

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 on April 22 through June 9, 1990, 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, the violations are listed below:

- A. Section 6.8.1 of the Diablo Canyon Technical Specifications states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Regulatory Guide 1.33, Revision 2, Appendix A, Section 9a, states that maintenance that can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Licensee Procedure NPAP-C-40, Revision 3, General Requirements for Plant Maintenance Programs, Paragraph 4.16.1 states in part that maintenance which can affect the performance of safety related equipment shall be performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

1. Contrary to the above, work order C0056311, which provided the instructions for the replacement of the Unit 2 turbine driven auxiliary feedwater pump speed governor, was not appropriate to the circumstances in that recommended vendor instructions for venting the governor were not provided in the work order. Consequently, venting was not performed, and when the turbine was operated on April 24, 1990, the turbine oversped. A potential overpressure condition for the auxiliary feed system was prevented by actuation of the turbine overspeed trip mechanism.

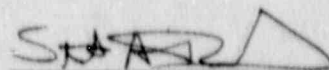
This is Severity Level IV violation, applicable to Unit 2 (Supplement I).

2. Contrary to the above, maintenance was not performed in accordance with work order C0056311 for the replacement of the Unit 2 turbine driven auxiliary feedwater pump speed governor. Specifically, when the work was accomplished on April 23, 1990: prerequisite step F (briefing) was not performed; Step 3 (recording turbine speed) was signed by the mechanic, but the speed was not recorded; Step 4 (recording leak check results) was signed by the mechanic, but the leak check results were not recorded; and Step 6 (review by foreman) was signed by the mechanic and not by the foreman.

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

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, Diablo Canyon, 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 actions 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



S. A. Richards, Chief
Reactor Projects Branch

Dated at Walnut Creek, California
This 13th day of July, 1990