

PACIFIC GAS AND ELECTRIC COMPANY

PG&E

77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94.

(415) 781-4211 • TWX 910-372-6587

J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

August 18, 1983

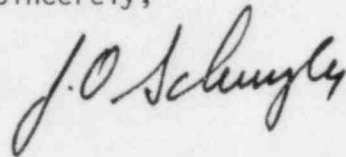
Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
IE Inspection Report 83-10/83-13 -- Notice of Violation
Request For Further Information

Dear Mr. Martin:

NRC Letter dated July 29, 1983 requested further information on PGandE response to a Notice of Violation transmitted by our letter dated June 20, 1983. Enclosed is PGandE's response to this request.

Sincerely,



Enclosure

cc: Service List

1983 AUG 19 PM 1:10
RECEIVED
RMC

8309080070 830901
PDR ADOCK 05000275
Q PDR

83-192

PGandE Response To Request For Further Information
In NRC Letter Dated July 29, 1983.
(NRC Inspection Report 83-10/83-13)

On May 19, 1983, NRC Region V issued a Notice of Violation as a result of NRC inspections conducted from March 30, 1983 through April 29, 1983. PGandE submitted the response to that Notice of Violation on June 20, 1983.

NRC Letter dated July 29, 1983 requested further information in the following two areas:

1. "In addition to the Notice of Violation, our letter of May 19, 1983 requested that you address the following two issues:

'(1) provide an assessment of the degree to which your welder requalification procedures and implementation practices, employed both in the past and at present, comply with the requirements of the ASME B&PV Code; and (2) the effect on welding quality of any identified failure to comply with code requirements.'

It is not evident from your response that you specifically addressed these two issues.

2. Your response to item A.1 of the Notice of Violation did not recognize the failure of your contractor to follow approved procedures and did not address measures to assure procedural compliance in the future."

Response To Item 1 of NRC Letter Dated July 29, 1983

PGandE's response to the inspection report indicated that a discrepant method used by H. P. Foley Company to conduct a welder recertification was an isolated case and, therefore, did not specifically address the additional information request. However, in response to the NRC letter of July 29, 1983, the following explanations are provided:

Assessment of Degree of Compliance

Pullman Power Products Corporation and the H. P. Foley Company currently employ welders qualified in accordance with ASME Boiler and Pressure Vessel Code requirements. Pullman performs ASME N-stamp welding on plant pressure vessels and piping; Foley performs ASME welding on instrumentation tubing and ventilation piping. An assessment of the compliance of the H. P. Foley Company and Pullman Power Products Corporation welder requalification procedures and implementation practices (employed both in the past and at present) to the requirements of ASME B&PV Code has been conducted.

The assessment indicates that, except for the discrepancy identified in the Notice of Violation, both the past and present applicable procedures used by the two companies are in complete compliance with ASME Code welder qualification and welder recertification

Assessment of Degree of Compliance (Continued)

requirements. Both contractors' procedures for ASME welder qualification are reviewed and approved by PGandE prior to implementation, to assure that all requirements of ASME B&PV Code are adequately addressed. Compliance with procedures is verified through audits conducted by the contractor and PGandE.

Effect of Welding Quality

The recertification method identified in the NRC special inspection was verified as being an isolated incident resulting from insufficient training of the H. P. Foley Company Quality Control Inspector responsible for supervising the retest, and was limited to recertification of a foreman not engaged in production welding. Therefore, H. P. Foley's failure to comply with the procedural requirements had no effect on weld quality.

In summary, it has been established, except for the isolated case identified in the inspection report, that contractors' procedures are in complete compliance with the ASME B&PV Code welder qualifications and recertification requirements. Furthermore, the failure of H. P. Foley to comply with procedural requirements had no effect on welding quality since the individual who was incorrectly recertified was not subsequently engaged in production welding.

Response to Item 2 of NRC Letter dated July 29, 1983

The following supplements our June 20, 1983 response to Item A.1 - Premature Removal of "Red Hold Tags":

PGandE recognizes that when the H. P. Foley Company Quality Control inspector prematurely removed "Red Hold Tags" attached to structural steel beams at elevation 187 of the Fuel Handling Building Hot Shop, he did not follow approved procedures. Removal of the "Red Hold Tags" was not allowed by QCP-3 Rev. 5 until the work was completed, inspected by Quality Control and the Nonconformance Report was signed off by the H. P. Foley Project Manager as being complete. The noted violation was an isolated case involving one individual. The individual who prematurely removed the "Red Hold Tags" has been counselled as to where he violated procedural requirements and instructed on the need to follow approved procedures.

In order to address future generic procedural compliance, H. P. Foley has conducted training classes on inspection criteria and procedures for Quality Control inspectors; this includes Revision 6 of QCP-3. Additionally, H. P. Foley has increased the

number of Quality Control inspectors, thereby improving the ratio of inspectors to workers from 1 in 25 in January to 1 in 10 currently. The H. P. Foley hiring policy has also been adjusted to provide a greater level of experience for the Quality Control inspectors than previously obtained. This policy has increased the average level of experience for each individual from 21 months in January to 86 months in April. The current average level of experience is 50 months. Furthermore, the time available for inspection has been increased by providing the inspector more support in the administrative work activities. Finally, H. P. Foley Quality Control/Quality Assurance organization has been further strengthened to provide the necessary leadership to assure conformance with approved procedures.

H. P. Foley Procedure QCP-3 was revised on May 20, 1983 (Rev. 6) to allow removal of "Red Hold Tags" after inspection and acceptance of repairs by the Quality Control inspectors and prior to final closure of a Nonconformance Report. Compliance with the revised procedure (QCP-3 Rev. 6) shall be audited by the H. P. Foley Quality Assurance Department and surveillance performed by the PGandE Quality Control Department.