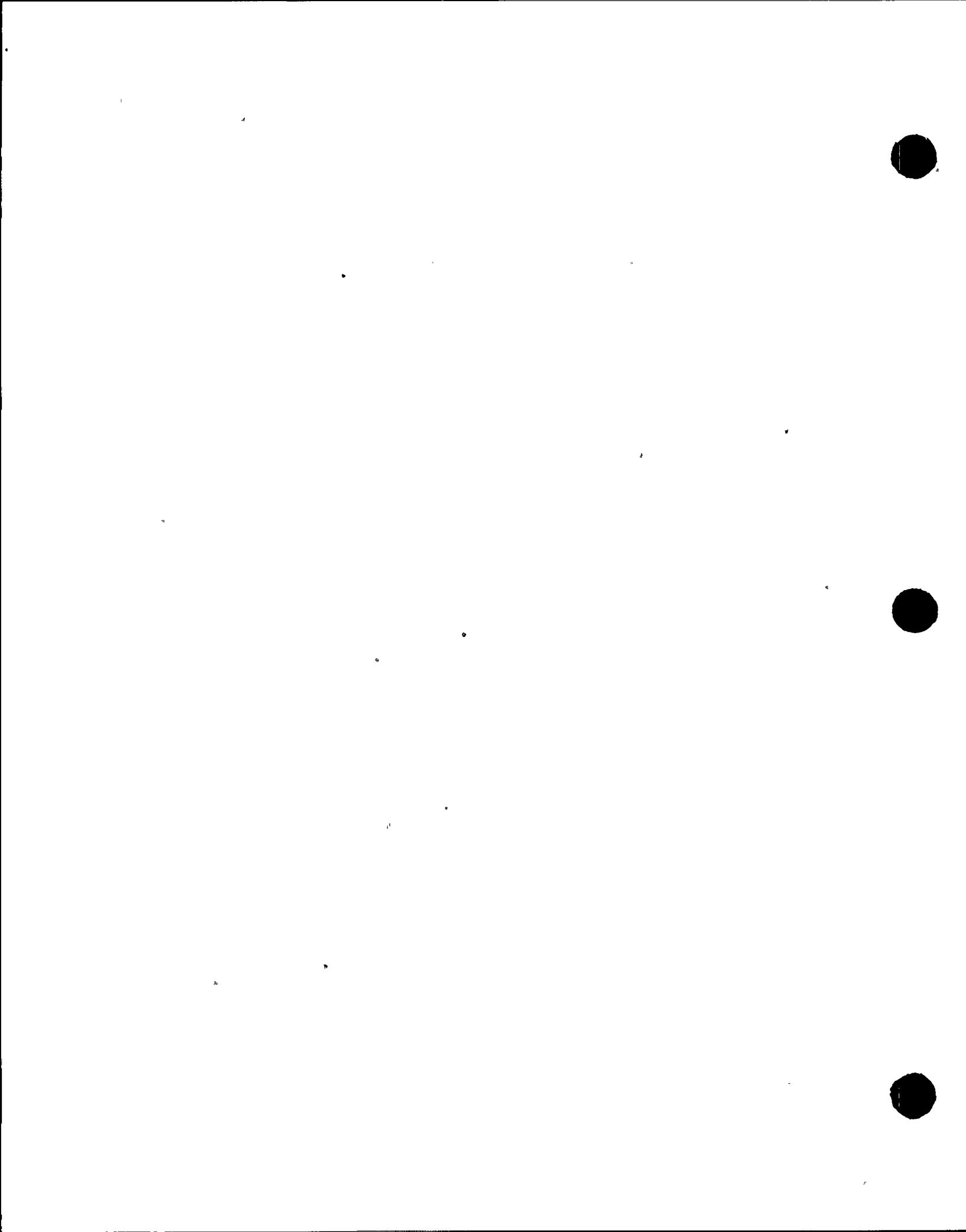
The staff examined the Pullman documents listed below, and interviewed responsible licensee Quality Assurance personnel. In addition, interviews were conducted with available crafts personnel involved in the subject incident in order to validate the allegations.

