

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 7, 1983

NOTE FOR: Files (LIMITED DISTRIBUTION)

FROM: Robert A. Purple, Deputy Director
Division of Licensing

SUBJECT: TELEPHONE CALL FROM DR. HENRY MYERS, SUBCOMMITTEE
ON ENERGY AND ENVIRONMENT

As a followup to our meeting last Friday, Dr. Myers called me today to further discuss the information that he had on Diablo Canyon deficiencies. He prefaced his conversation by stressing that he intended to give me this information only on the condition that by Friday of this week, I would call him to tell him what has been done to follow up on the information. He expressed reluctance to convey the information to me since he was not confident that I would take the matter seriously and make a vigorous effort to get to the bottom of things. He asked me to identify who the single person was who was in charge of resolving all of the Diablo Canyon allegations and determining their significance. I told him that since the issues could involve construction deficiencies, design control deficiencies and perhaps even matters for investigation of wrongdoing, the only single person in charge would be the Executive Director for Operations. He noted that, since most of the items appear to be related to construction deficiencies, he planned to call Jack Martin of Region V later today. (I subsequently telephoned Mr. Martin's office, who was unavailable, and relayed a summary of the following information to Tom Bishop of his staff.)

Dr. Myers did not wish to provide copies of the documents to us that we had seen last Friday in his office. He preferred instead to orally identify the areas that he believed the NRC should look into. I believe that he felt that by defining the areas in broad enough terms, the identity of the alleged would be more protected than if he gave us the documents. He warned me that by passing this information on to me that I now shared a personal responsibility for protecting the identity of the alleged and that if, as a result of our investigation of these issues, the identity of the alleged is made known that the responsibility for that compromise rested with me. He then outlined the following nine areas of inquiry that he believes the NRC should investigate.

1. Review all new conformance reports concerning the purchase of material from non-approved vendors over the last 2 or 3 years. Check all purchase orders against approved vendor lists.

2. Review all NCR's vs DCN's and check the disposition thereof. Look at PG&E's DCN's vs the Foley and Pullman Companies' DCN's for discrepancies.
 3. Provide a description of deviations over the past 2 years in DCN's and revisions thereto regarding the control room pressure and ventilation system.
 4. Request all documentation from PG&E, Foley and Pullman regarding the upgrading of materials from non-essential to essential.
 - 57 → 5. Check documentation to establish Foley and Pullman record on certification of inspectors. Review NCR's against inspector control prior to 1983. Note those NCR's and their disposition.
 6. Are there any NCR's on Redhead stud anchors?
 - 59 ✓ 7. Review inspection reports and NCR's by Foley and Pullman on testing 'of concrete and grout and the use of samples.
 - ✓ 8. Ask PG&E and Foley for all NCR's regarding wire traceability. Check work packages to determine if they clearly indicate the source of all wires.
 - 62 9. Ask for documentation establishing wire cable termination and pull test and inspections performed per Appendix B.
- Mr. Myers reiterated that he expected to hear from me within a few days with respect to the Agency's actions on these allegations.



Robert A. Purple, Deputy Director
Division of Licensing



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1950 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

CONFIDENTIAL

YES ☒
NO ☐

H. G. J.

SUMMARY OF SPECIAL INSP. -RELATED INFORMATION

ABLO CANYON

Diablo Canyon Concerns

COPY

MEETING
INTERVIEW ☒
TELEPHONE CALL
COLLECT () YES () NO
OTHER

DATE 1/12/84	TIME INITIATED ~ 3:00p	TIME ~ 3:00p
PARTICIPANTS NAME Leonard Price (Electrical Inspector)		ORGANIZATION Foley
LOCATION Diablo Canyon site		YES ON SITE 8 months
CALLED NO.		CALLING NO.

QUESTION: ARE YOU, OR ARE YOU AWARE OF, IMPROPER MANAGEMENT PRESSURES TO "CUT CORNERS" (i.e. sacrifice safety to meet schedules, etc)?

Reply: No. — Except that he doesn't believe that the procedure for checking anchor bolt angle is proper. They check the installed bolt but should check the hole angle instead. *JOHN FAIR IS HANDLING THIS ISSUE.*

2. Question: Do you feel intimidated or for any reason do you have reservations about bringing quality concerns to the attention of your management, PG&E or the NRC?

Reply: Yes. Worries about Wilson but has not let it stop him from identifying problems. When Wilson fired Pete Masoros it pretty much stopped everyone from writing up any problems for a few days.

3. Do you have other concerns?

Reply: There are problems with drawing control & weld symbols. Changes come thru that change revisions that aren't out.

Note: I brought Phil Morrill (NRC PV) to talk to him (Price) about drawing problems. (OVER)

INTERVIEWED BY *E.H. Girard* DATE *1/13/84* PAGE *1* OF *1*

4. You knew Ivan Vines. Do you know how to contact him?

Reply: Yes. Price furnished telephone number, on 1/13/84

801-864-4337

5. Do you have any concerns that you think would affect the future safe operation of the plant?

Reply: No.

