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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

REGION V IAE

October 2, 1984

PGandE Letter No.: DCL-84-321

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

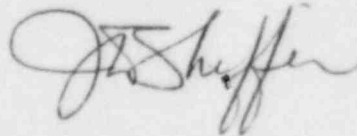
Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
Response to IEJR 50-275/84-21 -- Notice Of Violation

Dear Mr. Martin:

NRC Inspection Report 50-275/84-21, dated September 12, 1984, included one Severity Level IV Violation. PGandE's response to this Notice of Violation is enclosed.

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

Sincerely,



Enclosure

cc: Service List

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ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN
NRC INSPECTION REPORT NO. 50-275/84-21

On September 12, 1984, NRC Region V issued a Severity Level IV Notice of Violation ("Notice") as part of NRC Inspection Report 50-275/84-21 for Diablo Canyon Unit 1. This Notice cited:

- A concern over the loss of both source range nuclear instrument channels as a result of a failure to follow procedures.

STATEMENT OF VIOLATION

"Technical Specification 6.8.1 states in part that:

'Written procedures shall be established, implemented and maintained covering...applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978.'

Appendix A of this guide requires procedures for '...Maintenance that can affect the performance of safety-related equipment...'

An on-the-spot change to Pacific Gas and Electric Company (PGandE) Nuclear Plant Operations Department (NPO) Surveillance Test Procedure (STP) I-16D1 'Removal from Service of the SSPS for Actuation Logic Testing and/or Maintenance During Modes 5 or 6' states:

'Note: If both trains of SSPS are being removed from service lift the following leads to prevent loss of source range high voltage. Train A TB 607-9, Train B TB 607-11.'

Contrary to the above, on June 4, 1984, while removing the Solid State Protection System (SSPS) from service to perform surveillance activities, licensee personnel failed to lift leads TB-607-9 and TB-607-11. This failure to follow procedures resulted in a loss of both source range nuclear instrument channels.'

This is a Severity Level IV Violation (Supplement 1)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

On June 4, 1984, both source range channels were inadvertently deenergized during the performance of procedure STP I-16D1 "Removal From Service Of The SSPS For Actuation Logic Testing And/Or Maintenance During Modes 5 or 6". Technicians did not lift leads TB607-9 and TB607-11 while removing both trains of the SSPS from service. This action, which is required by the approved

on-the-spot change (OTSC) attached to the procedure, would have prevented the loss of source range high voltage. When step 2.h of the procedure was performed, both source range channels were deenergized. The error was discovered immediately, and both source range channels were returned to service within one minute of discovery.

While both source range channels were out of service, Unit 1 was in Mode 5 (cold shutdown), and no fuel or control rod movement functions were in progress.

The source range nuclear instrument channels had been deenergized on two previous occasions. The first occurrence, on December 7, 1983, was attributed to improper preparation and use of procedures. A Level IV Violation (50-275/83-41-01) was issued. Corrective action included the issuance of on-the-spot change to the procedure. The second occurrence, on April 15, 1984, was attributed to a personnel error while performing the actions specified in the procedure. The error did not involve the on-the-spot-change.

The following actions were taken:

1. The high voltage to the nuclear source instrumentation was restored approximately one minute after it was deenergized.
2. Action Statement 5 of Technical Specification 3.3.1 was satisfied.
3. This event, including causes, resolution, and recommended actions for preventing recurrence, was reviewed in a "Technical Review Group." The following corrective actions were approved at that meeting.
 - a. To provide better assurance that similar errors will not occur, STP I-16D1 has been revised to incorporate the on-the-spot change (OTSC) in the text of the procedure.
 - b. To prevent similar events, such as the use of improper sequences or omissions of steps, the administrative procedure which governs OTSC's, AP E-4S4, "Issuance And Approval Of On-The-Spot Procedure Changes" was revised to require that the changes be incorporated in the actual text of the procedure within 14 days. An aggressive program has been initiated to incorporate existing OTSC's into the associated procedures.
 - c. Individuals directly involved with the event were counseled by their department managers.
 - d. The Instrumentation and Controls (I&C) Maintenance Manager conducted a training session for all I&C personnel. In addition, a memorandum was issued to I&C personnel which described the event and action being taken to prevent recurrence.
 - e. The Senior Operations Supervisor reviewed the event with all operators.

CORRECTIVE STEPS WHICH WILL BE TAKEN

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

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on June 4, 1984, when the source range channels were returned to service and the Technical Specification Action Statement was satisfied.