

RECEIVED
NRC

PACIFIC GAS AND ELECTRIC COMPANY

PG&E

77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

JUL 28 AM 11:05
REGION V

June 27, 1983

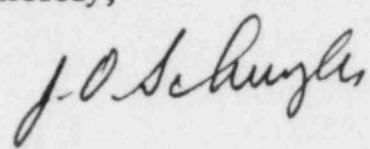
Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
Response to Notice of Violation -
NRC Inspection Report 50-275/83-17

Dear Mr. Martin:

NRC Inspection Report 50-275/83-17, dated May 26, 1983, included a Notice of Violation (Severity Level V) that required a written response within 30 days. PG&E's response to this Notice is enclosed.

Sincerely,



Enclosure

cc w/enc Service List

PGandE's RESPONSE TO NOTICE OF VIOLATION
IN NRC INSPECTION REPORT 50-275/83-17

On May 26, 1983, NRC Region V issued a Severity Level V Notice of Violation ("Notice"), as part of NRC Inspection Report 50-275/83-17 on Diablo Canyon Unit 1. The Notice cited a concern related to the failure of General Construction to take specific actions to inform the Plant Manager about a potentially reportable item until the Plant Superintendent initiated an inquiry into the circumstances. The violation was described in the Notice as:

10 CFR 50, Appendix B, Criterion V, as implemented to Section 17.1.5 of the FSAR states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings... and shall be accomplished in accordance with these instructions, procedures or drawings..."

General Construction Procedure 12.1 requires that "The Plant Manager and/or Plant Superintendent shall be notified of all potentially reportable items."

On April 19, 1983, gouges and marks were found by General Construction on Unit 1 Reactor Coolant System piping in the vicinity of the discharge piping of reactor coolant pump No. 1-3. On April 20, 1983, the General Construction organization informed the General Office, in San Francisco, California, and a Region V NRC inspector of this finding. Contrary to the above requirements, General Construction did not take specific action to inform the Plant Manager and/or the Plant Superintendent of the above findings until the Plant Superintendent initiated action to determine the circumstances, by a telephone call to General Construction, on April 20, 1983.

Corrective Steps Taken and Results Achieved

1. A meeting was held May 18, 1983 between Senior Diablo Canyon Project and Nuclear Plant Operations (NPO) Management to discuss improving communications between departments and to clarify responsibilities. Several items were clarified, reemphasized, and/or agreed to, including:
 - a. NPO has the primary responsibility for problem investigation and reporting for items related to Unit 1.
 - b. Because of heavy construction currently in progress at the site, the on-site Project organization, with its appropriately larger staff, has been assigned the responsibility for timely review of all problem reports generated by the construction effort (including Contractors) and promptly bringing to the attention of NPO personnel any item that may be reportable.
 - c. When notified of a potentially reportable item, or when identifying such an item internally, NPO personnel will take the lead in assuring an adequate investigation is conducted, a determination of reportability is established, and reporting is accomplished when necessary.

PGandE intends to implement these objectives as follows:

- a. The responsibility for timely review of items by NPO on Nuclear Plant Problem Reports rests with the department heads on the NPO Plant staff. The responsibility for review of Construction Deficiency Reports and other such construction problem reporting documents rests with the General Construction Resident Engineers.
 - b. Any problem that could be reportable based upon the review of Construction Deficiency Reports by General Construction is immediately documented in a Nonconformance Report, which is transmitted to NPO. In addition, the Project Superintendent is responsible for promptly notifying the NPO Plant Manager of the item.
 - c. In accordance with established procedures for handling nonconformances, a Technical Review Group (TRG) is convened to analyze the problem, determine responsibility¹, and determine the appropriate solution. As a result of the changes being described herein, NPO personnel will now chair all TRG's involving Unit 1.
 - d. To increase management's early awareness of potentially reportable items, preliminary copies of all Nonconformance Reports are now sent to both the Manager, NPO and the Diablo Project Completion Manager. Distribution to the Diablo Canyon Project Completion Manager will terminate on completion of Project involvement in Diablo construction for both Units 1 and 2.
2. A meeting was held May 24, 1983 between Senior Diablo Canyon Project Personnel, Nuclear Power Generation Management and Messrs. T.W. Bishop, G. Hernandez, J. Carlson and H. Mendonca of the NRC at which time PGandE discussed the previously noted proposed actions to improve the delineation of authority between General Construction and NPO with respect to reporting requirements.
 3. Training for key General Construction and NPO personnel on identifying Nonconformances and NRC reporting requirements was conducted June 7, 1983 at the site. This training included a review of the Technical Specifications, Regulatory Guide 1.16, and other information concerning reporting as described in NPO procedures. At the request of the Manager, NPO, a followup training session was conducted on June 23, 1983 to assure understanding of and compliance with NPO and Diablo Canyon Project procedures.

¹ Procedures also permit immediate reporting to the NRC before convening a TRG when the situation warrants.

4. The Plant Staff Review Committee (PSRC) reviewed revisions to Nuclear Plant Administrative Procedure C-11, "Non-Routine Notification and Reporting to the Nuclear Regulatory Commission and Other Governmental Agencies"; C-12, "Identification and Resolution of Problems and Nonconformances"; C-12S2, "Processing Nonconformance Reports"; and E-11, "Licensee Event Report Processing" to incorporate the various changes discussed above. The review was completed and approval recommended on June 9, 1983.
5. General Construction's Procedure 12.1 will be revised by July 1, 1983 to strengthen and clarify the communication and reportability responsibilities. In the interim, the processing of Nonconformance Reports is in compliance with the above described process. NPO Staff members are involved in the revision of this procedure.

Corrective Steps Which Will Be Taken To Avoid Further Items Of Noncompliance

Based on the actions described above and already implemented, PGandE believes that adequate corrective action has been taken. Therefore, no additional corrective steps are necessary.

Date of Full Compliance

Full compliance will be achieved on July 1, 1983.