Previous EXPERIENCE:

Deablo Canyon electrical inspector since 4/35

Piping - inspector at Sealbrook 1/83 - 4/83

" " at Fermi 2/80 - 4/82

COPY

NRC out

Bkdg for
A 11-59-57
82-8224READ & INITIAL
PROJ SUPT
ENGINEERS

July 14, 1981

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-275
Docket No. 50-323
Diablo Canyon Units 1 and 2

Dear Mr. Eisenhut:

Subject: Qualification of Inspection,
Examination and Testing and Audit Personnel

Your letter dated May 4, 1981 requested that we furnish commitments to meet regulatory positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1, and Regulatory Guide 1.146, and our planned date for meeting these commitments.

We will comply with Positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1 and ANSI N 45.2.6 - 1978 with the following exceptions: Our plant quality control inspectors and personnel performing leak-rate testing, including that required by 10 CFR 50, Appendix J, will not have the three levels of qualification. As specified in the NRC interpretation of Regulatory Guide 1.58 issued April 7, 1977, personnel performing inspection, examination, and testing functions associated with normal operations of the plant such as surveillance testing, maintenance, and certain technical reviews normally assigned to the plant staff will be qualified to ANSI N 18.1 - 1971. These requirements will be fully implemented by the date that Unit 1 is issued a full power operating license.

~~8107200316~~

2 p.

53.

Mr. Darrell G. Eisenhut

- 2 -

July 14, 1981

We will fully comply with Regulatory Guide 1.146 dated August, 1980. The requirements of this guide will be in place by the date that Unit 1 receives a full power operating license.

We responded previously to these questions on January 22, 1981 and March 18, 1981. The March 18, 1981 response was updated per discussions with the NRC Staff.

Very truly yours,

Philip A. Crane, Jr.

RCHowe/PAC:ls
CC: Service List

bcc: Diablo Distribution



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

066 W

READ & INDEX
FILED
ENGINEERS
CIVIL
ELECT
MECH
ES
STARTUP
QC
ACCTG.
FCS
PMS

May 4, 1981

TO ALL LICENSEES OF OPERATING PLANTS AND HOLDERS OF CONSTRUCTION PERMITS

Gentlemen:

SUBJECT: QUALIFICATION OF INSPECTION, EXAMINATION, AND TESTING AND AUDIT
PERSONNEL (Generic Letter 81-01)

Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50 establishes overall quality assurance requirements for nuclear power plants. Two Regulatory Guides, discussed below, have been issued which provide guidance on an acceptable way to meet Appendix B requirements. Enclosed for your information and use is a copy of Regulatory Guide 1.58, Revision 1, dated September 1980, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel." Regulatory Guide 1.58 endorses ANSI N45.2.6 with certain exceptions. The NRC staff has determined that the intent of regulatory positions C.5, 6, 7, 8 and 10, which provide additional guidance concerning the qualification of nuclear power plant inspection, examination, and testing personnel, should be implemented by all operating nuclear plants and those under construction.

Also enclosed for your information and use is a copy of Regulatory Guide 1.146, dated August 1980, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants." This guide endorses ANSI/ASME N45.2.23-1978 with certain exceptions. The NRC staff has determined that the intent of this guide should be implemented by all operating nuclear plants and those under construction.

Therefore, you are requested to furnish the following by 90 days from the date of this letter:

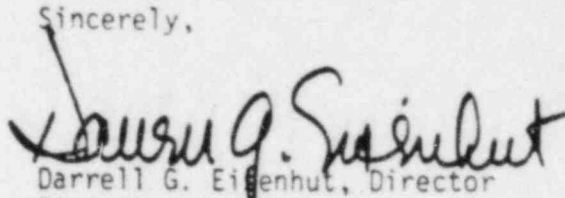
1. Commitments to meet regulatory positions C.5, 6, 7, 8, and 10 of Regulatory Guide 1.58, Revision 1, and Regulatory Guide 1.146, and your planned date for doing so; or
2. If you elect not to adopt the methods given in Regulatory Guides 1.58, Revision 1, and 1.146 describe your alternative methods of complying with 10 CFR Part 50, Appendix B regarding qualification of nuclear power plant inspection, examination, and testing personnel, and qualification of audit personnel, and your schedule for implementing the alternative methods.

~~8106020005~~ 2pp

In your response please refer to this letter by title and number.

Any questions regarding this matter may be addressed to your project manager.

