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July 23, 1991

PG&E Letter No. DCL-91-186



U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Reply to Safeguards Notice of Violation in NRC Inspection Report
Nos. 50-275/91-12 and 50-323/91-12

Gentlemen:

NRC Inspection Report Nos. 50-275/91-12 and 50-323/91-12, dated June 25, 1991, contained a Notice of Violation citing three Severity Level IV violations and two non-cited violations regarding security.

PG&E's response to the Notice of Violation is enclosed.

The Inspection Report cover letter indicates that one of the violations was similar to a previously identified violation and the remaining two violations were similar to previous non-cited violations. The letter also indicates that these licensee-identified violations are of concern because they demonstrate that, in spite of PG&E efforts to reduce these types of events, corrective actions have been less than fully effective. The cover letter concludes that the relative ease with which unauthorized individuals have repeatedly gained vital area access continues to demonstrate the possibility of a more serious compromise.

PG&E letter DCL-90-128, dated May 17, 1990, responded to the previous violation contained in NRC Enforcement Action 90-41. In this letter, PG&E noted that the issue of unauthorized personnel accessing vital areas had been identified by PG&E prior to the January 1990 NRC inspection, and that PG&E had initiated comprehensive corrective actions to minimize similar events in the future. PG&E indicated that if the number of incidents did not decrease, the method of access control to vital areas would be reevaluated.

PG&E has completed implementation of its comprehensive corrective action plan in response to the 1990 NOV. PG&E and the NRC agree that substantial improvement has been made in reducing the number of unauthorized personnel not properly logged into vital areas. In addition, PG&E has surveyed Region V utilities and selected utilities in other NRC regions and believes DCPD is not out of line compared to other utilities, especially when the number of vital areas and vital area card reader-equipped doors are considered.

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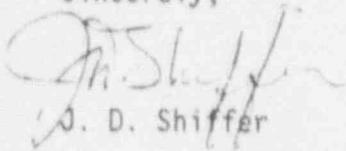
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Based on our root cause analysis of the events which resulted in the proposed violation, PG&E believes that further corrective actions are appropriate. For this reason, PG&E does not contest the proposed violation and intends to pursue the corrective actions previously identified in DCL-90-128, as well as the additional corrective actions identified in the enclosure. If PG&E's improved performance since 1990 is not maintained, PG&E will reevaluate its corrective actions, and other appropriate options will be considered.

The enclosure to this letter contains safeguards information and must be protected from unauthorized disclosure in accordance with 10 CFR 73.21.

Sincerely,



J. D. Shiffer

cc: John B. Martin
Phillip J. Morrill
Paul P. Narbut
Ronald G. Todaro
Diablo Distribution (w/o enc.)

Enclosure

5415S/0011K/KAH/2237

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