

PACIFIC GAS AND ELECTRIC COMPANY

PG&E



77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

May 30, 1984

PGandE Letter No.: DCL-84-197

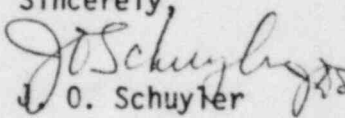
Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
Response to IEIR 84-03 - Notice of Violation

Dear Mr. Martin:

NRC Inspection Reports 50-275/84-03 and 50-323/84-03, dated April 30, 1984, contained a Severity Level IV Notice of Violation. 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

FILE COPY

8407060126 840629
PDR ADOCK 05000275
Q PDR

84-220

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORTS 50-275/84-03 AND 50-323/84-03

On April 30, 1984, Region V issued one Severity Level IV Notice of Violation ("Notice") as part of NRC Inspection Reports 50-275/84-03 and 50-323/84-03 for Diablo Canyon Units 1 and 2.

The Notice cited a concern of improper control of personnel access to Class I materials storage areas.

STATEMENT OF VIOLATION

"10 CFR 50, Appendix B, Criterion XIII requires that 'measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.'

PGandE Nuclear Plant Administrative Procedure (NPAP) D-501, 'Identification and Storage of Environmentally Qualified and Safety Related Material in Materials Facility' states in Section III.A.3, 'Access to the segregated area will be controlled by the Materials Department personnel...' In addition, the licensee's QC (sic)* program described in FSAR Chapter 17, commits them to ANSI N45.2.2-1972 'Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase).' ANSI N45.2.2-1972, Section 6.2.1 'Access to Storage Areas' specifies that 'Access to storage areas shall be controlled and limited only to personnel designated by the responsible organization.'

Contrary to the above, on March 6, 1984, the inspector observed unauthorized personnel enter Class I material storage areas (Pullman Shipping and Receiving Warehouse and 'Area 11' storage trailers at Patton Flats). Access to these segregated areas were not controlled and limited only to personnel designated by Pacific Gas and Electric.

This is a Severity Level IV Violation (Supplement II)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

PGandE recognized the advisability of improving practices for access controls to Class I materials storage areas and took appropriate actions as described below.

*should be: QA

1. Non-Conformance Report (NCR) DCO-84-SC-N006 was issued on February 3, 1984, based on an NRC unresolved item (50-275/84-02-01-01) and discussions on material storage areas between NRC Resident Inspectors and PGandE representatives. The nonconformance statement of this NCR is "Control of construction materials by the contractors does not comply with the access requirements of ANSI N45.2.2-1972, paragraph 6.2.1."
2. Diablo Canyon Technical Review Group (TRG) meetings were convened to determine cause, approve the proposed resolution, and establish the corrective action to prevent recurrence.

At these TRG meetings, the cause of the nonconformance was determined to be the absence of ANSI N45.2.2-1972 requirements in the specifications, such as Specification No. 8711 (Pullman Power) and No. 8802 (H. P. Foley). Interim corrective actions for storage areas were established. Oral instructions on securing Class I warehouse facilities (including Snubber Vault) and controlling access thereto, were given to the principal contractors and acknowledged by them. These instructions were subsequently confirmed as indicated in letters and memos attached to this enclosure.
3. Between April 2 and April 6, 1984, PGandE conducted an Activity Audit of control of Class I Snubbers at Diablo Canyon. This audit addressed all applicable ANSI N45.2.2-1972 requirements, including paragraph 6.2.1. No findings or open items reports were issued.
4. A review of Class I material storage warehouses at Diablo Canyon on May 22 and 23, confirmed that designated personnel are present to assure that materials are removed by written authorization only.
5. NCR DCO-84-SC-N006 has been dispositioned by a management-level TRG.

CORRECTIVE STEPS WHICH WILL BE TAKEN

A change to all applicable construction specifications will be made to bring them into compliance with ANSI N45.2.2-1972.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The attachments to this enclosure demonstrate that PGandE is now in full compliance with ANSI N45.2.2-1972, paragraph 6.2.1. In addition, the specifications will be revised to require compliance with ANSI N45.2.2-1972, paragraph 6.2.1 by June 30, 1984. Full compliance by the contractors is scheduled for October 1, 1984.

Attachments

PG&E**FOR INTRA - COMPANY USES**

From Division or
Department **QUALITY ASSURANCE**

FILE NO. **Diablo Canyon Power Plant**

RE LETTER OF
SUBJECT **210.4**

To Division or
Department **Warehouse Access Control**

QUALITY ASSURANCE

General Office

SMS	HBQ	DCQ	GW4
TCU	QUALITY ASSURANCE		HJH
RTT			DS1
RWP			US1
HMC			AG
PCU			CG
DI	MAY 24 1984		ESL
CON			MLB
NR1			NT1
CGD			PD1
RR	CISD	COMMENT	RPS
PAA		REPLY	JIV
QD	FILE		JNV
JLZ			KRK

May 24, 1984

MR. S. M. SKIDMORE

Attention: Mr. George Gregory

On May 23-24, 1984, the following was verified by reviewing the documentation and inspecting the storage facilities:

The Project Team notified Pullman Power Products and H. P. Foley on March 22 and 23, 1984, respectively, that access to warehouse areas be controlled by designated personnel (Memo DCC-13150 and 13151 attached). Pullman Power Products and H. P. Foley had issued a memo (attached) implementing warehouse access control on April 12 and February 20, 1984, respectively.