Sincerely,


Darrell G. Eisenhower, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Regulatory Guide 1.58, Revision 1, dated September 1980
2. Regulatory Guide 1.146, dated August 1980

cc: Service List

bcc: CPUC Applications 49051 and 50028 (Diablo Canyon Units 1 and 2)
bbcc: Diablo Distribution

bcc: CPUC Application No. 41212 (Humboldt Bay Power Plant Unit No. 3)
bbcc: Humboldt Distribution

NOTE: MR. J. B. HOCH - Please prepare reply

NOTE: MR. J. D. SHIFFER - Please prepare reply

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-275/83-32

Docket No. 50-275

License No. DPR-76

Safeguards Group _____

Licensee: Pacific Gas and Electric Company

77 Beale Street

San Francisco, California 94106

Facility Name: Diablo Canyon Unit 1

Inspection at: San Luis Obispo County, California

Inspection conducted: October 3-7, 1983

Inspectors: E. M. Garcia
E. M. Garcia, Radiation Specialist

11/22/1983
Date Signed

Approved by: F. A. Wenslawski
F. A. Wenslawski, Chief
Radiological Safety Branch

11/23/83
Date Signed

Summary:

Inspection on October 3-7, 1983 (Report No. 50-275/83-32)

Areas Inspected: Routine unannounced inspection by a regionally based inspector following up on unresolved items and other follow-up items identified in inspection reports 50-275/80-04, 50-275/81-16, 50-275/83-09, and 50-275/83-22. These items deal with incomplete preoperational tests, implementation of NUREG-0737 Items II.B.3 and II.F.1, and calibration of FSAR identified radiation monitors. The inspection also followed up IE Information Notices, Licensee Event Reports, Allegation Number RV-83-A-0018, and licensee preparation for 10 CFR 61 compliance. This inspection involved 42 hours onsite by one inspector.

Results: Of the nine areas inspected no items of noncompliance were identified.

8312120165

12

The inspector observed the location where the source was found and interviewed the cognizant licensee staff. The inspector reviewed the licensee's radiological evaluation of these events. The evaluation concluded that a significant health hazard was not likely as a result of misuse of these sources.

No items of noncompliance were identified. (50-275/83-03-LO, Closed)

9. Follow up on Allegation Number RV-83-A-0018

This allegation expresses three areas of concern. These are:

1. Licensee's Health Physics personnel are not qualified to American National Standard Institute (ANSI) requirements.
2. The licensee has poor practices as far as keeping exposures as low as reasonably achievable (ALARA).
3. Modifications to the Air Ejector Discharge Radio-Gas Monitor (RE-15) and Gas Decay Tank Discharge Radio-Gas Monitor (RE-22) have made these monitors insensitive to Xenon-133 and Krypton-85.

Regarding the first issue the applicable ANSI standard is N18.1-1971, Standard for Selection and Training of Personnel for Nuclear Power Plants. Technical Specification 6.3, Unit Staff Qualifications further requires that the Supervisor of Chemistry and Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

The qualifications of the Supervisor of Chemistry and Radiation Protection and his alternate were reviewed by NRR in February 1981 and found to meet both the ANSI standard and Regulatory Guide 1.8, September 1975. The individuals involved have had experience at another Nuclear Facility and have been involved in the development of Diablo Canyon since its inception.

The licensee's program for reviewing the unit staff experience and qualifications to meet the ANSI N18.1-1971 standard were reviewed. Records of selected individuals were examined. The records reviewed indicate that the licensee has a program for determining whether an individual has the required experience. The inspector noted, however, that for Chemistry and Radiation Protection Technicians the licensee considers that two years experience in chemistry, radiation protection, or a combination of both meets the standard for this position. The licensee was informed that although it was not clear that their interpretation of required experience is correct, it is the licensee's responsibility to insure that technicians in responsible positions are qualified to do the job. Region V will seek from NRR clarification of the ANSI 18.1-1971 experience requirement as it applies to the licensee's Chemistry and Radiation Protection technicians. The inspector will follow up on this issue (50-275/83-32-01, open).

In regards to the second general concern, the individual gave three examples of what he (she) felt were poor practices in the ALARA program.

The first example is that air from the chemistry laboratory is only exhausted by means of the fume hoods and that this is inadequate. The inspector toured the laboratory and noted that there is an additional room exhaust besides the two fume hoods. Also, a 1981 report by the licensee's corporate industrial hygienist measured 16 room air changes per hour considering only the air removed by the fume hoods. The minimum recommended room air changes per hour is 10. Further, the licensee has a Design Change Request (DCR) for adding a fume hood over sink, and thus further increasing the number of air changes.

The second example of poor ALARA practices given by the individual concerned is that the licensee intends to permit all floors in the restricted area to become contaminated. Whether or not floors will be allowed to become contaminated can not be clearly determined until the plant is operational. In interviews with the Supervisor Chemistry and Radiation Protection and the C&RP Engineer responsible for Operation Health Physics the licensee indicated that they intend to keep hallways "clean" and to control the spread of contamination by the use of step-off-pads. Statements in Radiation Control Procedures G-4 and G-5 substantiate the licensee's intent.

The third example of poor ALARA practices given by the individual concerned is that the licensee will not provide respirators to workers when they want one. This situation would arise when the radiation work permit does not require a respirator but the worker insists on having one.

