

SAFETY EVALUATION

GENERIC LETTER 83-28, ITEMS 3.2.1 AND 3.2.2

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-275

I. INTRODUCTION

On February 25, 1983, during startup of the Salem Unit 1 Nuclear Plant, both circuit breakers in the Reactor Trip System failed to open automatically upon receipt of a valid trip signal. As a result of that event, the NRC's Office of Inspection and Enforcement issued IE Bulletin 83-01 which described the event and requested specified prompt corrective and preventive actions by licensees. As the cause and ramifications of the event were more clearly developed, the NRC's Office of Nuclear Reactor Regulation issued on July 8, 1983, Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events." This letter addressed issues related to reactor trip system reliability and general management capability. The letter was sent to all licensees of operating reactors, applicants for operating licenses and holders of construction permits.

One of the areas of reactor trip system reliability considered in Generic Letter 83-28 (GL 83-28), is that the post-maintenance testing of safety-related components other than those in the reactor trip system. This is identified in GL 83-28 as Items 3.2.1 and 3.2.2. This evaluation addresses the acceptability of the response to these items provided by the Pacific Gas and Electric Company (the licensee) for the Diablo Canyon Nuclear Power Plant, Unit No. 1 (the facility).

II. EVALUATION

Items 3.2.1 and 3.2.2 of GL 83-28 state as follows:

- "1. Licensees and applicants shall submit a report documenting the extending of test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of all safety-related equipment is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.
- "2. Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or Technical Specifications, where required."

By letters dated November 7, 1983 and March 20, 1986, the licensee responded to GL 83-28, Items 3.2.1. and 3.2.2.

Regarding Item 3.2.1, the licensee's letter of March 20, 1986, states Administrative Procedures NPAP-C6, "Clearances", and AP-C-6S3, "Post-Maintenance Testing", ensure that appropriate tests are conducted to verify that equipment removed from service for maintenance (either corrective or preventive) is tested prior to its return to service to determine that it is operable and is capable of performing its intended safety functions. The licensee adds that following completion of maintenance work, the appropriate post-maintenance test is run after the equipment is returned to service, but before the equipment is declared "operable".

Regarding Item 3.2.2, (incorporation of vendor recommendations in test and maintenance procedures), the licensee's letter of March 20, 1986, states that the licensee has reviewed the applicable vendor and engineering recommendations to ensure that appropriate test guidance is included in maintenance procedures as required. Regarding post-maintenance test procedures, however, the licensee states a few recommendations require further review to determine if they should be incorporated in future procedure revisions. The licensee estimates this process, including procedure revision, will be completed by June 30, 1986.

### III. CONCLUSIONS

Based on the licensee's description of facility procedures which require post-maintenance testing of safety-related equipment to demonstrate its operability and capability to perform its intended safety function, we conclude the licensee has satisfactorily completed the actions requested by Generic Letter 83-28, Item 3.2.1. Accordingly, this item is closed.

Based on the licensee's statement that applicable vendor and engineering recommendations have been reviewed and are in the process of being incorporated in test and maintenance procedures, as appropriate, we conclude the licensee is acceptably performing the actions request by Generic Letter 83-28, Item 3.2.2. Accordingly, this item is closed.

Date:

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