

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD



In the Matter of )

PACIFIC GAS AND ELECTRIC COMPANY )

(Diablo Canyon Nuclear Power )  
Plant, Units 1 and 2) )

) Docket Nos. 50-275 O.L.  
50-323 O.L.

SUPPLEMENT TO JOINT INTERVENORS'  
MOTION TO REOPEN THE RECORD ON  
THE ISSUE OF CONSTRUCTION QUALITY ASSURANCE

Pursuant to the June 28, 1983 Order of this Appeal Board, the Joint Intervenors hereby submit two documents as a supplement to their May 10, 1983 Motion to Reopen the Record on the Issue of Construction Quality Assurance. The first is a June 23, 1983 Preliminary Notification -- PNO-V-83-22A -- which describes the discovery at Diablo Canyon that reactor coolant system piping in areas of ten welds may be less than the minimum wall thickness specified by code. The second is a Notice of Violation Concerning Reporting Requirements for Diablo Canyon, issued by the NRC to PGandE on June 24, 1983, based on PGandE's failure to report the discovery of minimum wall thickness violations within the 24-hour period prescribed by the Technical Specifications. Instead, PGandE waited almost five months to notify the NRC of the discovery.

Because both documents relate to the matter of construction quality assurance, they are plainly relevant to the

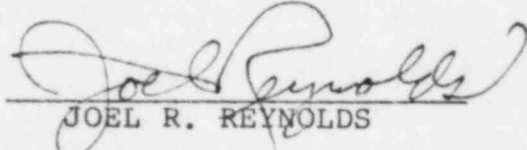
motions set for hearing in this proceeding on July 19, 1983.  
The Joint Intervenors intend to rely on the attached documents  
as further evidence that PGandE has failed to establish and  
implement an adequate construction quality assurance program  
that complies with regulatory requirements.

DATED: July 6, 1983

Respectfully submitted,

JOEL R. REYNOLDS, ESQ.  
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PRELIMINARY NOTIFICATION OF EVENT OR UNSURE OCCURRENCE THE PUS LEM 19 0000 07/20/83 10

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. The information is as initially received without verification or evaluation and is basically all that is known by IE staff on this date.

FACILITY: Pacific Gas & Electric Company  
Diablo Canyon Unit No. 1  
Docket No. 50-275  
San Luis Obispo County, California

SUBJECT: POTENTIAL VIOLATION OF MINIMUM WALL THICKNESS  
ON REACTOR COOLANT SYSTEM PIPING

Licensee Emergency Classification:

☐ Notification of Unusual Event  
☐ Alert  
☐ Site Area Emergency  
☐ General Emergency  
☒ Not Applicable

On June 22, 1983, licensee personnel determined that the RCS piping in areas of welds other than reported on May 10, 1983 may be less than the minimum wall thickness specified by code. A total of ten welds in cold leg, hot leg, and cross over (between steam generator and reactor coolant pump) piping appear to be less than required minimum wall thickness. The condition was discovered while performing additional ultrasonic examinations at each 45 degree increments around the welds. The tests were to be used to improve the quality of the base-line preservice examination. The licensee identified the additional problems after determining that incorrect minimum wall thickness criteria had been applied to the hot legs and cross over piping. All four RCS loops are involved. The reduction in wall thickness appears to have occurred during the original preservice examination (1975-76) when welds were ground smooth to remove the potential for irrelevant indications when performing ultrasonic and/or radiographic examinations. The licensee plans to take additional thickness measurements at 3-inch circumferential steps around the welds to determine if any other minimum wall thickness conditions exist.

Region V will closely follow this situation.

Media interest is not expected. Neither the licensee nor the NRC plans to issue a news release at this time. Region V (San Francisco) received notification of this occurrence from the Resident Inspectors at about 11:00 a.m. on June 23, 1983. This information is current as of 2:00 p.m. on June 23, 1983.

CONTACT: D. F. Kirsch  
463-3723

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REGION V: FORM 211  
(revised 3/14/83)

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

JUN 24 1983

Docket No: 50-275

MEMORANDUM FOR: Chairman Palladino  
~~Commissioner Gilinsky~~  
Commissioner Ahearne  
Commissioner Roberts  
Commissioner Asselstine

FROM: Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: NOTICE OF VIOLATION CONCERNING REPORTING  
REQUIREMENTS FOR DIABLO CANYON  
(Board Notification No. 83-83)

According to the procedures for Board Notification, the enclosed information is being transmitted directly to the Commission. The Boards and Parties are being notified by copy of this memorandum.