Licensee's radiation control procedure G-9, "Use of Respiratory Equipment for Protection Against Airborne Radioactive Materials" establishes prerequisites for use and selection of respiratory equipment. Prior to using respiratory equipment each individual must have a physical examination, be trained and fitted with the type of respiratory equipment to be used. Selection of type of equipment to be used is made by the Radiation Protection staff. The procedure does not address the question of providing respirators on demand. In interviews with the Supervisor C&RP and with the CR&P Engineer responsible for respiratory protection, they stated that if after explaining to the individual why a respirator was not needed for a particular task if the worker insisted, and was qualified, a respirator would be provided.

The third general area of concern deals with modifications to the Air Ejector Monitor, RE-15, and the Gas Decay Tank Discharge Monitor, RE-22, making these monitors insensitive to Xe-133 and Kr-85.

RE-15 is in a hostile environment, high humidity and temperature. RE-22 monitors what may be relative high concentrations of an undiluted stream. The licensee procured environmental shields from the manufacturer of these monitors to protect them from the hostile environment, and to decrease the sensitivity, respectively. The manufacturer has provided

the licensee with analysis of responses for Xe-133 and Kr-85 for these monitors. As expected the beta emissions from these radionuclides is completely shielded by the environmental shields. However, the gamma emissions (514 Kev for Kr-85 and 80 KeV for Xe-133) penetrate the shield and are detected by the monitor. The licensee intends to verify the vendor's response curves when the plant is operational.

No items of noncompliance or deviations were identified.

10. Licensee Preparation for 10 CFR 61 Compliance

On December 27, 1983 the new Part 61, Licensing Requirements for Land Disposal of Radioactive Waste, becomes effective. NRC is attempting to determine if licensees are aware of, and are making preparation for compliance with 10 CFR 61. Copies of the final rule with a fact sheet and a branch technical position were mailed to licensees on February 11 and May 11, 1983, respectively. Pacific Gas and Electric is aware of the requirements of 10 CFR 61 and is developing specific procedures to effect compliance. The guidance provided in the documents described above is being used in developing the procedures. A Chemistry and Radiation Protection Engineer with experience in radioactive waste programs has been hired and placed in charge of developing the licensee's program.

No items of noncompliance or deviations were identified.

11. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance or deviations. Paragraphs 4.b, 4.c and 5 discussed previously identify unresolved items. These items have been found to be acceptable. No new unresolved items have been identified and none of the previously identified unresolved items have resulted in noncompliance or deviations.

12. Exit Interview

The inspector met with individuals denoted in paragraph 1 at the end of the inspection. The scope and findings of the inspection were presented. Specific areas discussed are described in paragraphs 2 through 10. The licensee was informed that no items of noncompliance were identified.

ROUTING AND TRANSMITTAL SLIP

Date 12/23/82

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Frank		
2.		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Attached are copies of memos, etc sent over by Doug Collins. Note especially p. 3 of his memo to staff. I believe he still intends to draft a memo to specifically address your question.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Jay	Phone No.

5041-102

U.S. GPO: 1980-241-622/20

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

Problem Statement

Allegation #(s): 3-8 (3, 4, 5, 6, 6a, 7, 8)

ATS No.(s): NRR 83-02

BN(s): BN 83-03 1/7/83

This document lists (or directly references) each allegation or concern brought to the attention of NRC personnel. The purpose of this statement sheet is to assure that all points raised by the allegor are covered.

If the problem statement is not clear as to who, what, where, when, or why regarding the issue, the commentary section will amplify the statement. The commentary section will also be used if there is apparent conflicting information or if there is no or very little original information available which describes the concern(s). (This can occur if, for example, a line concern was received in an interview).

Problem Statements (use extra sheets as necessary)

Allegation#

Verbatim Statement or Reference

3-8

Issued in SSER16

all of these items are the responsibility
of NRR

Source (Mr Smith 1/83)

3. Seismic Qualification CCW
4. Single Failure Capability CCE
5. Heat Removal Capability CCW -
6. I&C Design Classification
- 6a. Feedwater Isolation Classification
7. Seismic Category I/Category II Interface
8. Seismic Design of Diesel Gen. I and Exh.

Commentary

The enclosed no document NRR 83-02 was
supplied to RI for info. and entered into
our system on 3-2-84

Date This Statement was Completed

3-16-84

Technical Reviewer Signature
Technical Reviewer Signature

ENCLOSURE 2
DIABLO CANYON - ALLEGATION & INVESTIGATION SUMMARY

ALLEGATION
NUMBER

DESCRIPTION AND ASSIGNMENT
CURRENT STATUS

N.A.
NRR-83-02
NRR

An anonymous person met with NRR personnel and alleged design deficiencies in the Component Cooling Water system. NRR had lead responsibility. This item was closed out by Supplement 18 to the Safety Evaluation Report (SER).

N.A.
GH
Done-

An NSC Audit of PG&E in 1977 (apparently very critical of Pullman construction work) was introduced by the Governor's representatives on a motion to have construction Quality Assurance hearings. Region V is assigned responsibility to follow-up. The audit and the PG&E response have been examined. Remaining open issues are being examined at the site October 11-14, 1983. The Region V staff does not feel the NSC audit changes the position previously taken by Region V.

