



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

OCT 1 1984

Docket No. 50-275

MEMORANDUM FOR: Hans Schierling, Project Manager, Licensing Branch No. 3,
Division of Licensing

FROM: I. T. Yin, Senior Mechanical Engineer, Engineering Branch,
Division of Reactor Safety, RIII

SUBJECT: SALP INPUT FOR DIABLO CANYON

Per your memo dated September 20, 1984, please find attached assessment for the SALP Board meeting for Diablo Canyon Units 1 and 2 currently scheduled on October 17, 1984.

I. T. Yin,
Senior Mechanical Engineer

Enclosure: As Stated

cc: J. G. Keppler

faxed 9/28

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PDR FOIA
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SALP Evaluation Diablo Canyon Unit 1, January 1, 1983 - June 30, 1984
NRR Activity: Piping and Support Review Effort
Prepared By: I. T. Yin, Engineering Branch, RIII
Overall Performance Category: 3

1. Management Involvement in Assuring Quality

Performance Category

3

Basis

The lack of licensee management concern of QA provision and implementation resulted in violation of just about all the NRC regulations applicable to piping design control including 10 CFR 50, Appendix B, Criteria 2, 16, 5, 3, 18, and 17.

2. Approach to Resolution of Technical Issues from Safety Standpoint

Performance Category

3

Basis

The approach to resolution of NRC identified significant technical issues resulted from its QA breakdown has been: (1) analyzing it away rather than improving the component design, (2) minimum in review and evaluation coverage, and (3) ignoring the possibility that similar problems could exist in other areas.

3. Responsiveness to NRC Initiatives

Performance Category

3

Basis

The licensee has not been responsive to the inspection findings. The common approach was to negotiate with the staff management rather than to resolve the noncompliance and issues with the inspector. Some of the corrective actions had been lacking in depth or unjustifiably compromised.

4. Enforcement History

Performance Category

-

Basis

No inspection or evaluation conducted.

5. Reporting and Analysis of Reportable Events

Performance Category

-

Basis

No inspection or evaluation conducted.

6. Staffing (Including Management)

Performance Category

3

Basis

There has been a severe shortage of site QA/QC personnel to ensure that piping design activities are in compliance with the NRC regulations and the established program provisions. The head of the Onsite Project Engineering Group, himself the former licensee site QA supervisor, ignored or bypassed many QA program requirements.

7. Training Effectiveness and Qualification

Performance Category

3

Basis

The general and special technical/QA training programs were inadequate. Procedure requirements had continuously been ignored. Site contractor design personnel had been working months without indoctrination or training using unapproved methods and reference materials.



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

October 3, 1984

MEMORANDUM FOR: G. W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

FROM: W. R. Butler, Chief
Containment Systems Branch
Division of Systems Integration

SUBJECT: SALP INPUT FOR DIABLO CANYON

The memorandum from H. Schierling of your branch, dated September 20, 1984, requested that we provide a SALP input for Diablo Canyon, specifically for the effort related to the allegations concerning debris from unqualified paints inside containment. The appropriate SALP input was attached to the memorandum transmitting our SER on this subject (Houston to Novak, dated June 29, 1984). A copy of that input is attached.

W R Butler

W. R. Butler, Chief
Containment Systems Branch
Division of Systems Integration

Attachment:
As stated

cc: R. Houston
T. Novak
H. Schierling

CONTACT: J. Pulsipher, CSB: DSI
x29483

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ENCLOSURE 2

SALP

prepared by the Containment Systems Branch

Evaluation Criteria	Category	Diablo Canyon, Units 1 and 2 Narrative Description
1. Management Involvement		N/A
2. Approach to Resolution of Technical Issues	2	The licensee has generally demonstrated understanding of the issues. Their approach was viable and sound from a safety standpoint.
3. Responsiveness	2	The licensee responded to NRC concerns in a positive and timely manner.
4. Enforcement History		N/A
5. Reportable Events		N/A
5. Staffing		N/A
7. Training		N/A

NRR Activity: Technical SpecificationsPrepared by: Fredric Anderson Branch: SSPBOverall Performance Category: 2⁺

