PACIFIC GAS AND ELECTRIC COMPANY

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

July 15, 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
Diablo Canyon Unit 1
IE Inspection Report 50-275/83-20 -- Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 50-275/83-20, dated June 17, 1983, included a Severity Level IV Notice of Violation for Unit 1. PGandE's response to this Notice is enclosed.

Sincerely,

J O Schuyler

Enclosure

cc w/enc: Service List

83-167

PGandE'S RESPONSE TO NOTICE OF VIOLATION
IN NRC'S INSPECTION REPORT 50-275/83-20

On June 17, 1983 NRC Region V issued a Severity Level IV Notice of Violation ("Notice"), as part of NRC Inspection Report 50-275//83-20 on Diablo Canyon Unit 1. The Notice cited a concern related to the timeliness of the reporting of an apparent finding that certain areas on a girth weld, WIB-RC-2-17, on the cold leg of reactor coolant loop 2 did not meet the specified minimum wall thickness requirements. This apparent condition was first identified in December, 1982 and was reported to the NRC on May 10, 1983. The violation was described in the Notice as:

> "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 designate, 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.i 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 on 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."

Discussion

The concern regarding minimum wall thickness was originally raised as a result of ultrasonic (UT) measurements made in December, 1982 to supplement preservice inspection data. The original UT measurements were made with the intention of generating contour plots of the weld root counterbore surface to identify possible geometric reflectors that might produce anomalous indications in future inservice inspections. For this purpose, the axial variation in thickness is more important than the absolute value of thickness.

After extensive investigations were conducted on this subject and documented in a report transmitted to the NRC on July 5, 1983, we concluded that the UT measurements lack the precision required for absolute measurement of reactor coolant loop weld thickness after the piping was installed.

The essence of this violation, however, is not whether the UT measurements are, or are not, shown to be reliable for this application, but, rather, involves whether or not the occurrence was handled properly in accordance with established procedures for documenting and resolving potential nonconformances. This is succinctly stated on page 5 of NRC Inspection Report 50-275/83-20:

> "Therefore, as the previously presented chronology of licensee actions indicate that by December 13, 1982* 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."

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*This date is shown as "1983" in the Inspection Report.

We concur that the problem should have been documented in a Nonconformance Report in December, 1982. At the very least, this would have led to a more timely investigation of the type recently conducted, and a more thoughtful evaluation of reporting implications.

The general subject of the handling of potential nonconformances and their reporting has been given considerable recent attention as a result of the manner in which the reactor coolant loop gouging incident was reported in April, 1983. As a result of a one-day delay in reporting this occurrence, PGandE received a Severity Level V Notice of Violation dated May 26, 1983. PGandE's response to this Notice of Violation, dated June 27, 1983, described corrective steps taken to improve the areas of nonconformance reporting and investigation. The corrective action described in that response is applicable to this violation as well.

Corrective Steps Which Will be Taken to Avoid Further Items of Noncompliance

Based on the actions described above and already implemented, PGandE believes that adequate corrective action has been taken. Therefore, no additional corrective steps are necessary.

Date of Full Compliance

Full compliance has already been achieved.