275/83-34

N.A.
NRR has
lead

Allegations of welding and quality assurance deficiencies in "super-strut" material, were initially followed-up by Region V to verify adequate implementation of quality assurance programs and regulatory requirements by the licensee. NRR has responsibility to close remaining design issues with a supplement to the SER and to inform Region V if any additional requirements are to be placed on "off-the-shelf" material.

N.A.
NRR-83-04
NRR has
lead

Eight anonymous allegations regarding design were forwarded by the intervenors' attorney to NRR in May 1983. NRR has repeatedly attempted to talk to the allegor, with no success. NRR has the responsibility to close this issue out, possibly with a supplement to the SER.

83-18
Wenslawski

An ex-licensure employee alleged that health physics personnel were not qualified to ANSI requirements, the ALARA program was a paper tiger, and some radiation monitors were not sensitive enough. Region V radiation protection inspection staff has the responsibility to follow-up and close-out (if appropriate) these items.

83-28
and

A licensee contractor employee alleged there were deficiencies in the use of "red-head" anchors for

83-33

*M. Mendonca
still open.
mail - done
but not
prepared.*

raceway supports, and that the Foley company was not documenting non-conformance reports issued by field inspectors. The Region V examination of these allegations has resulted in a licensee technical evaluation of the "red-head" anchors, and changes to the Foley procedures to insure all NCRs are documented and dispositioned. These issues will be expected to be closed out in routine Region V inspection reports.

83-34

*discuss from
system
action*

On September 7, 1983, during the readiness for operations meeting, Ms. S. Silver of the Mothers for Peace raised five issues. These items have been identified to all parties in the NRC meeting minutes. Follow-up responsibility of these items has not been assigned.

83-38

A representative of Governor's received and forwarded anonymous allegations regarding inadequate electrical circuit pull records to NRR. Lead responsibility has been transferred to Region V. This item is scheduled for resolution by October 19, 1983. It is likely that this schedule will slip by two to four weeks due to lack of inspection resources.

83-39

OI

Mr. C. Nieburger, a member of the staff of the San Luis Obispo Telegram-Tribune, informed the Resident Inspector that he had received allegations that welder qualifications could be purchased. The matter was transferred to the Region V field office of the Office of Investigation on October 13, 1983 to follow-up this item as it related to Diablo Canyon.

83-41

*RV resp. items
2/7*

NRR

An unsigned letter alleging errors in design and documentation of the Diablo Canyon project (apparently written by project personnel) was received by the Region V office on October 12, 1983. Lead responsibility was transferred to NRR on October 12, 1983.

83-42

Merwin

Subsequent to the readiness for operations meeting on September 7, 1983, Ms. S. Silver of the Mothers for Peace, expressed a second-hand allegation regarding pitting of the main steam and feedwater piping. This issue has been verified to be true by the Resident Inspector who has been in contact with Ms. Silver and has obtained a commitment from the licensee to complete and engineering evaluation of the pitting problem. This item is expected to be closed out in a routine Region V inspection report.

*RV 83-46
NRR 83-47*

Cooper.

Task: Allegation or Concern No. 7

ATS No.: NRR-83-02

BN No.: 83-03 (1/7/83)

Characterization:

PG&E failed to conduct an adequate program to prevent adverse interaction of Seismic Category II structures and equipment with seismic Category I structures and equipment.

Implied Significance to Plant Design, Construction, or Operation

If as alleged PG&E did not have a clear understanding of the scope of the targets and commitments to the NRC in the Seismically-Induced Systems Interaction Program (SISIP), then the misunderstanding might be significant to operation of equipment important to safety. At Diablo Canyon "Targets" refers to selected set of structures, systems and components that are important to safety and serve to either bring the plant to safe shutdown or maintain it in safe shutdown condition. A misunderstanding of the scope of the targets might affect the capability to safely shutdown the plant following the occurrence of a Hosgri event.

Assessment of Safety Significance

At the request of the Advisory Committee on Reactor Safeguards (ACRS) PG&E agreed to initiate a program to determine if seismically initiated failure of non-seismically qualified equipment and piping would cause interaction with safety-related systems which could prevent the plants from being safely shutdown following the occurrence of a Hosgri event.

PG&E, by letters dated May 7, July 1, July 15, August 19, and September 16, 1980, submitted drafts of their proposed program to the NRC staff for review and comment. The degree of PG&E's understanding including many details, e.g., target selection criteria, application of the target selection criteria,

unknown
Date
Probably Dec 84
ALE
What was the allegation?
The staff position
address whether
PG&E
the misunderstanding
the targets &
commitment
that
way the
allegation?

source identification criteria, application of source identification criteria, source-target interaction criteria, application of the source-target interaction criteria analysis for the resolution of postulated interactions, and the resolution of postulated interactions by plant modifications were contained in their draft program. These drafts were reviewed and comments submitted to PG&E as guidance for their use in improving their program. These reviews were described in Sections 2 through 5 of Supplement No. 11 to the Safety Evaluation Report (NUREG-0675, Supplement 11).