- General Field Support Process Sheet, Support #50-23R
- The Deficient Condition Notice, referred to above
- Field Procedure for Deficient Condition Notices, ESD-268
- Nonconformities, KFP-10
- Affidavit of H. W. Karner, P. Dawson, Attachment (L) of PG&E response of 3/19/84 to Joint Intervenor's Motion
- Stainless Steel Tool Control, ESD-228
- Field Weld Process Sheet Nos. X225, A4411, X223A, X223B
- Discrepancy Report No. 4411

Pullman Deficient Condition Notice procedure ESD-268 requires a QA/QC inspector to report all discrepant items on a Deficient Condition Notice and affix a hold tag to the item until the notice has been dispositioned.

The staff determined that the QC inspector was directed to remove the hold tag which he had hung on work which he considered to have been performed in violation of stainless steel tool control ESD-228. The hold tag was intended to stop stainless steel work, but, the hold tag actually stopped work in progress on carbon steel pipe hanger supports also. After supervisory investigation of the circumstances of the hold tag, the direction was given to the QC inspector by his management to remove the hold tag, based on evaluation of the inappropriateness of the resulting work stoppage. Supervisors also determined that there was inadequate basis for identification of the discrepancy itself since the QC inspector had not observed the use of unmarked tools during previous stainless steel pipe welding.

