

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of)	
)	
PACIFIC GAS AND ELECTRIC COMPANY)	Docket Nos. 50-275
)	50-323
(Diablo Canyon Nuclear Power Plant,)	
Units 1 and 2))	(Full Power Proceeding)

REPLY OF PACIFIC GAS AND ELECTRIC COMPANY
TO GOVERNOR BROWN'S MOTION RE BOARD
NOTIFICATION PNO-5-82-09
AND I&E INFORMATION NOTICE 82-11

PGandE answers the above-captioned motion as follows:

1. That portion of the motion concerning Board Notification PNO-5-82-09 is essentially a repeat of an earlier motion by Governor Brown dated March 18, 1982. The Board ruling on that motion, which is equally applicable to the instant motion, was as follows:

"No final judgment will be taken in this matter until such time as a thorough evaluation can be made of any newly discovered, relevant information."
(Order dated April 2, 1982.)

PGandE's investigation into the errors identified in Board Notification PNO-5-82-09 is not yet complete. When it is complete the results will be included in the next regular bi-monthly report submitted to the Commission and all parties as a part of the independent design verification program.

The second part of Governor Brown's motion refers to I&E Bulletin 82-11, a copy of which is enclosed as Attachment A. The

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bulletin concerns potential inaccuracies in wide range pressure instruments used in Westinghouse designed plants. At Diablo Canyon these instruments are located outside containment, and therefore are not subject to the environmental conditions which lead to the inaccuracies noted in the bulletin. (See Attachment B.)

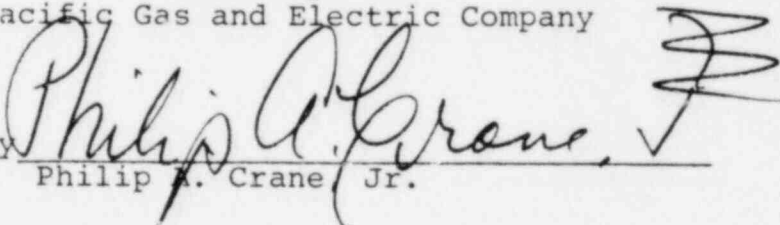
Respectfully submitted,

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Attorneys for
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BY 
Philip A. Crane, Jr.

DATED: May 25, 1982

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

April 9, 1982

IE INFORMATION NOTICE NO. 82-11: POTENTIAL INACCURACIES IN WIDE RANGE
PRESSURE INSTRUMENTS USED IN WESTINGHOUSE
DESIGNED PLANTS

Addressees:

All nuclear power reactor facilities holding an operating license or a construction permit. (This information was transmitted by facsimile on April 9, 1982 to Westinghouse designed nuclear power plants holding an operating license.)

Purpose:

This Information Notice is provided as an early notification of a potentially significant problem pertaining to wide range pressure instruments used in Westinghouse nuclear power plants. It is expected that recipients will review the information for applicability to their facilities. No specific action or response is required at this time.

Description of Circumstances:

By telephone calls on April 7 and 8, 1982, Westinghouse notified the NRC of information it had conveyed to its customers regarding the results of recent qualification tests in post-accident high energy line break environment on the wide range pressure instruments supplied by Westinghouse. Westinghouse stated that when combining transmitter, signal conditioning and indicator allowances for errors due to calibration uncertainty, drift and environmental effects that the qualification tests indicated that the RCS wide range pressure channels exhibited ambiguities in their accuracy which could potentially result in inappropriate operator actions.

Westinghouse stated that post-accident accuracy ambiguities for RCS wide range pressure instruments under certain plant accident conditions have the potential for maximum accumulated inaccuracies of ± 363 psig actuation and ± 390 psig indication. Accordingly, the inaccuracy of RCS wide range pressure measurements could lead to pressurizer power operated relief valves being lifted prior to the termination of safety injection (SI) and to a greater number of valve challenges, thereby increasing the probability of a small break loss-of-coolant accident due to a valve failing to close. Likewise, the inaccuracy of the wide range pressure instruments could lead to the termination of SI without adequate reactor coolant subcooling. In addition, the inaccuracies could lead to premature or late tripping of the RCS pumps during the course of a small break loss-of-coolant accident.

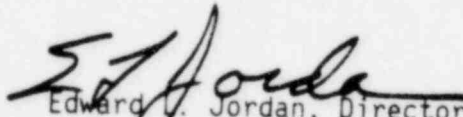
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IN 82-11
April 9, 1982
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Westinghouse further stated that it is reviewing the design and operational bases for the wide range pressure instrumentation, that it will advise its customers of appropriate actions, and that continued safe plant operation has been demonstrated by prior analyses.

If you have any questions regarding this matter, please contact the Regional Administrator of the appropriate NRC Regional Office, or this office.

Sincerely,



Edward L. Jordan, Director
Division of Engineering and
Quality Assurance
Office of Inspection and Enforcement

Attachment:
Recently Issued IE Information Notices

PG&E**FOR INTRA - COMPANY USES**

From Division or
Department MECHANICAL AND NUCLEAR ENGINEERING

FILE NO. 140.110

RE LETTER OF
SUBJECT Potential Unreviewed Safety Question

To Division or
Department M&NE FILES

April 7, 1982

MEMORANDUM TO FILE:

Mr. Lonnie Benson of Westinghouse called at 1:30 p.m., today. Present in my office were Bob Streich of M&NE and Harry Isakari of Nuclear Projects.

Lonnie stated that the Westinghouse Safety Review Group had met and determined that a generic potential unreviewed safety question exists for plants with reactor coolant system wide range pressure transmitters located inside containment during a loss of coolant accident.

Upon investigating, we found that these transmitters at Diablo Canyon (PT-403 and PT-405) are located outside containment (PG&E Drawing 102036, Sheet 29G) and that the generic problem did not exist.

I called Bryant Giffin of Nuclear Plant Operations to relay this message at 2:00 p.m.

J. J. Mc Cracken
J. J. MC CRACKEN

JJM(2929):sal

cc: DOBrand
 TNCrawford
 BWGiffin
 WBKaefer
 RMLaverty
 BSLeW
 GHMoore
 JDTownsend

ATTACHMENT B

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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PACIFIC GAS AND ELECTRIC COMPANY) Docket No. 50-275
) Docket No. 50-323
Diablo Canyon Nuclear Power Plant,)
Units 1 and 2)
_____)

CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company have been served today on the following by deposit in the United States mail, properly stamped and addressed:

Judge John F. Wolf
Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Judge Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Judge Jerry R. Kline
Atomic Safety and Licensing Board
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Chairman
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Chairman
Atomic Safety and Licensing
Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Docketing and Service Section

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Washington, DC 20555

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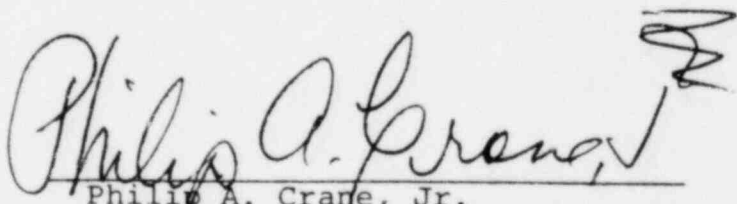
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Judge Thomas S. Moore
Chairman
Atomic Safety and Licensing
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U. S. Nuclear Regulatory Commission
Washington, DC 20555

Judge W. Reed Johnson
Atomic Safety and Licensing
Appeal Board
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Washington, DC 20555

Judge John H. Buck
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Appeal Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555


Philip A. Crane, Jr.
Pacific Gas and Electric Company

Date: May 25, 1982