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April 8, 1983

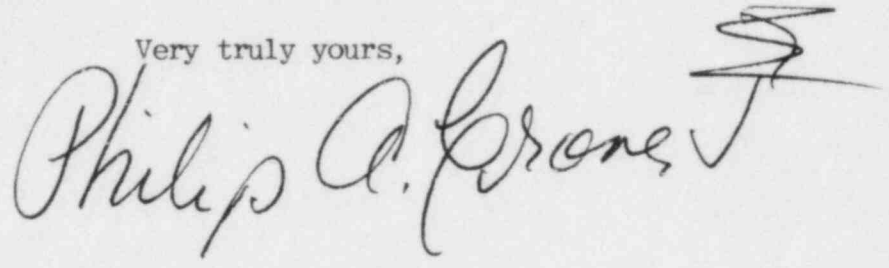
Mr. John B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-323
Diablo Canyon Unit 2
Response to Notice of Violation -
NRC Inspection Report 83-04

Dear Mr. Martin:

NRC Inspection Report 50-323/83-04, dated March 10, 1983, included a Notice of Violation (Severity Level V). PGandE's response to this Notice is enclosed.

Very truly yours,



Enclosure

cc: Service List

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PDR ADOCK 05000323
Q PDR

83-56

PGandE's RESPONSE TO NOTICE OF VIOLATION
IN NRC INSPECTION REPORT 50-323/83-04

On March 10, 1983, NRC Region V issued a Severity Level V Notice of Violation as part of NRC Inspection Report 50-323/83-04 on Diablo Canyon Unit 2. This Notice cited the failure to administer eye examinations on an annual basis for two NDE personnel employed by Westinghouse Electric Corporation. The violation was described in the Notice as follows:

As a result of the inspection conducted on February 7-11, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9887 (March 9, 1982), the following violation was identified:

10 CFR 50 Appendix B, Criterion IX states, in part, that, "Measures shall be established to assure that special processes, including... nondestructive testing, are controlled and accomplished by qualified personnel...."

Paragraph 17.1.9 of the Quality Assurance Program documented in approved FSAR Amendment 85, states, in part, that, "Special processes include...nondestructive testing...contractors are required to use...qualified personnel for performing special processes...."

The ASME Boiler and Pressure Vessel Code, Section XI, 1977 Edition including addenda through Summer 1978, Subsection IWA-2300 "Qualification of Nondestructive Examination Personnel" paragraph(e) states, in part, that, "Nondestructive examination personnel for all methods shall be examined...to assure that they have natural or corrected near distance acuity...a color vision examination...personnel vision examinations shall be conducted annually."

Contrary to the above, on February 9, 1983, the inspector identified that the required annual visual examinations had expired for two Westinghouse individuals performing ultrasonic examinations on the Unit 2 reactor pressure vessel.

This is a Severity Level V Violation (Supplement II).

Statement of Explanation

All Westinghouse service center personnel are required to have a medical examination, eye examination and pulmonary function test yearly. The results of these tests and their expiration dates are stored in a computerized data bank operated by the service center's operations personnel.

The stored data are accessed on a periodic basis to produce hard-copy management information records. The medical related data hard-copy is generated monthly, and expiration dates are "flagged" 60 days in advance of an individual's examination. The hard-copies are routed to the cognizant service center secretaries, who then verbally notify the individuals concerned of the need to update their examinations.

In the case in point, the two personnel were out of the service center continuously from October 1, 1982 through the certifications "flagging" period and expiration date. As a result, the notification of these personnel failed to occur.

The certifications for all Westinghouse personnel were reviewed October 21, 1982, prior to the start of the work, by PGandE Quality Control personnel using approved inspection checklists. The checklist required flagging of all certifications due to expire within the expected job time frame. Since the work was scheduled to take three weeks for each Unit and be completed by December 1, 1982, no problems were expected as the certifications were current through February 1983. The job continued, however, much longer than anticipated. The eye certifications of two Westinghouse NDE personnel subsequently expired due to the referenced notification oversight between the Westinghouse Service Center and their field personnel. Additionally, the PGandE procedure and checklist lacked an effective mechanism to accommodate the unanticipated extension of the work completion schedule.

Corrective Steps Taken and Results Achieved

Upon learning of the lapsed certifications PGandE immediately ordered recertification of the Westinghouse examiners. One examiner was recertified the same day. The other was recertified the next day. All other NDE personnel certifications were re-examined to assure that all certification records were current.

Westinghouse has placed the NDE personnel certification renewal responsibility under the cognizant service center manager as opposed to his staff in order to eliminate the recurrence of expired certifications. This will assure that all pertinent information comes to the attention of the cognizant manager for action on a routine basis.

Additionally, PGandE has revised its procedure for reviewing the qualification of NDE contractor examiners to require monthly reviews through the duration of the job.

Corrective Steps Which Will Be Taken

Based on the actions described above, PGandE believes that adequate corrective actions have been taken. Therefore, no additional corrective steps are necessary.

Date When Full Compliance was Achieved

Visual Acuity Recertification for the two Westinghouse personnel was completed by February 10, 1983, the day following the discovery of the item.

Procedure revisions to prevent recurrence were completed on March 18, 1983.