As a result of the current inspection activity, the staff found that the circumstances surrounding the placing and removal of the hold tag were vague, and that there was no basis for



concluding that Pullman management covered up serious quality problems. The DCN resulting from the incident documented the inspector's quality concerns and, although delayed, was dispositioned and resolved.

Subsequent revision of the Pullman nonconformance reporting procedure, KFP-10, has clarified supervisory control of the necessity for placing hold tags to further insure that QC inspectors are independent of production pressures in reporting deficiencies.

d. STAFF POSITION

The staff concludes that the hold tag was improperly placed on the work, in that it was intended to stop stainless steel work, but, in actuality, stopped all work in the area. The directed removal of the tag is understandable in this case. The lack of clarity in the related procedure contributed to the confusion in this case. Subsequent to this instance, the licensee amended the nonconformance reporting procedure to clarify management control regarding the necessity for hold tag placement. The staff considers this amended procedure to comply with 10 CFR 50, Appendix B.

e. ACTION REQUIRED

None

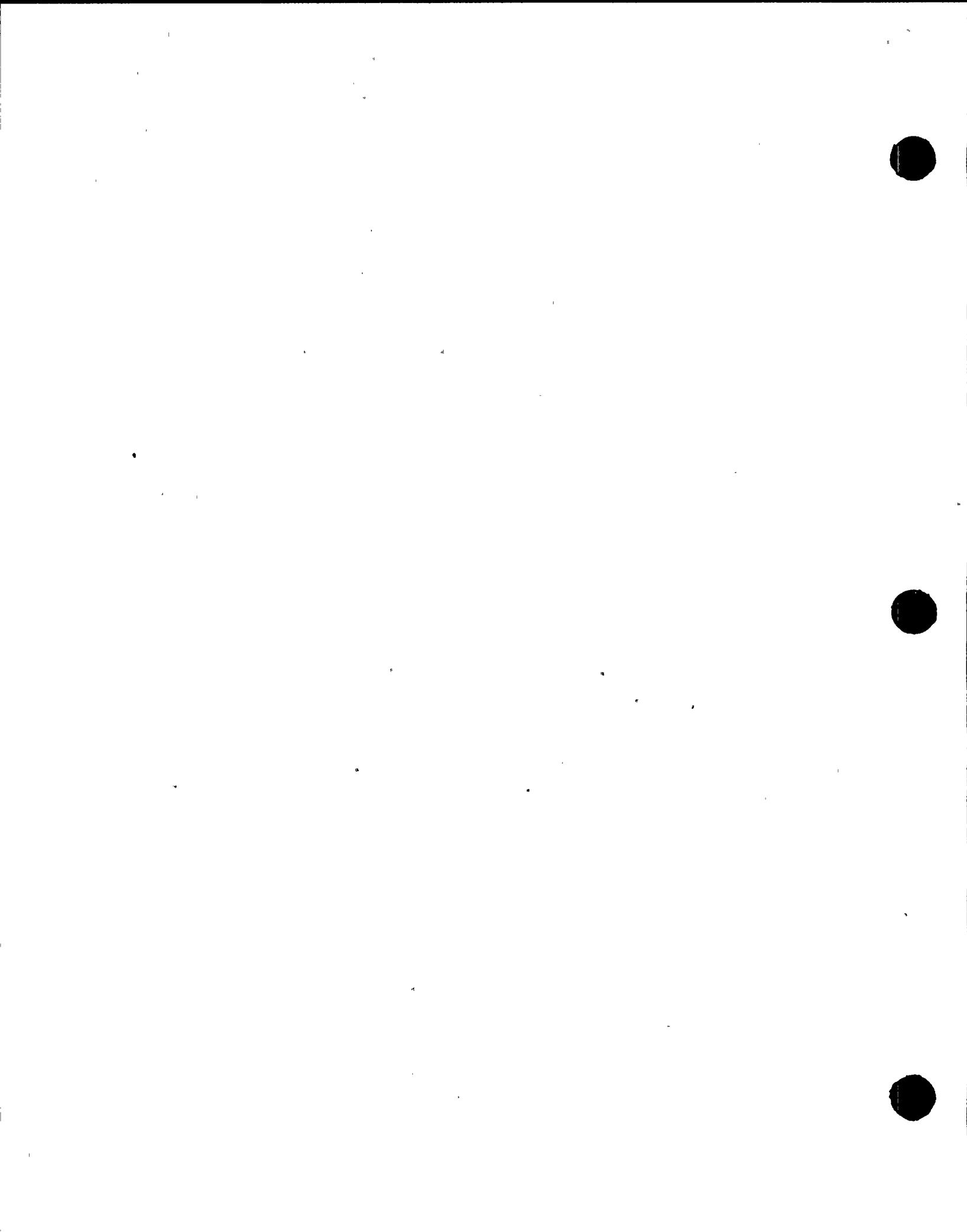
No violations or deviations were identified.