The staff performed an onsite audit of the program activities (reported in Sections 6 and 7 respectively of Supp 11). Although the audit did not include a 100% review of PG&E's target list, it did include sufficient review to provide confidence that the list reflected the actual plant systems, components, structures and layout.

By letter dated October 13, 1983, PG&E submitted an information report on the status of their seismic systems interaction study within the containment of Unit 1. Included in the Information Report was the preliminary status of their study of Unit 2. PG&E has not yet completed its study of Unit 2 and the staff has not yet completed its review. However, the staff has not yet identified any misunderstanding of the original scope of the targets and commitments to the NRC in the PG&E program. In fact, there has been even more detailed understandings attained and more voluntary commitments made to the NRC. Therefore, the extent to which we have communicated with PG&E provides reasonable assurance that PG&E understands the scope of the targets and the commitments made by PG&E to the staff. The commitments are documented in

Section 8.2, Supplement 11 to NUREG-0675 (SER):

- (a) "PG&E will complete their program and any necessary plant modifications for each unit prior to the issuance of any license authorizing full-power operation of that unit."
- (b) Region V, OIE, will verify "the completion of PG&E's program and the acceptability of any plant modifications."
- (c) "PG&E will ...provide for our information copies of their final report of their program which will include and identification of all interactions postulated, all walkdown data, interaction resolution, and technical reports."

Staff Position

Based upon (a) the degree of understanding between the staff and PG&E which includes many details documents in Supplement 11, NUREG-0675 and reinforced by extensive informal communication, and (b) the ongoing review of preliminary results, the staff has no basis to conclude that PG&E misunderstands the scope of the targets and their commitments to the NRC.

Action Required

No new action is required in response to this allegation. The ongoing review will continue to take steps to assure that no misunderstandings occur which might be significant to the safe operation of Diablo Canyon.

Task: Allegation or Concern No. 5

ATS No.: NRR 83-02

BN No.: 83-03 (1/7/83)

Characterization

A concern was raised that with all redundant essential heat loads imposed on the component cooling water system (CCWS) following a loss of coolant accident (LOCA), the CCWS could not remove sufficient heat to maintain the design maximum CCWS temperature and assure a safe shutdown. This is because only one CCW heat exchanger is normally on line and operator action could not be taken soon enough to align the normally isolated redundant CCW heat exchanger prior to exceeding the allowable CCW temperature.

Action Required

No further action required on this allegation - refer to SSER 21

THE M. W. KELLOGG COMPANY

POWER PIPING

A Division of TULLAMAH INCORPORATED

Diablo Canyon

SPECIFICATION CHANGE NOTICE

No. 6

Date 6/15/76

E.S.D. Number 215

Page Paragraph(s) see below

Title: visual inspection

TO: Pacific Gas and Electric Co.

The above specification has been changed as follows:

PAGE 4 Para. 5.6 changed to clarify visual aid peepholes

VOID

APPROVED:

[Signature]
M.V.K. Q.A./Q.C. Manager

[Signature]
P.G. & E. Engineer
and AG Weather per
conv. with MRT on 6/3/76

Reason or Justification for Change: (Fill in when not obvious from above)

FOR INFORMATION ONLY

Change Number to be assigned consecutively under each specification.

ALLEGATION DATA FORM
Instructions on reverse side

U.S. NUCLEAR REGULATORY COMMISSION

RECEIVING OFFICE

1. Facility(ies) Involved:

(If more than 3, or if generic, write GENERIC)

(Name)

Diablo Canyon 1

Diablo Canyon 2

Docket Number (if applicable)

050 00275

050 00323

2. Functional Area(s) Involved:

(Check appropriate box(es))

☐
☐
☐
☐

operations

construction

safeguards

other (Specify) _____

☒
☐
☐

onsite health and safety

offsite health and safety

emergency preparedness

3. Description:

(Limit to 100 characters)

HP PERSONNEL NOT QUAL TO
ANSI REAS. ALARA PROGRAM A
PAPER TIGER CERTAIN RAD
MONITORS NOT SENSITIVE

4. Source of Allegation:

(Check appropriate box)

☐
☐
☐
☐
☒

contractor employee

licensee employee

NRC employee

organization (Specify) _____

other (Specify) Ex-licencee employee☐
☐
☐

security guard

news media

private citizen

5. Date Allegation Received:

MM DD YY

05 19 83

6. Name of Individual
Receiving Allegation:

(First two initials and last name)

M. H. Malmros

7. Office:

RV

ACTION OFFICE

8. Action Office Contact:

(First two initials and last name)

F. Wenslawski

9. FTS Telephone Number:

463-3757

10. Status:

(Check one)

☒
☐

Open, if followup actions are pending or in prc

Closed, if followup actions are completed

11. Date Closed:

MM DD YY

11 23 83

12. Remarks:

(Limit to 50 characters)

SEE INSPECTION REPORT
50-275/83-32 PPRPGRAH 9

12.1 Man-hours/Date

13. Allegation Number:

Office

Year

Number

RV-83-A-0018

Allegations
20, 21

Task: Allegation or Concern No. 20

EG /JM
Final
FILE COPY

ATS No: RV-83-A-018

BN No: N/A

Characterization:

Licensee's Health Physics personnel are not qualified to American National Standard Institute (ANSI) requirements.