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	2	Licensee management has been involved in the resolution of technical specification issues and has anticipated possible problem areas that would need resolution.
2. Approach to Resolution of Technical Issues from Safety Standpoint	1	Licensee has demonstrated a complete understanding for technical specification issues and has provided the requested information promptly.
3. Responsiveness to NRC Initiatives	1	Licensee has demonstrated exceptional cooperativeness and promptness in responding to technical specification issues and requests for additional information.
4. Enforcement History	N. A.	
5. Reporting and Analysis of Reportable Events	N. A.	
6. Staffing (Including Management)	2	Licensees by positions are identified and responsibilities are well-defined. Technical specification discussions between licensee and NRC are directed through several people which causes some confusion as to primary responsibility for licensee.
7. Training Effectiveness and Qualification	1	Licensee staff appears to have a superior knowledge of technical specifications and bases.

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NRR Activity: SEISMIC ASPECTS IN CIVIL/STRUCTURAL AREAPrepared by: H. POKR Branch: SGEB/DEOverall Performance Category: 2

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	2	Management seemed to be knowledgeable, to a very detailed level, of the workings of the analysis under review or discussion during the many meetings held during the relicensing of Unit 1
2. Approach to Resolution of Technical Issues from Safety Standpoint	2	management directed that resolutions meet the design criteria established for the project and seemed to be conscientious about addressing technical issues so that the safety margins of the plant were maintained.
3. Responsiveness to NRC Initiatives	2	MANAGEMENT responded quickly to request for information during audits and reviews. Seemed to be interested in providing information to answer staff questions.
4. Enforcement History		NO BASIS FOR EVALUATING
5. Reporting and Analysis of Reportable Events		NO BASIS FOR EVALUATING
6. Staffing (Including Management)	2	Organization and manpower levels seemed to be adequate for the particular job to be done.
7. Training Effectiveness and Qualification		NO BASIS FOR EVALUATING

Overall Performance Category: 2

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	2	Management responded satisfactorily when addressing safety issues by recognizing and remedying various defective design practices and insuring and supervising that proper procedures were carried out by design personnel.
2. Approach to Resolution of Technical Issues from Safety Standpoint	2	Licensee technical personnel addressed and resolved satisfactorily all technical concerns raised by the staff.
3. Responsiveness to NRC Initiatives	1	Licensee responded promptly to requests for information and resolution of issues.
4. Enforcement History	N/A	
5. Reporting and Analysis of Reportable Events	N/A	
6. Staffing (Including Management)	2	Staffing appeared to be adequate
7. Training Effectiveness and Qualification	2	Technical staff appeared to have adequate technical information and training for the performance of their work

NRR Activity: Equipment QualificationPrepared by: H. Walker Branch: EQBOverall Performance Category: 2

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	2	management involvement were evident, records generally complete, procurements generally well controlled and documented and reviews generally technically sound.
2. Approach to Resolution of Technical Issues from Safety Standpoint	2	While the approach to resolving technical issues are generally sound, there appeared to have been some difficulty in understanding some issues. However, from a safety standpoint the overall rating should be 2.
3. Responsiveness to NRC Initiatives	2	Generally, timely responses and acceptable resolutions were proposed, however there were one longstanding technical issue (Electro-hydraulic actuator) that were finally resolved.
4. Enforcement History		cannot make a judgement here.
5. Reporting and Analysis of Reportable Events	2	Events were accurately identified and corrective action taken.
6. Staffing (Including Management)		Cannot make a judgement here.
7. Training Effectiveness and Qualification		Cannot make a judgement.

SALP Evaluation Diablo Canyon Unit 1, January 1, 1983 - June 30, 1984

NRR Activity: IDVP (nonseismic design issues) and Component Cooling
Prepared by: J. Wermiel Branch: ASB Water System Design
Allegations

Enclosure 3

Note:
double input
IDVP & Alleg

Overall Performance Category: 2

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	2	Management involvement was strong initially in the IDVP and allegations reviews, but some degradation in quality of responses and licensee effort was noted later on.
2. Approach to Resolution of Technical Issues from Safety Standpoint	2	The licensee generally demonstrated an approach to resolution of technical concerns which indicated a knowledge of staff criteria and safety.
3. Responsiveness to NRC Initiatives	2	Responsiveness to staff concerns varied throughout the review process, but the licensee usually provided timely inputs.
4. Enforcement History	N/A	
5. Reporting and Analysis of Reportable Events	N/A	
6. Staffing (Including Management)	2	Reasonable app licensee manpower including the necessary management oversight was provided for resolution of IDVP and allegation concerns.
7. Training Effectiveness and Qualification	N/A	