10. EXAMINATION OF OPERATING VALVE IDENTIFICATION DIAGRAMS (OVIDS) AND PIPING AND INSTRUMENT DIAGRAMS (P&IDS) (ALLEGATION NOS. 34, 61, 61a, 102, 334, 335, AND 336) (CLOSED)

a. CHARACTERIZATION

The alleger stated that "the Nuclear Plant Operations (NPO) group uses drawings known as Operational Valve Identification Diagrams (OVIDs) to run and assess the condition of the plant" and "that these drawings did not match the approved design drawings, known as Piping and Instrumentation Diagrams (P&ID)" [Allegation #334]. The alleger went on to state that "the flow sequence was so far off that the two versions of drawings had valves on different sides of the check valves. This discrepancy could lead to false readings for the operators about the flow of liquid in the system [Allegation #334]. --- In other cases the OVIDs that will be relied on by the operators are incomplete. An example of the missing information includes valve numbers, which are used to obtain line 'clearances' (sic.) [Allegation #335]. --- When the above issues were raised in a problem report management verbally killed the issue. [Allegation #336].

Related Allegations (Nos. 34, 61, 61a, and 102 in SSER 21 and 22) also indicated possible lack of control of as-built drawings, design change notices, and design drawings. These allegations were left

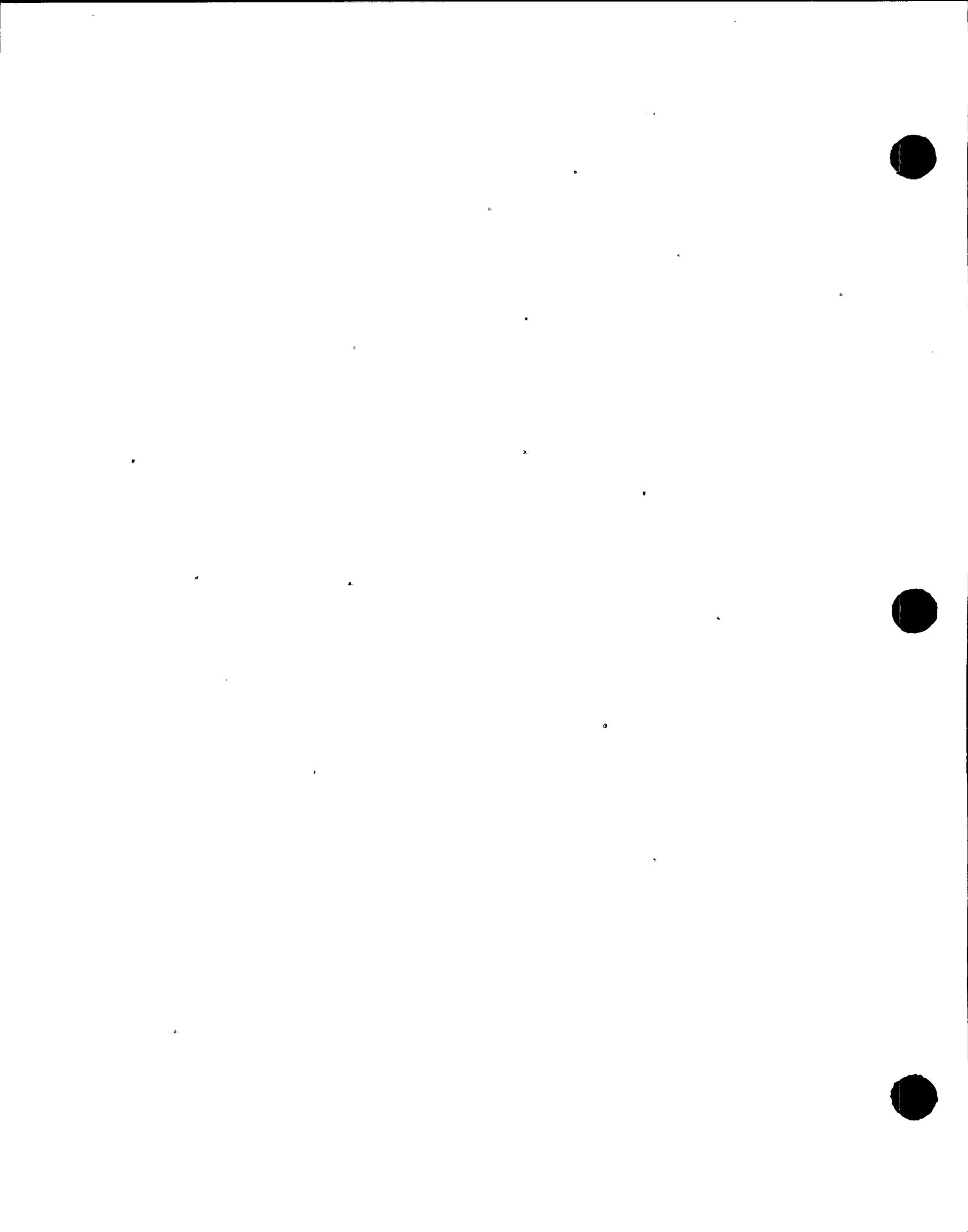


GAP Allegation #314.08.04

It is alleged that:

The staff resolution of allegation #279 permits management to remove hold tags entirely that are allegedly overbroad [sic], which is improper, since it means that corrective action against illegal conditions can be thwarted as well with impunity merely because part of the work covered by the hold tag is acceptable. (1/21/85 McDermott Aff. at 3.)

The resolution of Allegation #279 was properly based on a full review of all the facts and circumstances surrounding the removal of "hold" tags. The removal of the hold tag was accomplished after a thorough investigation conducted by the allegor's lead man which confirmed that the alleged deficient condition (use of improper tools on stainless steel material) had not, in fact, occurred. The assertion that part of the work was acceptable and part was not acceptable is simply incorrect. Accordingly, the action taken by PPP personnel in removing the hold tag was appropriate.