This information concerns a violation of NRC reporting requirements. The subject of the notice of violation was previously reported to you and was the subject of Board Notification 83-72.

*[Handwritten signature]*  
Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
As Stated

cc w/encl:  
See Next Page

8305110492

Contact:  
B. Buckley, NRR  
Ext. 28379

8305110492

cc: w/encl:

J. F. Wolf, ASLB

G. O. Bright, ASLB

J. Kline, ASLB

T. S. Moore, ASLAB

W. R. Johnson, ASLAB

J. H. Buck, ASLAB

SECY

OGC

OPE

EDO

Parties to Proceeding

DISTRIBUTION LIST FOR BOARD NOTIFICATION

Diablo Canyon Units 1&2  
Docket Nos. 50-275/323 OL

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Resident Inspector/Diablo Canyon NPS  
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Dr. Chester P. Siess  
Mr. David A. Ward





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE, SUITE 210  
WALNUT CREEK, CALIFORNIA 94596

JUN 17 1983

Docket No. 50-275

Pacific Gas and Electric Company  
77 Beale Street, Room 1435  
San Francisco, California 94106

Attention: Mr. J. O. Schuyler, Vice President  
Nuclear Power Generation

Gentlemen:

Subject: NRC Inspection of Diablo Canyon Unit No. 1

This refers to the routine inspection, conducted by Messrs. G. H. Hernandez and M. M. Mendonca of this office on May 23-June 6, 1983, of activities authorized by NRC License No. DPR-76 and to the discussion of our findings with Mr. R. C. Thornberry and other members of the Pacific Gas and Electric Company staff at the conclusion of the inspection.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A.

Your response to this Notice is to be submitted in accordance with the provisions of 10 CFR 2.201 as stated in Appendix A, Notice of Violation.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

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Pacific Gas and Electric Company

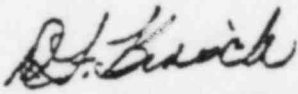
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JUN 17 1983

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

  
T. W. Bishop, Chief  
Reactor Project Branch No. 2

Enclosures:

- A. Notice of Violation
- B. Inspection Report  
Nos. 50-275/83-20

cc w/enclosure:

- G. A. Maneatis, PG&E
- P. A. Crane, PG&E
- S. D. Skidmore, PG&E
- R. C. Thornberry, PG&E (Diablo Canyon)
- R. D. Etzler, PG&E (Diablo Canyon)



APPENDIX A

NOTICE OF VIOLATION

Pacific Gas and Electric Company  
P. O. Box 7442  
San Francisco, California 94120

Docket No. 50-275  
Licensee No. DPR-76

As a result of the inspection conducted on May 23-June 3, 1983, and in accordance with NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violation was identified:

Technical Specification 6.9.1.11 states, in part, that ~~the~~ REPORTABLE OCCURRENCES of Specifications 6.9.1.12 and 6.9.1.13 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC..."

Technical Specification 6.9.1.12 lists the types of events which shall be reported by telephone within 24 hours to the Director of the Regional Office, or his designee, and confirmed by telegram, mailgram or facsimile no later than the first working day following the event, with a written followup report within 14 days.

Technical Specification 6.9.1.12.1 describes a type of event which shall be reported pursuant to Technical Specification 6.9.1.12 and states as follows:

"Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or Technical Specifications bases; or discovery during unit life of conditions not specifically considered in the safety analysis report or Technical Specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition."

Contrary to the above requirements, on December 17, 1982 the licensee identified that certain areas of Weld No. WIB-RC-2-17 were less than the minimum wall thickness specified by design and the applicable codes. Weld No. WIB-RC-2-17 is in Loop No. 2 of the Reactor Coolant System. This condition was not reported to the NRC until May 10, 1983.

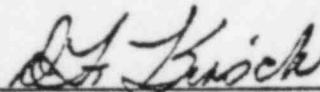
This is a Severity Level IV Violation (Supplement I).