Pullman personnel at the main warehouse and Patton Flat (Area 10) facility were implementing their access control method and their memo of April 12, 1984, was posted.

H. P. Foley was implementing their access control system and their memo of February 20, 1984, was posted.

The following individuals were contacted:

Pullman Power Products

Harold Karner
Steve Tobias
Hugh Smith

H. P. Foley

Skip Moses
Ed Angelo
Leo Woodward
Les Fox

R. W. Taylor
R. W. Taylor

RWT(69-3203):dd

cc: C. M. Seward

PACIFIC GAS AND ELECTRIC COMPANY

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DIABLO CANYON PROJECT • GENERAL CONSTRUCTION
P.O. BOX 117 • AVILA BEACH, CALIFORNIA 93424 • (805) 595-2324

March 22, 1984

Pullman Power Products
P.O. Box 367
Avila Beach, California 93425

Attention: Paul Steiger
Resident Construction Manager

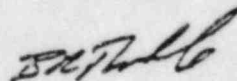
Diablo Canyon Project
Specification 8711
Confirming a Conversation

Dear Mr. Steiger,

This is to confirm the conversation between R. Tinkle (PTGC) and F. Lyautey (PPP) on March 16, 1984.

Please take the necessary steps to assure the Class I Warehouse Facilities (including the Snubber Vault) are maintained secure and that access to those areas are controlled by specifically designated personnel.

Sincerely,



R. Tinkle
Staff Field Engineer

Reply Requested: No
RT/KAN:lf

cc: KANilson
MFerree
JMacias
DBell
BKelly (NPO)
CSeward (QA)

DCC 13151

PACIFIC GAS AND ELECTRIC COMPANY-

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DIABLO CANYON PROJECT • GENERAL CONSTRUCTION
P.O. BOX 117 • AVILA BEACH, CALIFORNIA 93424 • (805) 595-2324

March 23, 1984

Howard P. Foley Company
P.O. Box 327
Avila Beach, California 93425

Attention: Skip Moses
Project Manager

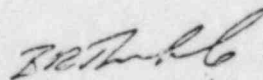
Diablo Canyon Project
Specification 8802
Confirming a Conversation

Dear Mr. Moses,

This is to confirm the conversation between R. Cook (PTGC) and Mr. Pippen (HPF) on March 16, 1984.

Please take the necessary steps to assure the Class I Warehouse Doors are secured and that the access to those areas are controlled by specifically designated personnel.

Sincerely,


R. Tinkle
Staff Field Engineer

Reply requested: no
RT/KAN: dmv
KANilson
MFerree
JMacias
DBell
BKelly (NPO)
CSeward (QA)

DCC

15150

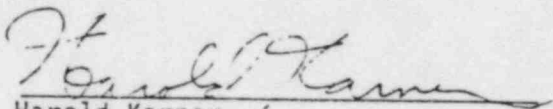
INTEROFFICE CORRESPONDENCE

DATE APRIL 12, 1984
TO ALL QA/QC, ENGINEERING AND CRAFT SUPERVISION
FROM H. KARNER/P. STIEGER
SUBJECT CLEARANCE TO THE NPS, SNUBBER, WAREHOUSE AND WELD ROD STORAGE AREAS

Authorized personnel assigned to the following departments have unescorted clearance to the NPS, Snubber, Warehouse and Weld Rod storage areas.

1. Quality Assurance and Quality Control.
2. Engineering and Purchasing.
3. Craft assigned to Warehouse and Area 10 Fab Shop.

All other personnel needing access to these areas must be accompanied by a representative from the departments listed above.


Harold Karner
QA/QC Manager


Paul Stieger
Resident Construction Manager

HWK:PS:sam

Attachment E

Department Managers and Project Engineers

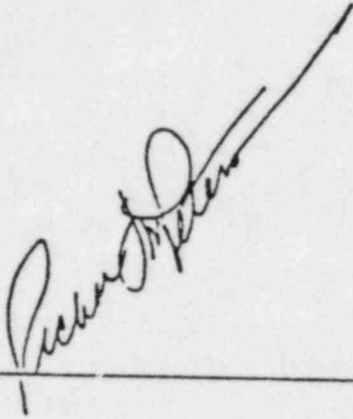
February 20, 1934

Richard M. Peters, Operational Manager

SUBJECT: The Howard P. Foley Company Warehouse Access

The only personnel authorized to enter the warehouse are The Howard P. Foley Company Managers, Engineers, Superintendents, General Foremen and Foremen.

Any other personnel from other contractors, P.G. and E. or P.T.G.C. personnel must be escorted by the warehouse Foreman, General Foreman or Superintendent.

A handwritten signature in cursive script, appearing to read "Richard M. Peters", is written over a horizontal line.