GAP Allegation #314.08.05

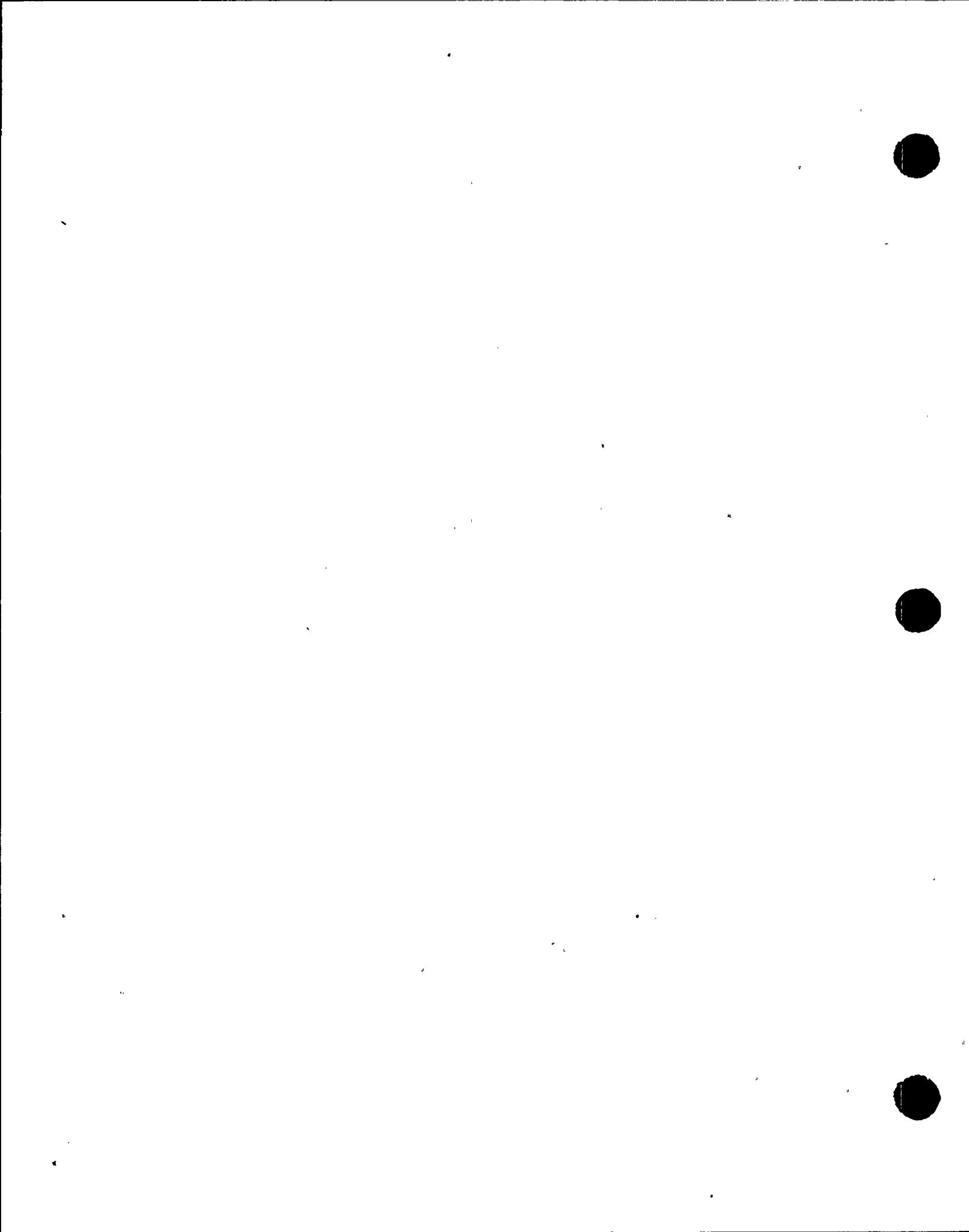
It is alleged that:

The staff mischaracterized the underlying quality dispute behind the retaliation charge in allegation #280 by saying that I had challenged the inaccessibility of a weld; since I had not raised that issue at all but rather had challenged unacceptable surface preparation through reliance on a totally inadequate tool called a peanut grinder, and failure to use the recommended surface preparation methods listed in the procedure. (1/21/85 McDermott Aff. at 3-4.)

