

PACIFIC GAS AND ELECTRIC COMPANY

PG&E

77 BEALE STREET, S.F. FRANCISCO, CALIFORNIA 94106
P.O. BOX 7442, SAN FRANCISCO, CALIFORNIA 94120

TELEPHONE (415) 781-4211
TELECOPIER (415) 543-7813

ROBERT OHLBACH
VICE PRESIDENT AND GENERAL ATTORNEY

CHARLES T. VAN DEUSEN
PHILIP A. CRANE, JR.
HENRY J. LAPLANTE
JOHN B. GIBSON
ARTHUR L. HILLMAN, JR.
CHARLES W. THISSELL
DANIEL E. GIBSON
JACK P. FALLIN, JR.
JOSEPH I. KELLY
ASSISTANT GENERAL COUNSEL

GILBERT L. HARRICK
DANIEL W. WERT, JR.
HOWARD V. DEUB
JAMES G. LORSON
ROBERT L. BOGREN
ROYAL W. RANDELMAN
RICHARD F. LOCKE
DAVID L. TUCKERMAN
WILLIAM H. EDWARDS
F. RONALD LAUGHNER
ROBERT W. ROBERT
DAVID J. WILLIAMSON
BRUCE R. WORTHINGTON

SEN JIM CONNEL

EDWARD J. MCGANNEY
DAN BRADEN LUSOCK
BARNARD J. DELLABANTA
JENNIFER BARLEY
JOSEPH B. EDDERT, JR.
ROBERT L. HARRIS
DOUGLAS A. GILBERT
J. PETER BAUMGARTNER
JOHN P. FINE
J. MICHAEL PEYENBACH
THOMAS S. BARNES
BRUCE A. WOO

DAVID W. ANDERSON
DAVID M. BUCKENBURN
LEON B. GARRID
ANDREW DANCE
DONALD D. SANDERSON
DAVID G. GILBERT
STEVEN F. GREENWALD
JIMMY M. ARD
MERRA E. LIPSON
JESSICA LORSON
A. K. M. MCKENZIE
RICHARD L. MILES
KENNETH D. OLSEN
BRUCE A. SANDERSON
JACK W. SHUCK
KENNETH YANG

ATTORNEYS

STANLEY T. ANAND
STEVEN P. BURKE
KAMEA CHAPPELLE
DARYL F. ENCHAK
DAVID H. FLEND
PATRICIA D. GOLDEN
WILLIAM HAYES
RICHARD C. JONES
HARRY W. LONG, JR.
JOHN R. LOW
ROBERT B. McLENNAN
RICHARD M. MOSS
ROGER J. PETERS
JOHN SHAPIRO
LOUIS E. VINDENT

March 31, 1982

Mr. B. H. Faulkenberry
U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Re: Docket No. 50-275
Diablo Canyon Unit 1
License No. DPR-76

Dear Mr. Faulkenberry:

NRC Inspection Report 50-275/82-01 included a Notice of Violation on a Severity Level V Violation, which required a written response by March 31, 1982 from PGandE. PGandE's response to the requirements of this Notice is enclosed.

Very truly yours,

Philip A. Crane, Jr.

Enclosure

cc (w/enc.): W. A. Raymond
R. C. Thornberry

Service List

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PGandE RESPONSE TO NOTICE OF VIOLATION
IN NRC INSPECTION REPORT 50-275/82-01

On March 1, 1982, NRC Region V issued a Severity Level V Notice of Violation, included in NRC Inspection Report 50-275/82-01, on Diablo Canyon Unit 1. This Notice resulted from inspections conducted during January 4-8 and January 13, 1982. The incident involved field verification of the installation of electrical raceway supports. The violation concerned the fact that no audits were performed or formally scheduled by PGandE's Engineering Quality Control Department of the field verification program.

PGandE's Quality Assurance Program is directed and controlled by PGandE's Quality Assurance Manual. Within PGandE, the Engineering Department's activities for compliance with the Quality Assurance Manual, as well as 10 CFR 50 Appendix B, are directed and controlled by PGandE's Engineering Manual. This manual identifies interfaces between various groups within PGandE involved with engineering tasks. The purpose of the Engineering Manual is to control and coordinate the design functions performed by these groups as part of the Engineering Department's normal design responsibilities.

Beginning in October 1981, PGandE initiated a design verification program for Diablo Canyon. In instituting the verification program, certain tasks were identified which were not covered in sufficient detail by the Engineering Manual at that time. PGandE's Engineering Department recognized the necessity of controlling these tasks and, accordingly, established procedures to the Engineering Manual for implementing such tasks. The establishment of implementing procedures, however, has been separately accomplished by distinct disciplinary groups within PGandE. There were no requirements at that time for the control of distribution and coordination of such implementing procedures. In this particular case, one group of individuals committed another group to perform a task, but the implementing procedure and this interface were not coordinated with other groups which included, specifically, the Engineering Quality Control Department (EQC). This resulted in the item of non-compliance cited in this Notice.

Corrective steps have been taken to resolve this item of non-compliance. Specifically, EQC was notified on January 6, 1982 of the commitment to audit the "Electrical Raceway Support Field Verification Instruction." An activity audit of this procedure was conducted at the site on January 11 and 12, 1982. The results of that audit were reported, verbally, to Mr. John Burdoin, of the NRC, at a meeting at PGandE on January 16, 1982. During this meeting Mr. Burdoin stated that an allegation had been filed that discrepancies, specifically involving

four raceway supports (hangers) noted during the field verification were not being reported. EQC then extended the scope of its audit to include this alleged discrepancy and re-audited on January 20 and 21, 1982. In the sample taken during this expanded audit, including the four hangers questioned by Mr. Burdoin, no evidence was found of discrepant hangers not being reported. Further, those hangers that were found discrepant had been addressed and resolved in accordance with either PGandE's quality assurance procedures or the quality assurance procedures of PGandE's construction contractor, H. P. Foley Company.

To assure that there were no similar occurrences in other areas, EQC on January 18, 1982 issued requirements to the various PGandE design groups for control of implementing procedures and requested copies of all implementing procedures that had been previously written. EQC reviewed all these procedures to assure that appropriate interface requirements exist and have been implemented. Furthermore, EQC promulgated a new procedure in the Engineering Manual defining requirements for control and interface for any work instruction or implementing procedures which may be prepared by the Engineering Department. The procedure has been signed (March 15, 1982) by Mr. D. A. Brand, Vice President Engineering. This procedure, as incorporated in the existing quality control program, should avoid further similar items of non-compliance. Therefore, as of March 15, 1982, full compliance has been achieved in resolution of this Notice of Violation.