8906210344

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

JUN 17 1983

Date



D. F. Kirsch, Chief  
Reactor Projects Section No. 3

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-275/83-20

Docket Nos. 50-275 License No. DPR-76

Licensee: Pacific Gas and Electric Company

77 Beale Street, Room 1435

San Francisco, California 94106

Facility Name: Diablo Canyon Unit No. 1

Inspection at: Diablo Canyon Site, San Luis Obispo County, California

Inspection conducted: May 23-June 6, 1983

Inspectors: *G. H. Hernandez* 6/17/83  
G. H. Hernandez, Reactor Inspector Dated

*E. M. Mendonca* 6/17/83  
E. M. Mendonca, Resident Inspector Dated

Approved by: *D. F. Kirsch* 6/17/83  
D. F. Kirsch, Chief, Reactor Projects Dated  
Section No. 3

Summary:

Inspection during the period of May 23-June 6, 1983 (Report No. 50-275/83-20)

Areas Inspected: Unannounced inspection by a regional and resident inspector of actions related to recent licensee identified items including indications of less than minimum wall thickness in certain areas of a Reactor Coolant Piping Loop weld; a leaking shop weld in the Component Cooling Water System; repair activities related to gouge and grinding marks in one area of Reactor Coolant Piping Loop No. 1-3; and resolution of Unit 1 Reactor Vessel preservice inspection indications.

The inspection involved 67 inspection-hours by two NRC inspectors.

Results: Of the areas examined, one item of noncompliance was identified in the failure of the licensee to promptly notify the NRC of a potentially reportable condition in accordance with the technical specifications (paragraph 5).

## DETAILS

### 1. Individuals Contacted

#### a. Pacific Gas and Electric Company (PG&E)

\*W. A. Raymond, Assistant Manager for Nuclear Plant Operations  
+\*R. C. Thornberry, Plant Manager  
+\*R. Patterson, Plant Superintendent  
\*R. D. Ezzler, Project Superintendent, General Construction  
+\*W. B. Kaefer, Technical Assistant to Plant Manager  
+\*J. A. Sexton, Supervisor of Operations  
\*D. B. Miklush, Supervisor of Maintenance  
\*J. V. Boots, Supervisor of Chemistry and Radiation Protection  
\*R. G. Tadaro, Security Supervisor  
+\*R. T. Twiddy, Supervisor of Quality Assurance  
\*D. R. Bell, Quality Control Engineer, General Construction  
\*J. M. Gisclon, Power Plant Engineer  
\*E. M. Conway, Personnel and General Services Supervisor  
\*M. N. Norem, Lead Startup Engineer  
\*R. M. Luckett, Regulatory Compliance Engineer  
T. D. Smith, Senior Quality Control Engineer  
D. A. Gonzales, Quality Control Inspector

#### b. Bechtel Corporation (Bechtel)

+\*J. W. Shryock, Site Completion Manager  
D. O. Henery, NDE Level III Engineer

#### c. Pullman Power Products Corporation (Pullman)

H. W. Karner, Quality Assurance/Quality Control Manager

+Denotes personnel attending the exit management meeting of May 27, 1983.

\*Denotes personnel attending the exit management meeting of June 3, 1983.

### 2. Licensee Action on Previous Inspection Findings

#### (Open) Followup Item (50-275/83-17/05): Degradation of the Reactor Coolant System Pressure Boundary

On May 3, 1983, the licensee submitted LER No. 83-004 concerning the discovery of gouges and marks in the reactor coolant system piping. The marks and gouge were discovered on the discharge side of the No. 3 Reactor Coolant Pump. Of the four blemishes discovered the most severe is a gouge approximately 0.150 inches deep by 2.0 inches long and 0.150 inches wide. The licensee has completed an ASME Section XI repair plan which has been submitted to their engineering department for review and

approval. The licensee has determined that the gouges can be removed by grinding and blending without violation of minimum pipe wall thickness criteria. The licensee's repair and inspection activities on this item will be examined during future inspections.

No items of noncompliance or deviations were identified.

3. Unit 1 Preservice Inspection (Baseline)

The Westinghouse Preservice Inspection summary for Unit 1 is currently under review by the licensee. Discussions with licensee personnel determined that the four indications requiring evaluation have been resolved. The four indications are located on the base material approximately four and one-half inches below the centerline of the flange-to-upper shell weld at vessel azimuths of approximately 25°, 115°, 205° and 295°. Evaluation of the indications suggest that they are the result of handling lugs which may have been attached during vessel manufacture.

No items of noncompliance or deviations were identified.

4. Component Cooling Water Weld Discrepancy

On May 23, 1983 the licensee submitted LER No. 83-007 concerning a discrepancy in a shop weld in the Component Cooling Water System. Licensee personnel observed that in the process of welding a reinforcement pad on a branch connection to the non-vital loop C of the Component Cooling Water System, water began leaking from the weld area. The discrepancy was determined to be a flaw in the root pass of the shop weld joining the branch connection to the header. The licensee indicated that repairs will be made using an approved ASME Section XI repair program. In the interim the branch connection has been cut out and sent to a materials laboratory to determine the failure mechanism.

