PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE STREET, SAN FRANCISCO, CALIFORNIA 94106 TELEPHONE (415) 781-4211
P.O. BOX 7442, SAN FRANCISCO, CALIFORNIA 94120 TELECOPIER (415) 543-7813

ROBERT OHLBACH
VICE PRESIDENT AND GENERAL ATTORNEY

CHARLES T. VAN DEUSEN
PHILIP A. CRANE, JR.
HENRY J. LaPLANTE
JOHN B. GIBSON
ARTHUR L. HILLMAN, JR.
CHARLES W. THISSELL
DANIEL E. GIBSON
JACK F. FALLIN, JR.
JOSEPH I. KELLY
ASSISTANT GENERAL COUNSEL

GILBERT L. HARRICK
GLENN WEST, JR.
RICHARD V. GOULD
JAMES C. LOBDELL
ROBERT L. BOWDEN
PETER W. HANNCHEN
RICHARD F. LOCKE
DAVID L. LUNDBERG
WILLIAM H. EDWARDS
F. RONALD LANPHERE
ROBERT D. MORLEY
DAVID J. WILLIAMSON
BRUCE R. WORTHINGTON
SENIOR COUNSEL

EDWARD J. McDONNELL
DAN GRAYSON LUBBOCK
RICHARD J. DELASANTA
JOSHUA BARLEY
JOSEPH S. ENGLERT, JR.
ROBERT L. HARRIS
DOUGLAS A. OGILSBY
J. PETER BALDWARTNER
JOHN N. FAYE
J. MICHAEL REISENBACH
INGE K. SAMSON
SHIRLEY A. WOO
SENIOR COUNSEL

DAVID W. ANDERSON
CRAIG M. BUCHSBAUM
LESLIE S. CARNEY
AUDREY CHINES
DONALD C. ENGLESON
DAVID C. GILBERT
STEVEN F. GREENWALD
JUAN M. JAYO
MEGGIE E. LIPSON
JESSICA LORINO
A. KIRK MCKENZIE
RICHARD L. MEISS
KENNETH O. OLESON
SHIRLEY A. SANDERSON
JACK W. SPEICE
KENNETH YANG

NATHAN T. ANNANO
STEVEN P. BURKE
PAMELA CHAPPELLE
GARY P. ENGLNAS
DAVID H. FLEISIG
PATRICK G. GOLDEN
PAULA T. HAYNES
RICHARD C. JONES
HARRY W. LONG, JR.
JOHN R. LOW
ROBERT B. MCLENNAN
RICHARD H. MOSS
ROGER J. PETERS
JO ANN SHAFFER
LOUIS E. VINCENT
ATTORNEYS

April 28, 1982

Mr. R. H. Engelken, Regional Administrator
Region V
U. S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Re: Docket No. 50-275
Diablo Canyon Unit 1
License No. DPR-76

Attention: Mr. T. W. Bishop

Gentlemen:

NRC Inspection Report 50-275/82-07, dated March 29, 1982 included a Notice of Violation on a Severity Level V Violation, which required a written response by April 28, 1982. PGandE's response to the requirements of this Notice is enclosed.

Very truly yours,

Philip A. Crane, Jr.

Enclosure

PGandE's Response To Notice of Violation
In NRC Inspection Report 50-275/82-07

On March 29, 1982 NRC Region V issued a Severity Level V Notice of Violation as part of NRC Inspection Report 50-275/82-07, on Diablo Canyon Unit 1. The Notice of Violation ("Notice") cited four specific instances of construction work which did not meet quality specifications. All four instances of construction work were performed by PGandE's construction contractor, Pullman Power Products ("Pullman").

In each instance the work performed was required to meet specific quality standards of Pullman's Engineering Specification Diablo ("ESD") Number 223, in conformity with 10 CFR 50, Appendix B. The specific violations cited in the Notice, which were found by NRC inspections conducted in February 1982, were determined not to be in compliance with ESD Number 223, even though in each case the work performed was examined and accepted by Pullman's Quality Control ("QC") prior to the inspection.

The four instances cited by the NRC are listed below along with PGandE's specific response. Each response specifies the corrective actions which were taken. Following these specific responses is a general discussion of the corrective measures taken to prevent recurrence and to achieve full compliance.

Item 1): Pipe Support Number 57-117R

Undercut was found in one area of the T-shoe strap welds that was approximately 5/8 inch long and 1/16 inch deep. Adjacent to the undercut was a slag pocket that made it impossible to determine visually if the undercut was deeper or longer. Also, one arc strike was found on the Class I pipe for this support.

