

APPENDIX A

NOTICE OF VIOLATION

Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant

Docket No. 50-323
License No. DPR-82

During an NRC inspection conducted from August 15 through October 30, 1987, 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 (1987), the violations are listed below:

A. 10 CFR 50 Appendix B, Criterion III, Design Control requires in part:

"Measures shall be established to assure that applicable regulatory requirements and the design basis as defined in 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and the deviations from such standards are controlled. Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of structures, systems and components."

"Specification for Erecting Main System Piping," Specification No. 8711, Revision 10 dated July 8, 1985, was implemented in construction procedure DCP-500 Revision 1 "Piping Fabrication Installation, Replacement, Repair or System Alteration." DCP-500 specifically prohibits cold springing of pipe by any means and prohibits heating of pipe to achieve bending without prior approval by Engineering.

Contrary to the above, applicable regulatory requirements and the design basis were not correctly translated into procedures and instructions; in that, on May 5, 1987 maintenance personnel torch heated to 1200 degrees Fahrenheit (F) and mechanically pulled stainless steel Residual Heat Removal (RHR) piping adjacent to flow element FE-641A without prior approval by the appropriate Engineering organizations.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 2.

- B. Facility Technical Specification 6.8.1 states that: "Written procedures shall be established, implemented and maintained covering...applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2 February 1978...." Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, specifies procedures for performing maintenance and states that maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures.



Administrative procedure AP-C-40S3 Revision 5, "Use of PIMS Corrective Maintenance Work Order Module," states in part that the work order is a planning document and that work orders shall not be used in lieu of detailed written procedures.

Contrary to the above, work order C0011616 Activity 02 of May 5, 1987, was issued in lieu of an approved procedure and directed heating of a RHR pipe to 1200 degrees F. The pipe was subsequently heated which likely caused sensitization of the stainless steel pipe.

This is a Severity Level IV Violation (Supplement I), applicable to Unit 2.

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit a written statement or 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, 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: (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.

FOR THE NUCLEAR REGULATORY COMMISSION

D. F. Kirsch

D. F. Kirsch, Director
Division of Reactor Safety and Projects

Dated at Walnut Creek, California
this 23rd day of November 1987

