

March 14, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PACIFIC GAS & ELECTRIC COMPANY) Docket Nos. 50-275 OLA-2
) 50-323 OLA-2
)
(Diablo Canyon Nuclear Power Plant) (Construction Period Recovery)
Units 1 and 2))

AFFIDAVIT OF PAUL P. NARBUT
IN SUPPORT OF NRC STAFF RESPONSE
TO SAN LUIS OBISPO MOTHERS FOR PEACE'S
MOTION TO REOPEN THE RECORD

I, Paul P. Narbut, being duly sworn, state as follows:

1. My name is Paul P. Narbut. I am employed by the Nuclear Regulatory Commission as a Regional Team Leader in the Division of Reactor Safety and Projects, Region V.
2. I was Senior Resident Inspector at Diablo Canyon from 1986-91.
3. I prepared written testimony introduced at the hearing held in San Luis Obispo, California, August 17-24, 1993, on PG&E's application to recover the time spent constructing Diablo Canyon Units 1 and 2. Specifically, my testimony addressed SLOMFP's Contention 1 alleging that PG&E lacked an effective surveillance and maintenance program. I appeared as a witness on behalf of the NRC Staff and answered questions on cross-examination. My professional qualifications are in the record following the NRC Staff's testimony, ff. Tr. 2159.

4. I have been asked to address SLOMFP's "Motion to Reopen the Record Regarding Pacific Gas & Electric Company's Application for a License Amendment to Extend the terms of the Operating License for the Diablo Canyon Nuclear Power Plant," filed February 15, 1994.

5. I am the inspector who conducted the inspection of the ASW system at Diablo Canyon and I am the author of Inspection Report 93-36. I have either led or performed inspections of the service water systems associated with Generic Letter 89-13 at all the Region V reactor sites.

6. The fact that the inspection identified potential problems with the licensee's programs is not unusual. A decision on the disposition of each of the unresolved items should be reached in the near future. The NRC does not have any concerns for the current operability of the ASW system at Diablo Canyon. Rather, the report specifically questions the operability of the ASW system in the past, when relatively infrequent conditions existed for heavy fouling of the heat exchangers coupled with high ocean temperatures. Even though discussing the probable resolution of the unresolved items in the IR would be inappropriate at this time, certain points in the motion can be addressed.

a. SLOMFP states that: "PG&E also allowed the plant to operate in exceedance of its standards for taking heat Component Cooling Water (CCW) exchangers out of service for cleaning." Motion at 6. This statement does not accurately reflect the issue as discussed in the inspection report. I considered the licensee's actions to be appropriate. The licensee declared the heat exchanger inoperable and entered the appropriate 72 hour technical specification action statement when their procedural limit

of 140 inches of differential pressure was reached. They allowed the system to run a few hours longer, without taking credit for its operability, to collect a greater amount of marine biomass in the heat exchanger prior to cleaning and thus somewhat reduce the number of heat exchanger cleaning cycles to more effectively minimize the total heat exchanger out of service time. The standard of 140 inches was used as a limit of operability and was appropriately, to my knowledge, followed by the licensee. The standard of 140 inches was not a limit for taking the heat exchanger physically out of service.

b.i. SLOMFP states that PG&E did not fulfill their commitments to the NRC to maintain an ongoing maintenance and surveillance program and cites, as an example, the fact that: ". . . the licensee temporarily allowed the heat exchangers to exceed their operational differential pressure limit of 140 inches" Motion at 8. As discussed in subparagraph 6a. above, I did not consider the licensee's actions to be inappropriate. Therefore, I did not consider their actions to be a failure to fulfill their commitments to the NRC. Thus, the first example is not supported.

b.ii. SLOMFP discusses the use of temporary test instruments for the performance of surveillance flow testing as a second example of a failure of the licensee to fulfill their commitments to the NRC. Motion at 8. The use of temporary instruments is normal and ordinary practice for surveillance testing. The point of the inspection report discussion was that I observed that operators did not have flow indicating instruments available to them for use on a day-to-day basis. Although I consider the provision of such flow instruments would be an enhancement for the operators, there is

no requirement that such instruments be provided. The inspection report states this expressly. IR, Details at 12. Therefore, I did not consider this action to be a failure of the licensee to fulfill their commitments to the NRC. Consequently, the second example provided in the motion is not supported.

b.iii. SLOMFP also discusses the use of test acceptance values which had not been reviewed or approved by the NRC as a third and final example of a failure of the licensee to fulfill their commitments to the NRC. Motion at 8. The question I raised in the report dealt with the need to have the Auxiliary Saltwater System (ASW) design basis, not the surveillance test acceptance values, reviewed by the NRC. Neither subject was a commitment to the NRC. Therefore, I did not consider this item to be a failure of the licensee to fulfill their commitments to the NRC. Consequently, the third example provided in the motion is not supported.