Response 1): Pipe Support Number 57N-117R (Reported by NRC as 57-117R)

A. Subsequent inspection by PGandE inspectors and Pullman QC showed that of 60 inches of complicated weld configuration in this area, the actual undercut was 1/4 inch long and approximately 3/64 inch deep, and was adjacent to a slag inclusion which was 3/8 inch long and 1/16 inch wide. The length and depth of undercut was acceptable in accordance with ESD Number 223, but the adjacent slag inclusion made this determination difficult. Therefore, work was initiated for removal of the slag inclusion, which exposed an undersized (by 1/16 inch) weld, and the area was reworked to bring it into compliance with the design/installation requirements. This work was completed on March 19, 1982.

B. The inspection also noted a small arc strike on the pipe adjacent to this support. In accordance with Pullman's construction procedures for correcting deficient conditions, the arc strike was buffed out, liquid penetrant examined, and the pipe wall ultrasonically examined to verify that the minimum design wall had been maintained. This work was completed on March 9, 1982.

Item 2): Pipe Support Number 41-60R

A gouge was found on the supporting structural steel for this support which measured 0.5 inch in length and 0.080 inch in depth.

Response 2): Pipe Support Number 41-60R

Work was conducted by Pullman to repair this condition in accordance with PGandE's instructions. This work was completed on March 16, 1982.

Item 3): Pipe Support Number 2155-42

This support was found to have one weld that was not in conformity with details on the as-built drawing. The weld detail, as specified, was later determined to be a drafting error, hence the weld on the support conforms to the Designer/Engineer's requirements. In addition, on one end of this pipe support a number of weld discrepancies were found "circled" indicating that work on the support was incomplete, even though this support was presented to the inspectors as examined and approved by QC.

Response 3): Pipe Support Number 2155-42

A. The Notice identified a minor weld symbol drafting error that was not detected during the as-built checking of the support drawing. A revision to revise the support drawing was initiated by Pullman and the revised drawing was resubmitted to PGandE for approval. The revision of the drawing was completed on March 17, 1982.

B. The Notice also stated that "on one end of the pipe support a number of weld discrepancies were found 'circled' indicating that work on the support was incomplete. However, this support was presented to the inspectors as examined by Quality Control and considered acceptable". PGandE asserts that the conditions as identified by the NRC were, in fact, acceptable and were in accordance with Pullman's installation and inspection procedures as specified in ESD Number 223. The conditions circled affected only the appearance but not the quality of the weld. However, these conditions were noted because, at that time, other work was being performed in adjacent areas. Nevertheless, PGandE instructed Pullman to perform additional work to correct the cited weld conditions. This work was completed on February 16, 1982.

Item 4): Pipe Support Number 2180-18

This support was found to have two bolts on the T-shoe strap for the support that did not have full thread engagement.

Response 4): Pipe Support Number 2180-18

This support is a simple springcan hanger utilizing a welded beam attachment and a 3-bolt clamp to attach the springcan between the building structure and the pipe. No T-shoe strap is used on this support. However, upon further inspection by PGandE and Pullman, one bolt on the 3-bolt clamp was found to have insufficient thread engagement. Additional work by Pullman to correct this situation was completed on March 17, 1982.

PGandE agrees that it must assure compliance with applicable quality control procedures and requirements. Accordingly, PGandE has re-emphasized to Pullman the necessity of strict adherence to all of the installation requirements. In addition, in an effort to prevent similar occurrences and to assure an adequate and uniform understanding of the installation requirements, the following training has been conducted:

1. All contractor craft personnel have been directed in writing as well as verbally by their supervisors to use extreme care in protecting all existing plant installations.

2. Detailed training sessions for contractor field engineers, QC inspectors, and craft supervision were conducted on March 2 and 3, 1982. This training dealt with the proper information required in order to assure complete and accurate documentation of the installation.

3. Seven training sessions were conducted between March 12 and 16, 1982, where typical welded support structures were utilized as examples to assure a uniform understanding of the "final visual" weld acceptance criteria stated in ESD Number 223. These classes were conducted for contractor QC inspectors, field engineers, superintendents, craft general foremen and craft foremen.

As a result of the actions described above, the concerns expressed in the Notice have been addressed. These actions have been taken in accordance with approved quality assurance requirements. Furthermore, since the steps to prevent recurrence have been completed, full compliance with the stated requirements has been achieved.

Finally, PGandE will continue to insure that compliance is maintained through an ongoing surveillance program of the visual inspections, field verifications, and continuing document reviews.