NRR Activity: Allegations - Systems Interaction ProgramPrepared by: D. R. Lasher Branch: RRABOverall Performance Category: 1

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	1	Direct communication with the SISP Project Engineer and his Vice President was established which allowed the assessment of the allegations relative to the program to proceed effectively.
2. Approach to Resolution of Technical Issues from Safety Standpoint	1	Approach and understanding of the issues involved was demonstrated. Resolution of items was direct and conservative is - fix or modify the item rather than spend time and money analyzing it.
3. Responsiveness to NRC Initiatives	2	Technically sound and usually thorough, but not always timely responses made to NRC initiatives, however the occasional lack of timeliness may have resulted from the large number of items and other programs being handled by this licensee at the time.
4. Enforcement History	N.A.	No basis for assessment.
5. Reporting and Analysis of Reportable Events	N.A.	No basis for assessment.
6. Staffing (Including Management)	N.A.	No basis for assessment.
7. Training Effectiveness and Qualification	N.A.	No basis for assessment.

NRR Activity: BOLTED CONNECTIONSPrepared by: H. POLK Branch: SGEB/DEOverall Performance Category: 2

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	2	During meetings management at the plant site and the engineering office were prepared, involved and concerned that the bolts were shown adequate.
2. Approach to Resolution of Technical Issues from Safety Standpoint	2	The technical assessments of the bolting issues were adequately addressed as evidenced by the documentation and the prevailing standards used as well as the currently available literature and testing results.
3. Responsiveness to NRC Initiatives	2	The management was willing and eager to furnish material requested by the staff and to provide access into the plant which were subject to the allegations on bolting.
4. Enforcement History		NO BASIS FOR EVALUATING
5. Reporting and Analysis of Reportable Events		NO BASIS FOR EVALUATING
6. Staffing (Including Management)	2	The level of staffing including necessary management was adequate and evident during meetings and plant tours.
7. Training Effectiveness and Qualification		NO BASIS FOR EVALUATING

NRR Activity: UNQUALIFIED PAINT AND POST ACCIDENT SAMPLING SYSTEMPrepared by: FRANK J. WITT Branch: CHEMICAL ENGINEERINGOverall Performance Category: 1

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	1	During the review there was consistent evidence of fine planning and assignment of priorities
2. Approach to Resolution of Technical Issues from Safety Standpoint	1	The licensee exhibited technically sound and thorough approaches and resolved issues timely in almost all cases
3. Responsiveness to NRC Initiatives	1	The licensee met deadlines and presented technically sound responses in almost all cases
4. Enforcement History	NA	
5. Reporting and Analysis of Reportable Events	NA	Note: Dennis Kubicki provided SALP input with fire protection SER.
6. Staffing (Including Management)	NA	
7. Training Effectiveness and Qualification	NA	

Final evaluation Diablo Canyon Unit 1, January 1, 1983 - June 30, 1984

NRR Activity: PIPING & SUPPORT REVIEW EFFORT (LICENSING COND. #1 & 7 AND SDUP REVIEW) Enclosure 3

