

PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

March 1, 1984

PGandE Letter No.: DCL-84-088

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

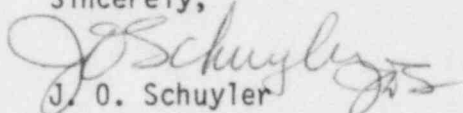
Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
IE Inspection Report 83-40 -- Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 50-275/83-40 dated January 31, 1984 included a notice for two Severity Level IV violations. PGandE's response to this notice is enclosed.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,


J. O. Schuyler

Enclosure

cc: Service List

8404030213 840328
PDR ADDCK 05000275
G PDR

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-275/83-40

On January 31, 1984, NRC Region V issued two Severity Level IV Notices of Violation ("Notices") as part of NRC Inspection Report 50-275/83-40 for Diablo Canyon Unit 1. The Notices cited:

- A concern that an EQ file did not include appropriate verifying signatures; and
- A concern that EQ file formats were inadequately controlled.

A. FILE NOT CONTAINING APPROPRIATE VERIFICATION SIGNATURES

STATEMENT OF VIOLATION

["10 CFR 50, Appendix B, Criterion III "Design Control", states in part that "Measures shall be established to assure that applicable regulatory requirements and the design basis...are correctly translated into specifications, drawings, procedures, and instructions. ...the design control measures shall provide for verifying or checking the adequacy of design.... The verifying or checking process shall be performed by individuals or groups other than those who performed the original design, but who may be from the same organization."

Contrary to the above, on December 19, 1983, the Equipment Qualification file IH-14, "Barton Pressure & Differential Pressure Transmitters" was observed to contain a component evaluation report which had been signed and dated by preparing and checking engineers in August 1981, but was subsequently revised, signed by one engineer, and dated January 7, 1983."]

EXPLANATION AND CORRECTIVE ACTION TAKEN

The Equipment Qualification (EQ) file for "Barton Pressure and Differential Pressure Transmitters, "cited as No. IH14 in the Notice (the correct EQ file number is IH24), was in the process of being revised as a result of the Independent Design Verification Program (IDVP). Revision of file IH24 was not complete because verification of the manufacturer's EQ for the transmitters was only recently completed and PGandE was still evaluating the reports.

Subsequent to the NRC audit of December 13-20, 1983, and in response to concerns raised at the exit interview, an Interoffice Memorandum (IOM) dated December 27, 1983 was issued to all engineering disciplines covering procedures to revise existing files and prepare new files. This IOM was incorporated into Project Engineer's Instruction 18 (PEI-18).

Using these instructions, revision to the EQ files was completed on December 30, 1983. These files will now be treated as quality records. PGandE has assured that this file conforms to the requirements of 10 CFR 50, Appendix B, Criterion III.

CORRECTIVE ACTION WHICH WILL BE TAKEN

No further corrective action is necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

B. INADEQUATELY CONTROLLED COMPONENT EVALUATION REPORT FORMAT

STATEMENT OF VIOLATION

["10 CFR 50, Appendix B, Criterion VI "Document Control", states in part that "Measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which prescribe all activities affecting quality."

Contrary to the above, on December 16, 1983, Environmental Qualification files prepared or being revised by the Diablo Canyon Project Electrical (EH-3 "Raychem/Flamtrol cable"), Control Instrumentation (IH-16 "SMB Series Limitorque valve operators"), and Heating, Ventilation, and Air Conditioning (HH-2 "ASCO Solenoid valves") disciplines were observed to contain uncontrolled component evaluation report formats, a result of the failure to prescribe the controls applicable to environmental qualification file preparation, review, approval, and retention."]

EXPLANATION AND CORRECTIVE ACTION TAKEN

EQ files were audited by the NRC in the Fall of 1981 and accepted as satisfactory records. It should also be noted that, subsequent to the IDVP findings during 1982 and 1983, PGandE agreed to update certain EQ files. The EQ files (EH-3, IH-16 and HH-2) audited by the Region V inspectors during the December 13-20 period were among those being updated, and were not in final form.

Subsequent to this audit and in response to concerns expressed at the exit interview, an Interoffice Memorandum (IOM) dated December 27, 1983 was issued to all engineering disciplines covering procedures to revise existing files and prepare new files using the specified format. Using these instructions, revisions to the EQ files were completed on December 30, 1983. This IOM was incorporated into Project Engineer's Instruction 18 (PEI-18). These files will now be treated as quality records.

PGandE feels, however, that equipment was qualified to the required environmental conditions, and appropriate files and records (such as test reports, analyses and procurement documents) were kept and maintained as quality records. In order to develop the EQ files and to comply with the requirements of NUREG-0588, PGandE duplicated procurement records such as purchase orders, certificates of compliance, certified test reports as

appropriate for the equipment being qualified. It was these EQ files that were audited by the NRC and are the subject of the current Notice of Violation. PGandE maintains that the NUREG-0588 documents (EQ files) did not have to be maintained as quality records because the quality records for the subject equipment were already maintained as described above (i.e. there is no need or requirement to maintain duplicate quality records). PGandE feels that adequate measures of control were already in place in that both the procurement documents (Quality documents) and the EQ files which contained duplicate procurement records, already existed. Furthermore, the EQ files had already been audited by the NRC in the Fall of 1981. However, as discussed above, PGandE has taken the steps to assure that all EQ files are treated as quality records and conform to the requirements of 10 CFR 50, Appendix B, Criterion VI and all other applicable EQ requirements.

Because controls were in place to assure equipment qualification, PGandE believes that this situation has no safety or environmental significance as specified by 10 CFR Part 2, Appendix C, Supplement 1 "General Policy and Procedures for NRC Enforcement Actions," for a Level IV violation.

CORRECTIVE ACTION WHICH WILL BE TAKEN

No further corrective action is deemed necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.