c. Section III of the Motion is titled "New Evidence of Maintenance Deficiencies and Safety Problems is Identified in Inspection Report 93-36." Motion at 6. Subsection E, titled "Lack of ASW Flow Instruments for Operator Information," is provided as an example of new evidence of maintenance deficiencies and safety problems. Motion at 17. As explained in paragraph b.ii above, I considered the provision of such flow instruments would have been an enhancement for the operators, but there was no requirement that such instruments be provided. The inspection report stated this expressly. IR, Details at 12. Therefore, I do not consider the lack of ASW flow instruments to be a maintenance deficiency or a safety problem, as stated in the motion.

d. SLOMFP states that ". . . NRC Staff's testimony in this case . . . [is] . . . directly contradicted by the findings in Inspection Report 93-36." The motion provides examples of NRC testimony stating that the "performance of maintenance and surveillance at Diablo is considered to be superior and clearly supportive of safe facility operation" and "generally the licensee has dealt with problems in the maintenance and surveillance areas effectively" and has "corrected a great majority of the problems promptly." Motion at 20. I do not consider that the testimony that Ms. Miller, Ms. Peterson and I gave at the hearing was contradicted by the inspection findings of Inspection Report 93-36. Although the report identified several unresolved issues that may prove to be violations, the NRC Staff's testimony given at the hearing also discussed several examples where PG&E's performance was not exemplary in maintenance and surveillance areas. The occurrence of problems was included in our overall assessment of their performance at the time of our testimony. It was never our expectation that the PG&E staff would never again have problems in the maintenance and surveillance areas. It is my personal opinion that the inspection report examples will result as negative examples of the performance of engineering but that the overall adequacy of the maintenance and surveillance programs will not be significantly affected by these examples.

e. SLOMFP states, based on the IR's descriptions of unresolved items dealing with a heat capacity test failure and questions dealing with the validity of tube plugging criteria, that: "Thus, the operability and reliability of the ASW system are in doubt." Motion at 22. The IR more fully described the fact that the operability of the

ASW system was not in question due to the low sea water temperatures being experienced and that operability might come into question if the temperature of the seawater approached the higher design basis values. This preliminary determination allowed time for a detailed assessment of operability. Therefore, SLOMFP's conclusion in the motion regarding ASW system inoperability is oversimplified and unsupported.

f. SLOMFP states that: "... a single inspection of only one safety system at PG&E has revealed an extraordinary number of omissions and deficiencies . . ." and "... this evidence thus provides significant support for SLOMFP's proposed finding regarding the general inadequacy of PG&E's routine surveillance and testing programs." Motion at 24. As described in detail in the NRC Staff's testimony, the inspection program looks at many surveillances and tests over a span of a single year. NRC Staff Testimony, ff. Tr. 2159 at 4. These inspections have consistently found the performance of surveillance testing to have been proper. Thus, I do not consider that the general inspection findings provide any support for the proposed SLOMFP finding that PG&E's routine surveillance and testing programs are generally inadequate.

g. SLOMFP discusses its proposition that lack of communication leads to inadequate maintenance at Diablo Canyon in its Motion at 24-25. As an example, in reference to the results of the heat capacity test results for CCW Heat Exchanger 1-2, the motion states that "... the Inspection Report does not even state whether the Maintenance Department was made aware of the test failure." Motion at 25. It is my opinion that informing the Maintenance Department of the results of an engineering test would have served no purpose, since the evaluation of the problem of the test failure

would be an engineering responsibility. Therefore, the notification of maintenance, or lack of it, would not be germane to a communication issue. Additionally, the motion states that ". . . maintenance personnel, who would have had practical experience with the appropriateness of setpoints triggering maintenance of heat exchangers, were not consulted regarding problems with the acceptability of these setpoints." Motion at 25. The motion goes on to describe other perceived lacks of communication that were attributed to the Inspection Report, Details at 9. Again it is my opinion that consulting maintenance personnel about the appropriateness of setpoints would not be advisable since such decisions are an engineering responsibility. Moreover, this section of the motion has not at all properly characterized the followup item described in the Inspection Report, Details at 9. The followup item did not deal with communication, but rather dealt with the need for the licensee to reperform the review of their design basis for ASW, which had been done in response to Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment," issued on July 18, 1989. Therefore, I conclude

that this section of the motion does not support SLOMFP'S conclusion that lack of communication leads to inadequate maintenance at Diablo Canyon.

Paul P. Narbut
Paul P. Narbut

Subscribed and sworn to before me
this 14th day of March 1994

Andrea Rogers
Notary Public



My commission expires: Aug 20, 1996