

*OK Central files*

JUL 27 1973

**D. J. Steinholt, Assistant Director for Operating Reactors, I**

**PACIFIC GAS AND ELECTRIC COMPANY (HUMBOLDT BAY)**

**RO INSPECTION REPORT NO. 50-133/73-01**

The enclosed report of inspections of the subject facility on April 17-20, April 30 and May 3 and 9, 1973 is forwarded for information.

Several deficiencies with respect to the development of written procedures in accordance with ANSI N-18.7, "Standard for Administrative Controls for Nuclear Power Plants," and AEC Safety Guide 33, "Quality Assurance Program Requirements" were identified during these inspections. Of particular concern is the fact that specific procedures have not been written for all plant annunciator alarms or anticipated emergency conditions. In order to minimize the preparation of written procedures, the licensee has incorporated the complete Technical Specifications into the operating procedures manual to serve as written procedures or instructions for operating personnel. This philosophy, in our view, is contrary to regulatory policy. We plan to send a Headquarters letter to the Pacific Gas and Electric Company for the purpose of reinforcing regulatory policy relating to the preparation of adequate procedures for nuclear facilities. We have discussed the above issues with representatives of the Directorate of Licensing and they concur that Technical Specifications, per se, cannot serve as a substitute for approved written procedures.

We will followup on the actions taken by licensee management in this regard during our routine inspection program and will inform you if appropriate improvement is not observed.

Original Signed by  
G. W. Rehmuth

**J. C. Keppler, Acting Assistant Director  
for Construction and Operations  
Directorate of Regulatory Operations**

Enclosure: RO Inspection  
Report No. 50-133/73-01

cc: Reg Standards (3)

DL (13)

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