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October 13, 1982

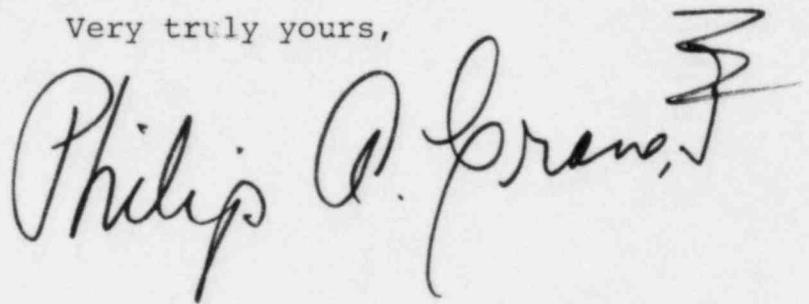
Mr. R. H. Engelken, Regional Administrator
U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

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

Dear Mr. Engelken:

NRC Inspection Report 50-275/82-28, dated September 13, 1982 included a Notice of Violation (Severity Level V). PGandE's response to this Notice is enclosed.

Very truly yours,



Enclosure
cc w/encl: Service List

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PDR ADOCK 05000275
PDR
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PGandE'S RESPONSE TO NOTICE OF VIOLATION
IN NRC INSPECTION REPORT 50-275/82-28

On September 13, 1982, NRC Region V issued a Severity Level V Notice of Violation as part of NRC Inspection Report 50-275/82-28 on Diablo Canyon Unit 1. The Notice cited a concern related to requirements for a fire watch when the automatic Cardox fire suppression system in the Cable Spreading Room was disabled for personnel safety. The violation was described in the Notice as:

Facility Operating License DPR-76, Section 2.C(2), incorporates the Technical Specifications into the license.

Technical Specification 3.7.9.3.a requires that "With the above required automatic low pressure CO₂ system inoperable, within one hour establish a continuous fire watch...for those areas in which redundant systems or components could be damaged..." The areas protected by the low pressure CO₂ (CARDOX) system include the cable spreading room.

Contrary to the above requirement, it was identified at about 10 a.m., on August 3, 1982 and about 12:30 p.m. on August 4 and 5, 1982, that a continuous fire watch was not present in the Cable Spreading Room and the CARDOX system was disabled. Further, it was established that the CARDOX system is regularly disabled during workdays from about 8 a.m. to 4:30 p.m., for personnel safety reasons during construction activities, and that fire watch continuity was not consistently maintained during work breaks.

PGandE believes that no violation occurred based on the following facts:

Because Technical Specification 3.7.9.3 requires the low pressure CO₂ (Cardox) system to be operable whenever equipment protected by the system is required to be operable, and since the plant is not in any defined mode, the only equipment required to be operable is that which is required At All Times. Only a limited number of process radiation monitors and associated equipment is required to be operable At All Times. These monitors are located in various parts of the plant; however, signal and control wires pass through the Cable Spreading Room. Due to this fact, we concur that the Cardox system for the Cable Spreading Room is required to be operable or the action requirements of Technical Specification 3.7.9.3 are to be implemented. These action requirements consist of two parts, 1) for areas in which redundant equipment is located, a continuous fire watch is required and 2) for other areas an hourly fire watch patrol is required.

With the plant in its present condition, with no fuel in the reactor and no irradiated fuel on site, no redundant equipment is required to be operable by the Technical Specifications. Therefore, we believe that an hourly fire watch patrol was all that was required.

Personnel working in the area normally serve as the fire watch. When these personnel left for a break (10 minutes) or for lunch (30 minutes), a fire watch was not present. PGandE believes that the implementation of an hourly fire watch patrol met the requirements of the Technical Specification. It should also be noted that all 15 smoke detectors in the area were operable during this period and are alarmed in the control room.

The initial notification of this apparent violation was made by the NRC Resident Inspectors on August 3, 1982. At that time, PGandE started an evaluation of the situation and initiated corrective action. An instruction was promptly issued to comply with the NRC Inspectors' interpretation of the subject Technical Specification. This instruction did not produce the desired results as evidenced by the similar occurrences on August 4 and 5, 1982. Therefore, Auxiliary Operators were detailed to provide a fire watch, and training was initiated to qualify security officers for fire watch duty.

Since August 9, 1982, trained security officers have been providing a continuous fire watch whenever the Cardox system has been made inoperable and construction activities are taking place in the Cable Spreading Room. When the Cardox system is inoperable and construction activities are not taking place then plant staff personnel serve as the fire watch. We intend to continue this fire watch practice as long as construction activity persists in the area or until a resolution of the interpretation of this item is achieved. We request a meeting with the appropriate NRC personnel to resolve the differences of interpretation.