As indicated in LER No. 83-007, the initial ultrasonic examination of the discrepant weld and ten other similar welds indicated that the code required full penetration welds may not have been made. However, when the branch connection with the discrepant weld was cut out, a full penetration weld was found. The presence of the full penetration weld raises questions regarding the applicability of this type of NDE method for this weld configuration. Examination of the weld detail for the discrepant weld determined that the weld detail did not clearly specify what type of weld was required. Based on these findings the inspector considers that a document review of other similar type branch connection weld packages would assure that the welds complied with code requirements. In addition, the inconclusive results of the ultrasonic examination on the ten similar type welds indicates that this type of nondestructive examination would not provide credible results.

The above expressed concerns and the licensee's repair program and inspection activities will be examined during a future inspection.  
(50-275/83-20/01)



## 5. Violation of Minimum Wall Thickness on Reactor Coolant System Piping

On May 23, 1983, the licensee submitted LER No. 83-006 describing four areas of Weld No. WIB-RC-2-17 that were found to be less than the minimum wall thickness specified by design. Weld No. WIB-RC-2-17 is in Loop No. 2 of the cold leg between the reactor coolant pump and the reactor vessel. During this inspection the inspector was informed that subsequent examination by the licensee of twenty additional welds (located inside the biological shield) identified two more welds with potential minimum wall violations (Weld Nos. 2-19 and 4-17). The licensee is performing additional confirmatory NDE examinations to verify the validity of the initial findings. If a minimum wall problem is confirmed the licensee will document the discrepant welds on the same nonconformance report documenting Weld No. WIB-RC-2-17. This weld is documented on Nonconformance Report No. DCI-83-QC-N024.

During examination of licensee activities related to this item the inspectors became aware of an apparent failure by the licensee to follow their nonconforming report procedure for the identification of discrepant conditions. This failure resulted in a delay in notifying the NRC of a potentially reportable condition in accordance with the provisions of the Technical Specifications. The chronology of events, from the initial discovery of the discrepant condition to the May 10, 1983 NRC notification is described as follows:

- . December 1982 - the licensee formulated plans to examine Reactor Coolant System Piping welds.
- . December 7, 1982 - Weld No. WIB-RC-2-17 is measured with a NORTEC 131-D, ultrasonic tester.
- . December 13, 1982 - a wall thickness measurement report is submitted. This report describes potential minimum wall problems with Weld Nos. WIB-RC-2-17 and WIB-RC-3-13. This report is distributed to appropriate levels of plant management including the plant manager, plant superintendent, and project superintendent.
- . December 17, 1982 - a Nuclear Plant Problem Report (NPPR) is written on Welds Nos. WIB-RC-2-17 and WIB-RC-3-13.
- . January 7, 1983 - Weld Nos. WIB-RC-2-17 and WIB-RC-3-13 are re-examined. Weld No. 2-17 is confirmed below minimum wall and Weld No. 3-13 is found to be within design limits.
- . February 16, 1983 - Westinghouse attempts mechanical measurements from inside pipe, the results are not conclusive but some low areas are detected.
- . March 28, 1983 - Weld No. WIB-RC-2-17 is examined again using a new ultrasonic tester (KB/USL-38). The weld is again confirmed below minimum wall.



- April 1, 1983 - ISI/NDE weekly reports indicate that Weld No. WIB-RC-2-17 examined and confirmed below minimum wall.
- April 13, 1983 - Westinghouse Field Deficiency Report is issued with a proposed disposition.
- May 5, 1983 - a Nonconformance Report is written on Weld No. WIP-RC-2-17.
- May 6, 1983 - Licensee requests that examinations on Weld No. WIB-RC-2-17 be repeated to confirm and determine to what extent the condition exists.
- May 9, 1983 - Weld No. WIB-RC-2-17 is examined again using a KB/USL-38 ultrasonic tester and confirmed as being below minimum wall.
- May 10, 1983 - NRC informed of minimum wall conditions for Weld No. WIB-RC-2-17.

