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PACIFIC GAS AND ELECTRIC COMPANY

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GEORGE A. MANEATIS
EXECUTIVE VICE PRESIDENT

June 15, 1984

PGandE Letter No.: DCL-84-228

Mr. R. C. DeYoung, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
Response to NRC Enforcement Action EA 84-42

Dear Mr. DeYoung:

On May 17, 1984, the NRC Region V issued Enforcement Action EA 84-42, comprising a Severity Level III Notice of Violation and Proposed Imposition of Civil Penalty (Notice), for an event that occurred on April 6, 1984.

Pursuant to 10 CFR Part 2 and in accordance with the Notice, enclosed is PGandE's response to the Notice with a check for \$50,000 payable to the Treasurer of the United States. As stated in the Notice, PGandE identified the violation and promptly reported it to the NRC. Further, PGandE also took prompt corrective action to prevent recurrence.

PGandE fully recognizes its responsibility to assure that procedures are adequate and consistent with regulatory requirements, and that operators are fully cognizant and aware of those regulatory requirements. As described in the enclosed response, PGandE believes appropriate and timely actions are being taken to fulfill these responsibilities.

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Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Subscribed to in San Francisco, California this 15th day of June, 1984.

Respectfully submitted,

Pacific Gas and Electric Company

Robert Ohlbach
Philip A. Crane, Jr.
Richard F. Locke
Douglas A. Oglesby
Attorneys for Pacific
Gas and Electric Company

By *G. A. Maneatis*
G. A. Maneatis
Executive Vice President
Facilities and Electric
Resources Development

Subscribed and sworn to before me
this 15th day of June, 1984

By *Douglas A. Oglesby*
Douglas A. Oglesby

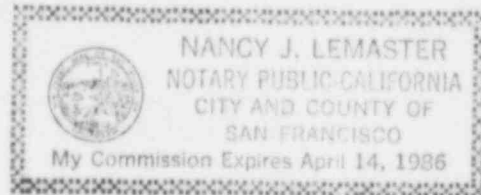
Nancy J. Lemaster
Nancy J. Lemaster, Notary Public in
and for the City and County of
San Francisco, State of California



My commission expires April 14, 1986.

Enclosure

cc: G. W. Knighton
J. B. Martin
Service List



ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION AND PROPOSED
IMPOSITION OF CIVIL PENALTY

NRC ENFORCEMENT ACTION EA 84-42

On May 17, 1984, NRC Region V issued Enforcement Action EA 84-42 comprising a Severity Level III Notice of Violation (Notice) and Proposed Imposition of Civil Penalty. The Notice cited:

- Unit 1 Technical Specifications were violated when the Boron Injection Tank (BIT) was valved out of service and electrical power was removed from the valve operators to permit draining and refilling the tanks with 12 percent boric acid solution. This action would have prevented the charging pumps from injecting coolant through the BIT and into the Reactor Coolant System upon actuation of a safety injection signal when in Modes 1, 2 or 3.

STATEMENT OF VIOLATION

"Technical Specification 3.5.2 reads, in part:

'Two Emergency Core Cooling System (ECCS) subsystems shall be OPERABLE with each subsystem comprised of:...

- a. One OPERABLE centrifugal charging pump,...
- b. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a safety injection signal and manually transferring suction to the containment sump during the recirculation phase of operation.

APPLICABILITY: MODES 1, 2 and 3.

- a. With one ECCS subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in at least HOT SHUTDOWN within the following 6 hours.'

Technical Specification 3.0.3 reads in part:

'When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable in:

- 1. At least HOT STANDBY within the next 6 hours,
- 2. At least HOT SHUTDOWN within the following 6 hours, and
- 3. At least COLD SHUTDOWN within the subsequent 24 hours.'

Contrary to the above requirements, on April 6, 1984 at about 7:10 P.M., the inlet and outlet valves to the Boron Injection Tank (BIT) were closed and disabled by securing the electrical power to the valve operators. This action blocked and rendered inoperable the flow path between the centrifugal charging pumps and the reactor coolant system for both ECCS subsystems. The valves were returned to service at about 10:10 A.M. on April 7, 1984. The reactor was in Mode 3 at all times during this period.

This is a Severity Level III violation (Supplement I) (Civil Penalty - \$50,000)."

ADMISSION OR DENIAL OF THE VIOLATION

PGandE admits to the Violation as described above.

REASONS FOR THE VIOLATION

In the Fall of 1983, Operating Procedure OP B-1C, "12% Boric Acid System" was revised by the operations group, reviewed by the Plant Staff Review Committee (PSRC) and approved by the Plant Manager. At that time, the procedure contained instructions to isolate the BIT in order to recharge it with 12% boric acid solution. The need to maintain an operable ECCS subsystem in Modes 1, 2 and 3, as required by Technical Specification 3.5.2, was not identified.