Implied Significance to Design, Construction or Operation

This concern does not have any implied significance to Design or Construction of the facility. It does have implied significance to Plant Operations. Failure to have adequately qualified Health Physics personnel could adversely affect the licensee's ability to implement a quality radiation protection program.

Assessment of Safety Significance

The NRC staff approach to resolving this issue was to examine the applicable Technical Specification and related standards; to review the licensee's implementation of these requirements; and to assess the licensee's compliance in assuring requisite qualifications of Health Physics personnel.

The licensee's Technical Specification 6.3.1 requires that each member of the Health Physics staff shall meet or exceed the minimum qualifications of ANSI standard N18.1-1971 except for the Supervisor of Chemistry and Radiation

Protection who shall also meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

The NRC staff has reviewed the qualifications of the Health Physics staff and found them to be adequate and in conformance with requirements. The qualifications of the Supervisor of Chemistry and Radiation Protection and those of his alternate were reviewed by the Office of Nuclear Reactor Regulation (NRR) in February 1981 and found to meet both the ANSI standard and Regulatory Guide 1.8, September 1975. The individuals involved have had experience at another reactor facility and have been involved in the development of the radiation protection program at Diablo Canyon since its inception.

The licensee has a program for reviewing the qualifications of the Health Physics staff to insure that the ANSI N18.1-1971 requirements are met. Region V has reviewed this program and found it to be adequate. However an issue was identified regarding the experience requirements as it applies to Chemistry and Radiation Protection technicians. Section 4.5.2 of the ANSI standard states "technicians in responsible positions shall have a minimum of two years of working experience in their specialty." Chemistry and Radiation protection could be considered to be two separate specialties. The licensee, however, considers that a combined total of two years experience meets the intent of the ANSI standard. NRC has not specifically developed a position addressing whether 2 or 4 years of experience are appropriate for the disciplines of chemistry and radiation protection combined as a single specialty. There is precedent for both interpretations.

Staff Position

Region V concludes that the licensee's professional Health Physics staff meet the requirements of the Technical Specification. Notwithstanding the ANSI standard, the licensee intends to use only qualified technicians to fill responsible positions. The issue of the required number of years of experience for Chemistry and Radiation Protection technicians will be pursued on a generic basis by Region V.

Action Required

No further action is required relative to the specific allegation.

Region V submitted a request of guidance on the required experience for Chemistry and Radiation Protection technicians to the Office of Inspection and Enforcement (IE) on December 2, 1983. This issue has generic implications and needs to be reviewed in that light.

Problem Statement

Allegation #: 20

ATS No.: RV-83-A-0018

BN: N/A

This document lists each allegation or concern brought to the attention of NRC personnel. The purpose of this statement sheet is to assure that all points raised by the allegor are covered.

If the problem statement is not clear as to who, what, where, when, or why regarding the issue, the commentary section will amplify the statement. The commentary section will also be used if there is apparent conflicting information or if there is no or very little original information available which describes the concern(s). (This can occur if, for example, a line concern was received in an interview).

Problem Statements

Allegation

Verbatim Statement or Reference

20

This concern together with those described in allegations 21, and 22 were presented to Mike Malmros, former senior resident inspector at Trojan Nuclear Power Plant. The concerns were expressed by a former Pacific Gas and Electric, Co. employee. The identity of this individual is not known to the reviewer. These concerns appear to have made more as a casual comment and were not intended as a formal allegation. They can be viewed to be similar to statements made by an employee at an "exit interview" (an interview performed when an individual ceases employment with a company).

These concerns were made to Mike Malmros some time before May 19, 1983. Malmros first conveyed these comments to the reviewer by telephone, and after the urging of the reviewer Malmros submitted the attached Allegation Data Form.

The specific concern was that the Health Physics staff at Diablo Canyon Nuclear Power Plant was not qualified to do their job. The individual mention specifically as not qualified are Jerry Boots, Bill O'Hara, Dale Clifton, and Paul Lyon. He (She) stated that Paul Lyon only had experience at Diablo Canyon and therefore was not ANSI qualified. The other individual only had experience at

Humbolt and Diablo Canyon. However, he (she) felt that Henry Fong and Alex Taylor were very well qualified.

Date This Statement
was Completed 3/15/84

Enricho M. Garcia
Technical Reviewer Signature

Task: Allegation or Concern No. 21

FILE COPY

ATS No: RV-83-A-018

BN No: N/A

Characterization

The licensee has poor practices as far as keeping internal exposures to radioactive materials as low as reasonably achievable (ALARA). Specifically, (1) the air in the chemistry laboratory is only exhausted by means of the fume hoods and this is inadequate; (2) the licensee intends to permit all floors in the restricted area to become contaminated; (3) the licensee will not provide respiratory protection equipment to workers any time the workers want it.

