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REGION V

JAMES D. SHIFFER

VICE PRESIDENT
NUCLEAR POWER GENERATION

October 5, 1984

PGandE Letter No.: DCL-84-322

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

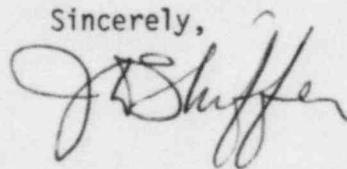
Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
Response to IEIR 50-275/84-23 -- Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 50-275/84-23, dated September 5, 1984, included one 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,



Enclosure

cc: Service List

8411010263 841029
PDR ADOCK 05000275
Q PDR

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATIONNRC INSPECTION REPORT NO. 50-275/84-23

On September 5, 1984, NRC Region V issued a Severity Level IV Notice Of Violation as part of NRC Inspection Report 50-275/84-23 for Diablo Canyon Unit 1. This Notice cited a concern over plant and corporate personnel not receiving required training in Emergency Planning.

STATEMENT OF VIOLATION

"10 CFR 50.54(q) requires a licensee to follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E of this part. Section IV.F of Appendix E, 10 CFR Part 50, requires initial training and periodic retraining of emergency personnel. Section 8.1.1 of the Diablo Canyon Emergency Plan requires initial and annual retraining. Table 1 of Procedure AP B-50, Emergency Planning Training, identifies the training requirements for site personnel who occupy emergency organization positions. Section II.C.3 of the Corporate Emergency Response Plan Implementing Procedure Number 2.2, Emergency Preparedness Training Program, identifies the initial and annual refresher training to be provided to corporate personnel who are assigned to the Corporate Emergency Response Organization.

Contrary to the above requirements, thirteen of the 200 onsite personnel who have assignments in the Site Emergency Organization had not received annual retraining in one or more of the courses required by their emergency organization assignments during 1983 and to date in 1984. In addition, eighteen of the 220 corporate personnel having assignments in the Corporate Emergency Response Organization had not taken the General Emergency Preparedness Program Overview Course, and fifty-six of these corporate personnel had not received the required initial/refresher training in the appropriate Corporate Emergency Plan Implementing Procedure.

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

EXPLANATION AND CORRECTIVE STEPS TAKEN

1. Onsite

Site Emergency Plan participants, who may come from a number of different departments, must be trained to properly respond to a spectrum of possible emergency situations. Several training programs are necessary to assure that they are appropriately prepared. Twelve training classes are provided to instruct individuals in their responsibilities.

As stated in the Notice, 13 of 200 individuals were noted as being deficient in their training requirements. Of the 13 individuals identified, one was on preretirement leave while another had completed retraining but his records had not been updated. Nine of the remaining 11 individuals have now been trained and are in compliance.

In response to the findings of the inspection report, the frequency of classes in the ongoing training program has been increased. Improvements to better identify training requirements to Emergency Plan participants and their supervisors have been implemented. The effort includes notification of individuals and their supervisors as to training requirements and class schedules.

Plant policy requiring each manager and supervisor to ensure that subordinates maintain their training has been emphasized. Deficiencies in emergency training are now reported to the appropriate managers and supervisors, and referred to higher levels of management if appropriate corrective action is not taken.

2. Corporate

The Corporate Emergency Response Plan (CERP) ensures that PGandE's considerable resources and capabilities, beyond those dedicated to nuclear power generation, can be utilized effectively to respond to an emergency at Diablo Canyon. The majority of the approximately 220 employees with emergency response positions perform their normal job functions when activated under the CERP. These employees are from various departments in PGandE such as Governmental Relations, Insurance, Personnel, Law, and Telecommunications; they do not have direct responsibility for the operation of Diablo Canyon under routine or emergency conditions.

Training for the CERP is normally scheduled annually during July, August, or September. Prior to training, a schedule is distributed to the Departmental Emergency Coordinators, who are responsible for ensuring that their respective personnel attend the required training.

Of the 18 employees identified at the time of the inspection as requiring initial overview training, eight were newly assigned to their emergency positions and one employee's training had not been recorded. Of the 56 employees identified as requiring departmental procedure training, 19 were newly assigned to their emergency positions, and nine were either no longer members of the CERP or their training had not been recorded. At the time of the inspection, the annual training had not been completed.

PGandE review had already identified that members of the corporate emergency response organization were deficient in required CERP training. Several actions had taken place to improve the CERP training program. Training program procedures were implemented to more clearly identify training requirements and individual training status. Departmental coordinators were notified of their responsibilities and the importance of compliance with the CERP training program. Additional training courses were scheduled.

The CERP training program improvements have been implemented and will allow close monitoring of employee training status. In addition, prompt follow-up and appropriate action will ensure CERP training requirements are met. Employees will not be assigned responsibilities under the CERP until initial training requirements have been met.

CORRECTIVE STEPS WHICH WILL BE TAKEN

PGandE employees identified in the inspection report who are assigned to an onsite or corporate emergency organization will be trained or retrained in compliance with company procedure on an aggressive schedule in order to restore compliance at an early date.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All current participants in the Emergency Plan identified in the inspection report are currently scheduled to make up any training or retraining deficiencies either through participation in the emergency exercise scheduled for October 30, 1984, or by completion of classroom work prior to that date. If any of these individuals do not meet this schedule due to a currently unanticipated inability to participate in the exercise, the deficiency will be remedied through completion of retraining by December 1, 1984.