The inspectors noted that 10 CFR 50.36(c) specifies that Technical Specifications include items in the categories delineated therein. Category No. 4, which is entitled "Design Features" states that, "Design features to be included are those features of the facility such as material of construction and geometric arrangements which if altered or modified would have a significant effect on safety..." Section 5.4.1 of the Technical Specifications for the Diablo Canyon Nuclear Power Plant Unit No. 1 states that, "The reactor coolant system is designed and shall be maintained...in accordance with the code requirements specified in Section 5.2 of the FSAR..." Section 5.2.3 of the Diablo Canyon FSAR states in part that, "The minimum wall thickness of the pipe and fittings are not less than that calculated using ASA B31.1, Section 1 formula of paragraph 122..."

The inspectors reviewed Westinghouse Equipment Specification No. G-676341, dated April 4, 1967, which describes the design and construction of the reactor coolant system piping. Paragraph 3.2 of this specification requires that the minimum wall thickness shall not be less than that calculated using ASA B31.1, Section 1 paragraph 122. Calculations by the inspectors verified the minimum wall design requirements for the cold leg of the reactor coolant piping is 2.22 inches. Southwest Fabricating Drawing No. 7524-F, Sheet 9 specifies the minimum wall for the RCS cold leg piping as 2.215 inches.

The inspectors further noted that Nuclear Plant Administrative Procedure No. C-12, "Identification and Resolution of Problems and Nonconformances," states in part in paragraph C.1.a that, "The Plant Manager and the plant department heads have been delegated the responsibility for determining whether a problem identified in a Nuclear

Plant Problem Report is a nonconformance." A nonconformance is defined in paragraph C.1.b. of this procedure as a, "Discrepancy or departure from requirements in purchase specifications, drawings, approved practices, established Quality Assurance policies or procedures, or NRC regulations which require resolution...and...if left uncorrected could have resulted in degradation or loss of integrity of the reactor coolant pressure boundary." Appendix A of the procedure provides examples to aid in determining whether a problem or potential problem is a nonconformance. Paragraph E.1. of Appendix A to the procedure states that, "A discrepancy or departure from requirements in design documents or activities shall be identified and documented as a nonconformance if...~~It was identified after the design document had been approved and it~~ was issued for use as a basis for further design." The departure of Weld No. WIB-RC-2-17 from specified design requirements appears to fall into the category of a nonconformance.

Therefore, as the previously presented chronology of licensee actions indicate that by December 13, 1983 appropriate levels of plant management were informed of the discrepancy. In addition, on December 17, 1982 a Nuclear Plant Problem Report No. DCI-82-QC-P0300 was written describing the discrepant condition, though it was not reported at this time as a condition requiring a nonconformance report. It appears that sufficient evidence was available at this time to warrant issuance of a nonconformance report. If a nonconformance had been written the Technical Review Group would have been required to review the discrepant condition for reportability under the Technical Specifications. Further, paragraph 6.9.1.12.i of the Technical Specifications requires that, "Discovery during unit life of conditions not specifically considered in the safety analysis report or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition," be reported within 24 hours to the NRC. Discussions with the Office of Nuclear Reactor Regulation (NRR), Standard Technical Specification Group indicate that corrective measures includes engineering analysis. It appears that the late documentation of the condition in the nonconformance reporting system contributed to the untimely reporting of this problem to the NRC.

The failure of the licensee to comply with technical specifications and report the defective weld in a timely manner is considered an apparent item of noncompliance. (50-275/83-20/02)

#### 6. Management Meeting

On May 27 and June 3, 1983, the inspectors met with licensee representatives denoted in paragraph 1. The scope of the inspection, the observations, and the findings of the inspectors were discussed. The licensee acknowledged the inspectors concerns and the apparent item of noncompliance as described in this report.

In the Matter of )  
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 )  
 PACIFIC GAS AND ELECTRIC COMPANY ) Docket Nos. 50-275 O.L.  
 ) 50-323 O.L.  
 (Diablo Canyon Nuclear Power )  
 Plant, Units 1 and 2) )  
 )  
 )

I hereby certify that on this 6th day of July, 1983, I have served copies of the foregoing SUPPLEMENT TO JOINT INTERVENORS' MOTION TO REOPEN THE RECORD ON THE ISSUE OF CONSTRUCTION QUALITY ASSURANCE, mailing them through the U.S. mails, first class, postage prepaid.

Malcolm H. Furbush, Esq.  
Vice President & General  
Counsel  
Philip A. Crane, Esq.  
Pacific Gas & Electric Company  
Post Office Box 7442  
San Francisco, CA 94106

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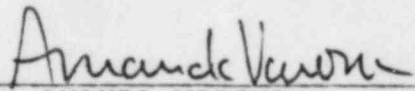
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AMANDA VARONA

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\* By Express Mail