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PACIFIC GAS AND ELECTRIC COMPANY

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

REGION V

July 30, 1984

PGandE Letter No.: DCL-84-277

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

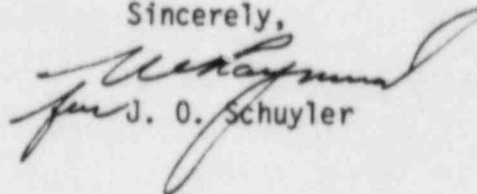
Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
Response to IEIR 50-275/84-10 -- Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 50-275/84-10, dated June 28, 1984, contained a Severity Level IV violation. PGandE's response to this Notice of Violation is enclosed.

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

Sincerely,


for J. O. Schuyler

Enclosure

cc: Service List

8408200318 840813
PDR ADOCK 05000275
PDR
Q

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-275/84-10

On June 28, 1984, NRC Region V issued a Severity Level IV Notice of Violation ("Notice") as part of NRC Inspection Report 50-275/84-10 for Diablo Canyon Unit 1. This Notice cited:

- A concern over an apparent lack of administrative control of jumpers and proper designation of a jumper's effect on safety functions.

The cover letter to the "Notice" recognized that PGandE's observations of other utilities and its on-shift management attention have been positive steps toward improved administrative control and requested that PGandE consider this in response to the "Notice." PGandE is continuing its efforts in this area as summarized in PGandE letters to the NRC dated April 4, 1984 (DCL-84-130) and June 15, 1984 (DCL-84-228).

STATEMENT OF VIOLATION

"Technical Specification 3.3.3.9 provides in part that 'The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE...At all times.' and 'With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12.'

Table 3.3-12 provides in part:

'RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION'

ACTION	INSTRUMENT	MINIMUM CHANNELS OPERABLE
GROSS BETA OR GAMMA MONITORS PROVIDING AUTOMATIC RADIOACTIVITY TERMINATION OF RELEASE		
a.	Liquid Radwaste Effluent (RM-18) Line	1 40
Action Statement 40 states:		
ACTION 40 -		
With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases may continue for up to 14 days provided that prior to initiating a release.		
a.	At least two independent samples are analyzed in accordance with Specification 4.11.1.1.1, and	

- b. At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge line valving;

Otherwise, suspend release of radioactive effluents via this pathway.

Contrary to the above requirements, during the period from March 26, 1984 through March 31, 1984, with the liquid radwaste effluent line (RM-18) capability to automatically terminate releases inoperable, four releases were made via this pathway without two independent samples analyzed or two independent release rate calculations.

This is a Severity Level IV Violation (Supplement 1)."

STATEMENT OF EXPLANATION

On March 22, 1984, a jumper had been installed around air operator SV-223 to hold closed valve FCV-477 for a hydrostatic test. The jumper was not removed upon test completion on March 26, 1984. Operations and maintenance personnel did not properly coordinate and implement the procedural control of jumper clearances with regard to bypassing protective features. The jumper also disabled the air operator to valve RCV-18 and would not have allowed this valve to close upon receipt of a high radiation signal from the Liquid Radwaste Effluent Line Radiation Monitor, RM-18. The channel was not declared inoperable at the time the jumper was installed and, as a result, Action Statement 40 of Technical Specification 3.3.3.9 was not entered. The jumper was removed upon discovery and valve RCV-18 was returned to service.

While RCV-18 was disabled, four discharges were made via this pathway from Equipment Drain Receiving Tank O-2, Chemical Drain Tank O-1, and Floor Drain Receiving Tanks O-1 and O-2. Though a sample of each tank was taken and analyzed prior to discharge, two independent samples were not performed as required by Action Statement 40 of Technical Specification 3.3.3.9.

RM-18 was still capable of measuring and alarming high radiation levels in the discharge line. Indication, recording, and alarm are located in the Control Room. Therefore any discharge of radioactive materials in excess of the RM-18 set point would have alerted the operator to take corrective action.

Diablo Canyon had not yet achieved initial criticality and had no radioactive materials in the liquid radwaste system at the time this event occurred. Even if the system had been contaminated, existing operating procedures would have precluded the release of radioactive materials above allowable limits to the environment. These procedures specify that a tank sample must be obtained and analyzed and the valve lineup verified prior to discharge.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

In order to improve administrative control and prevent the recurrence of similar events, PGandE has taken steps which are outlined in PGandE letters DCL-84-130 and DCL-84-228. The following additional actions have been taken to prevent recurrence of the above-mentioned violation:

1. Nuclear Plant Administrative Procedure (NPAP) C-4S1, "Mechanical Bypass, Jumper and Lifted Circuit Log (Form 69-9102)" has been revised to require that associated jumpers are included in the clearance package, and that information tags on jumpered equipment are placed in a prominent location on the equipment controls or indicators. This revision also provides specific instructions on the evaluation of the safety function bypass.
2. Training of all departments involved in jumper log preparation on the revised NPAP C-4S1 has been completed.
3. A review and backfit of existing jumpers to the new revision of NPAP C-4S1 has been completed.
4. Nuclear Plant Operations and General Construction personnel have been instructed in the necessity of not circumventing the work request or clearance control system.
5. The temporary lapse in the control of work package transmittals and requests between NPO maintenance departments is being rectified by increased attention to daily activities by supervisory and management personnel.

CORRECTIVE STEPS WHICH WILL BE TAKEN

Based on the actions described above PGandE believes that adequate corrective actions have been taken to prevent recurrence. Therefore, no additional corrective steps are necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on June 22, 1984.