The procedure revision was prompted by an event that occurred at and was reported by another operating plant and was subsequently disseminated by the Institute of Nuclear Power Operations (INPO) NETWORK system. The plant had injected the contents of the Boron Injection Tank (BIT) into the Reactor Coolant System and, in the process of refilling the BIT, had left the isolation valve circuit breakers closed. If a second safety injection signal had been received, the valves would have opened and the charging pumps could have tripped out due to pumping into an empty BIT. The NETWORK entry concluded by recommending that other operating plants consider either opening their isolation valve breakers when recharging the BIT or by restoring the boric acid concentration by recirculation of the BIT with the Standby Boric Acid Tank.

Prior to beginning tests of the steam generator safety valves, a temporary operating procedure was written and approved covering the anticipated safety injection and recovery operations. The procedure specified use of Operating Procedure OP B-1C to accomplish recharging of the BIT. As expected, a safety injection occurred on April 6, 1984, during the steam generator safety valve tests. The safety injection resulted in discharge of the BIT, which was subsequently recharged in accordance with Operating Procedure OP B-1C while in Mode 3. As noted, the recharging operation was performed with the BIT isolated, thus rendering both ECCS flowpaths inoperable for approximately 15 hours and in violation of Technical Specifications 3.5.2 and 3.0.3.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

Upon discovery, during routine control panel walkdown, that both ECCS subsystems were inoperable, the circuit breakers to the BIT isolation valves were closed, thus reestablishing the required flow path. The event was reported to the NRC Operations Center within one hour by telephone in accordance with 10 CFR 50.72 and a Licensee Event Report was submitted within 30 days.

A new operating procedure "Restoring Boron Injection Tank After Safety Injection", was issued to allow recharging of the BIT without exceeding Unit 1 Technical Specifications. Additionally, all operating procedures involving equipment subject to technical specification limitations have been reviewed in order to identify and correct similar situations.

A Senior Operations Engineer, Shift Foreman, and Senior Operator Training Instructor visited the Trojan and San Onofre Power Stations to review the methods used by these plants to control the configuration of Engineered Safety Features (ESF) equipment. An evaluation of these methods has resulted in the initiation of modifications to several Diablo Canyon Power Plant operating procedures.

To further help assure the technical adequacy of plant procedures, Administrative Procedure E-4, Procedures, was revised on June 11, 1984 to add the requirement to conduct an independent technical review for operating, emergency, testing, maintenance, chemical, and radiochemical procedures with substantial technical content. This review will be performed by a knowledgeable individual selected by the appropriate department head. The reviewer shall not be the author, but may be the author's line supervisor. The independent reviewer will be responsible (along with the author) for assuring that:

- The procedure will accomplish the desired results.
- Technical Specifications, cautionary notes, and other such references are clearly specified so that the user is not misled.
- Setpoints, valve numbers, limits, and other such information are correct.
- The procedure is clear and unambiguous.
- Technical Specifications and other license conditions are complied with.

The independent review shall be documented by the signature of the reviewer and a brief statement of the general nature of the review (for example, what was looked at, references used, whether the procedure was tried in the field). Independent technical reviews of subsequent revisions will be required only if the technical nature of the procedure is changed. The normal biennial review of a procedure is, in itself, an independent review and should serve as such unless major changes are made to the procedure. The independent review will not be performed for minor editorial changes. The appropriate department head shall determine whether an independent technical review is necessary. The independent technical review will be documented on the procedure history form, which is attached to the affected procedure when presented for Plant Staff Review Committee (PSRC) review. During the procedure review by the PSRC, the procedure sponsor will delineate any substantive changes to the procedure to the members of the Committee. Additionally, the Plant Manager has advised the members of the PSRC to review procedures on the Committee agenda prior to the meeting.

The enhanced procedure review process will apply to those referenced procedures that are important to safety, important to environmental quality, or security related.

During Unit 1 low power testing, senior management personnel were temporarily assigned to 12 hour rotating shifts in the control room to provide assistance as needed. They monitored the pace of operations, ensured the control room was not overcrowded, and recorded pertinent observations. Recommendations related to improvements in plant operations were provided to the Plant Superintendent and the Plant Manager.

In order to assure that procedures are adequate and consistent with regulatory requirements and that operators are fully aware and cognizant of regulatory requirements, the following discussions have occurred:

- The Plant Superintendent met individually with operators to discuss adherence to procedures and the necessity to evaluate procedures to ensure that they are correct and adequate to accomplish the intended operation.
- Discussions were held with operations personnel to emphasize the necessity to generally slow down the pace of activities and pay particular attention to all operations involving safety-related equipment.
- Licensed operators attended a refresher training session on Technical Specifications requirements.

CORRECTIVE STEPS WHICH WILL BE TAKEN

A cross reference document correlating plant equipment with technical specification requirements is being developed. The intent is to provide a quickly accessible data base for use by plant personnel to determine all technical specification requirements related to specific equipment.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with all technical specification requirements was achieved on April 7, 1984 with the reclosing of the BIT isolation valve circuit breakers.