Implied Significance to Design, Construction or Operation

These concerns do not have any implied significance to construction of the facility. The first concern implies that the proper air exchange was not considered when the chemistry laboratory was being designed. All three concerns have implications for proper operation of the facility. Poor practices in the respiratory protection program could lead to unnecessary internal exposure to radioactive materials.

Assessment of Safety Significance

The NRC staff's approach to resolving this issue was to review the licensee's procedures; to examine the chemistry laboratory; and to interview the cognizant licensee staff.

NRC's review of this matter found no basis to indicate the existence of unacceptable ALARA conditions or practices. (1) The fume hoods are not the only means of air exchange for the chemistry laboratory. Also, considering only the effect of the fume hoods, the number of air changes per hour exceed the OSHA requirements. (2) Statements in the licensee's radiation control procedures indicate that corridors in the restricted area will not be permitted to remain contaminated, if they so become. (3) The licensee currently intends to provide respiratory protection equipment to individuals who demand their use, even if the radiological conditions do not require respiratory protection. Individuals will have to have been tested and trained on the specific equipment being used.

Staff Position

Region V concludes the specific concerns cited are not founded. In the inspector's opinion, the licensee is committed to a strong ALARA program. This commitment is reflected in statements in their procedures. The inspector notes, however, that the ultimate performance can't be clearly demonstrated until the plant is operational.

Action Required

No further action is required relative to the concerns expressed. Region V will review the licensee's implementation of their operational ALARA program through the routine inspection program.

Problem Statement

Allegation #: 21

ATS No.: RV-83-A-0018

BN: N/A

This document lists each allegation or concern brought to the attention of NRC personnel. The purpose of this statement sheet is to assure that all points raised by the alleged are covered.

If the problem statement is not clear as to who, what, where, when, or why regarding the issue, the commentary section will amplify the statement. The commentary section will also be used if there is apparent conflicting information or if there is no or very little original information available which describes the concern(s). (This can occur if, for example, a line concern was received in an interview).

Problem Statements

Allegation

Verbatim Statement or Reference

21

This concern together with those described in allegations 20, and 22 were presented to Mike Malmros, former senior resident inspector at Trojan Nuclear Power Plant. The concerns were expressed by a former Pacific Gas and Electric, Co. employee. The identity of this individual is not known to the reviewer. These concerns appear to have made more as a casual comment and were not intended as a formal allegation. They can be viewed to be similar to statements made by an employee at an "exit interview" (an interview performed when an individual ceases employment with a company).

These concerns were made to Mike Malmros some time before May 19, 1983. Malmros first conveyed these comments to the reviewer by telephone, and after the urging of the reviewer Malmros submitted the attached Allegation Data Form.

The specific concern is that Diablo Canyon has poor practices as far as keeping internal exposures to radioactive materials as low as reasonably achievable. The alleged gave three examples in which he bases his concern. (1) The air in the chemistry laboratory is only exhausted by means of the fume hoods and this is inadequate. (2) The licensee intends to permit all floors in the restricted area

9.

to become contaminated. (3) The licensee will not provide respiratory protection equipment to workers any time the workers want it.

Date This Statement
was Completed 3/15/84

Emilio M. Garcia
Technical Reviewer Signature

ALLEGATION DATA FORM

Instructions on reverse side

U.S. NUCLEAR REGULATORY COMMISSION

RECEIVING OFFICE

1. Facility(ies) Involved:

(If more than 3, or if generic, write GENERIC)

(Name)

Diablo Canyon 1

Diablo Canyon 2

Docket Number (if applicable)

050 00275

050 00323

2. Functional Area(s) Involved:

(Check appropriate box(es))

☐
☐
☐
☐

operations

construction

safeguards

other (Specify) _____

☒
☐
☐

onsite health and safety

offsite health and safety

emergency preparedness

3. Description:

(Limit to 100 characters)

HP PERSONNEL NOT QUAL TO
ANSI REAS. ALARM PROGRAM A
PAPER THER/CERTAIN RAD
MONITORS NOT SENSITIVE

4. Source of Allegation:

(Check appropriate box)

☐
☐
☐
☐
☒

contractor employee

licensee employee

NRC employee

organization (Specify) _____

other (Specify) Ex-licencee employee☐
☐
☐

security guard

news media

private citizen

5. Date Allegation Received:

MM DD YY

05 19 83

6. Name of Individual
Receiving Allegation:

(First two initials and last name)

M. H. Malmros

7. Office:

RV

ACTION OFFICE

8. Action Office Contact:

(First two initials and last name)

F. Wenslawski

9. FTS Telephone Number:

463-3757

10. Status:

(Check one)

☒
☐

Open, if followup actions are pending or in progress

Closed, if followup actions are completed

11. Date Closed:

MM DD YY

11 23 83

12. Remarks:

(Limit to 50 characters)

SEE INSPECTION REPORT
50-275/83-32 PPAFGLPMA 9

12.1 Man-hours/Date

13. Allegation Number:

Office

Year

Number

RV-83-A-0018