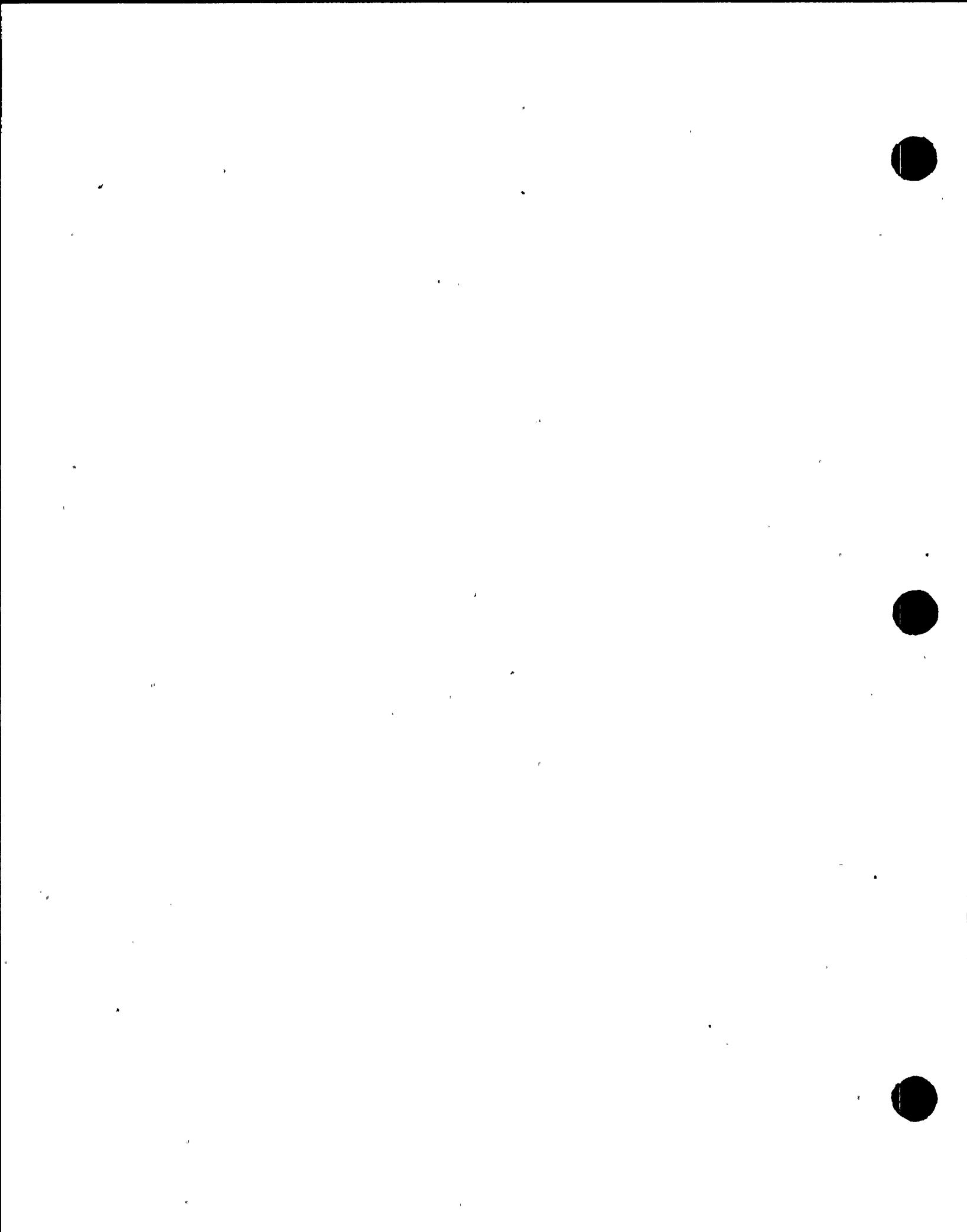
This allegation was previously addressed in PGandE's responses to Allegations #949, 950, and 951 which were submitted in PGandE letter DCL-84-343, dated October 30, 1984, and PGandE letter DCL-85-077, dated February 22, 1985.

The tool identified - a peanut grinder - is used for grinding work in confined areas such as intersections of web, flange, and stiffener plates. This tool was used in a confined area with limited access in an attempt to improve the subject weld surface preparation to permit an MT examination. However, even after using this tool the weld area in question was still inaccessible for MT examination and accordingly did not have the normal surface preparation necessary for an MT examination.

As indicated in PGandE's previous answer, if a weld or a portion of a weld is inaccessible for NDE; that fact must be noted per the applicable procedure on



the MT examination report. That was done in this case. Contrary to the allegor's assertion, surface preparation for MT is simply not required in these cases of inaccessibility. The NRC resolved this allegation in SSER-28 (for NRC Allegations #949 and 950 only), Appendix A, Attachment 3F, at p 1.



GAP Allegation #314.08.06

It is alleged that:

The weld process sheet provided by the licensee to the staff on allegation #280 is false according to the staff; since the staff claims in part to have defined my allegation on the basis of the process sheet when improper weld preparation rather than inaccessibility was the practice I had challenged at the site. (1/21/85 McDermott Aff. at 4.)

The concern in NRC Allegation #280 was investigated and subsequently resolved by the NRC in SSER 26 and NRC Inspection Report Nos. 50-275/84-11 and 50-323/84-11, dated July 13, 1984, para. 17, pp. 31-33 (attached). No claim of a "falsified" weld process sheet for Weld FW 217A was identified. The concerns about inaccessibility and weld (surface) preparation of Welds FW 217A-L and T for MT examination were previously addressed in PGandE's responses to NRC Allegations #949, 950 and 951 (DCL-84-343, dated October 30, 1984 and DCL-85-077, dated February 22, 1985, as well as the preceding response to Allegation 314.08.05), and subsequently resolved in SSER 28, for NRC Allegations #949 and #950 only.