Prepared by: KAMAL MANOLY Branch: DEV. OF ENG. & TECH. PROG., REGION I

Overall Performance Category: 2

Evaluation Criterion	Performance Category	Basis
1. Management Involvement In Assuring Quality	2	PG&E MANAGEMENT EXHIBITED AN EVIDENCE OF PRIOR PLANNING, IN ADDRESSING THIS ACTIVITY; THE DECISION MAKING WAS USUALLY AT A LEVEL THAT INSURED ADEQUATE MGMT. REVIEW; PROCEDURES WERE GENERALLY WELL CONTROLLED; REVIEWS WERE TIMELY; COMMITTEES WHICH INTERFACED WITH NRC STAFF WERE PROPERLY STAFFED AND FUNCTIONING.
2. Approach to Resolution of Technical Issues From Safety Standpoint	1	CLEAR UNDERSTANDING OF TECHNICAL ISSUES WAS EVIDENT; CONSERVATISM ROUTINELY EXHIBITED IN DESIGN ACTIVITIES; VIABLE AND GENERALLY SOUND AND THOROUGH APPROACHES; AND TIMELY RESOLUTIONS, IN ALMOST ALL CASES. <u>NOTE: THE OVERLIDING FACTOR IN MAKING THIS ASSESSMENT IS SAFETY.</u>
3. Responsiveness to NRC Initiatives	1	THE LICENSEE'S STAFF WAS VERY RESPONSIVE TO NRC INITIATIVES REGARDING ABOVE ACTIVITY. RESPONSES PROVIDED TO THE NRC STAFF WERE GENERALLY ACCEPTABLE.
4. Enforcement History	N/A	CAN NOT DRAW A CONCLUSION REGARDING ENFORCEMENT HISTORY ON BASIS OF FOUR MONTH INVOLVEMENT IN DIABLO CANYON #1 LICENSING.
5. Reporting and Analysis of Reportable Events	1	THE LICENSEE WAS PROMPT IN REPORTING ANY FINDINGS OF SIGNIFICANCE WHILE ADDRESSING THESE LICENSING CONDITIONS. FINDINGS WERE THOROUGHLY IDENTIFIED & MONITORED.
6. Staffing (Including Management)	2	THE PERFORMANCE RATING IS BASED ON OBSERVATION OF STAFFING BEFORE AND AFTER THE LICENSING CONDITIONS. THERE WAS AN EVIDENCE OF IMPROVEMENT IN STAFFING DURING THE LAST FOUR MONTHS BEFORE THE FULL POWER HEARING, IN AUG. 84.
Training Effectiveness and Qualification	2	TRAINING AND QUALIFICATION EFFECTIVENESS WERE MORE EVIDENT IN THE LATTER STAGE. ADEQUATE UNDERSTANDING AND FAIR ADHERANCE TO PROCEDURES WAS EVIDENT WITH MODEST NUMBER OF ERRORS. IN ADDITION, DEFINED PROGRAMS WERE IMPLEMENTED FOR LARGE PORTION OF STAFF.

Prepared by: M. HARTZMAN Branch: MEBOverall Performance Category: 3

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	3	<p>and deficiency</p> <p>high performing and</p> <p>The error rate of pipe supports audits indicates that management did not adequately supervise the quality of the designs done by the design groups. (found during and reviews)</p>
2. Approach to Resolution of Technical Issues from Safety Standpoint	3	Management disregarded or did not consider as necessary certain technical design procedures important for safety design of piping and supports.
3. Responsiveness to NRC Initiatives	1	licensee responded promptly to requests for information and resolution of issues
4. Enforcement History	N/A	Not applicable
5. Reporting and Analysis of Reportable Events	N/A	Not applicable
6. Staffing (Including Management)	2	Staffing appeared to be adequate.
7. Training Effectiveness and Qualification	2	Technical staff appeared to have adequate technical information and training for the performance of their work.

NRR Activity: Piping and Supports Review EffortPrepared by: E. Sullivan Branch: TA/DE

Overall Performance Category: _____

Evaluation Criterion	Performance Category	Basis
1. Management Involvement in Assuring Quality	3	Although engineering design and construction was virtually always found adequate in our reviews, lack of PG&E management involvement resulted in frequent misuses of the "quick fix" and "Diablo Problem" programs and a high rate of minor design errors.
2. Approach to Resolution of Technical Issues from Safety Standpoint	1	PG&E exhibited a clear understanding of the technical issues and their safety significance. Responses were timely, sound and thorough in most cases. A typical example was the resolution of license condition 2.c.(11) item 4 on Thermal Gaps
3. Responsiveness to NRC Initiatives	1	PG&E was responsive in providing timely information at various stages in the resolution of the license conditions. PG&E was notably responsive in arranging well timed additional hot functional testing for NRC observation in connection with 2.c.(11) it
4. Enforcement History	—	No basis to rank
5. Reporting and Analysis of Reportable Events	—	No basis to rank
6. Staffing (Including Management)	—	No basis to rank
7. Training Effectiveness and Qualification	—	No basis to rank