

TESTIMONY  
OF  
HAROLD R. DENTON, DIRECTOR  
OFFICE OF NUCLEAR REACTOR REGULATION  
U.S. NUCLEAR REGULATORY COMMISSION

BEFORE THE  
SUBCOMMITTEE ON ENERGY AND THE ENVIRONMENT  
COMMITTEE ON INTERIOR AND INSULAR AFFAIRS  
UNITED STATES HOUSE OF REPRESENTATIVES

ON  
DIABLO CANYON LICENSING CONCERNS  
JUNE 14, 1984

CHAIRMAN PALLADINO HAS ASKED ME TO REPORT BRIEFLY ON WHAT STEPS  
REMAIN BEFORE A DECISION ON A FULL POWER OPERATION COULD BE MADE  
WITH RESPECT TO THE DIABLO CANYON NUCLEAR POWER STATION.

REMAINING ACTIVITIES INCLUDE THE TECHNICAL ISSUES RELATING TO  
PIPING AND SUPPORTS, PROGRAMMATIC QUALITY CONTROL CONCERNS,  
SEISMIC REEVALUATION PROGRAM, A FEW OUTSTANDING ISSUES FROM THE  
INDEPENDENT DESIGN VERIFICATION PROGRAM (IDVP), AND FOLLOW-UP TO  
A NUMBER OF OTHER MATTERS INCLUDING PETITIONS AND ALLEGATIONS.  
PG&E HAS BEEN REQUESTED TO PROVIDE ADDITIONAL INFORMATION ON A  
NUMBER OF THESE MATTERS.

THE STAFF, THEREFORE, HAS NOT REACHED RESOLUTION ON THESE ISSUES  
AT THIS TIME. LET ME ASSURE YOU THAT PRIOR TO APPROVAL OF ANY  
SUBSEQUENT LICENSING ACTIVITIES, THE STAFF WILL THOROUGHLY  
EVALUATE ALL APPROPRIATE MATTERS.

I WOULD NOW LIKE TO SUMMARIZE THE MORE PRINCIPAL OF THESE ISSUES.

THE CONCERNS RAISED BY MR. YIN FALL INTO TWO BROAD CATEGORIES:

(1) PROGRAMMATIC DESIGN CONTROL AND (2) TECHNICAL DESIGN ISSUES IN THE AREA OF PIPING SUPPORTS. THE SPECIALLY ASSIGNED NRC STAFF REVIEW GROUP AND THE ACRS HAVE BOTH EVALUATED THESE CONCERNS. THAT EVALUATION INCLUDED MEETINGS WITH THE LICENSEE TO DISCUSS THE CONCERNS AND TO RECEIVE THEIR EVALUATION AND COMMENTS.

IN ADDITION, THE REVIEW GROUP DISCUSSED CERTAIN MATTERS WITH THE IDVP PERSONNEL AND CONDUCTED WALKDOWNS OF THE DIABLO CANYON PLANT WITH REGARD TO SOME OF THE SPECIFIC TECHNICAL CONCERNS, SUCH AS SNUBBER AND RESTRAINT LOCATION AND REDUNDANCY. WHILE THEY CONCLUDED THAT NONE OF THESE CONCERNS WERE OF SUCH SAFETY SIGNIFICANCE AS TO FURTHER DELAY THE REINSTATEMENT OF THE LOW-POWER LICENSE, THEY ALSO CONCLUDED THAT CERTAIN ACTIONS BY THE LICENSEE AND BY THE NRC SHOULD BE COMPLETED PRIOR TO A DECISION REGARDING ISSUANCE OF A FULL-POWER LICENSE. THE ACRS CONCURRED WITH THIS CONCLUSION. (WHAT ACTIONS ARE THEY?)

THE COMMISSION REINSTATED THE LOW-POWER LICENSE AT A PUBLIC MEETING ON APRIL 13, 1984, WITH THE REINSTATEMENT BECOMING EFFECTIVE ON APRIL 19. THE ACTIONS PROPOSED BY THE REVIEW GROUP WERE ISSUED ON APRIL 18 AS SEVEN SPECIFIC LICENSE CONDITIONS IN AN ORDER MODIFYING THE DIABLO CANYON UNIT 1 LICENSE THAT MUST BE COMPLETED PRIOR TO FULL-POWER. THE STAFF HAS EXPANDED THIS REVIEW GROUP TO SEVERAL TASK TEAMS FOR THE REVIEW, EVALUATION, AUDIT AND INSPECTION OF THE LICENSEE'S EFFORTS. THE TASK TEAMS CONSIST OF 15 SENIOR PROFESSIONAL ENGINEERS INCLUDING BOTH NRC STAFF AND EXPERT CONSULTANTS. MR. YIN IS PARTICIPATING IN MANY OF THE TEAM ACTIVITIES. THE STAFF WILL ISSUE THE RESULTS OF ITS EFFORTS AS A SAFETY EVALUATION WHICH WILL SERVE AS ONE OF THE BASES FOR OUR FULL-POWER DECISION. WE EXPECT THAT THIS EFFORT WILL BE COMPLETED WITHIN ABOUT A MONTH.

ANOTHER MATTER THAT IS RECEIVING CONSIDERABLE ATTENTION IS GEOLOGICAL INFORMATION THAT RECENTLY BECAME AVAILABLE. IN MARCH 1984, THE LICENSEE PROVIDED US WITH A PREPRINT OF A SCIENTIFIC

PAPER REGARDING NEW INFORMATION AND INTERPRETATION OF DATA REGARDING THE HOSGRI FAULT NEAR THE DIABLO CANYON SITE. WE HAVE REQUESTED THE ACRS TO EVALUATE THE INFORMATION AND ADVISE US OF ITS IMPACT REGARDING A FULL-POWER DECISION. THE FULL ACRS COMMITTEE AND ITS CONSULTANTS ARE MEETING TODAY WITH THE LICENSEE, STAFF AND DR. CROUCH, THE PRINCIPAL AUTHOR OF THE PAPER.

IN ADDITION, THE STAFF IS CURRENTLY FORMULATING SPECIFIC DETAILS FOR A LONGER TERM REVALIDATION PROGRAM FOR THE SEISMIC DESIGN BASES OF THE DIABLO CANYON PLANT. THE NEED FOR SUCH PROGRAM WAS INITIALLY DISCUSSED BY THE ACRS IN 1978 AND IS NOW A CONDITION IN THE LOW-POWER LICENSE. THE PROGRAM MUST BE ESTABLISHED BY JANUARY OF NEXT YEAR AND BE COMPLETED BY 1988.

THE LAST SUBJECT I WANT TO MENTION IS THE MATTER OF ALLEGATIONS. THE STAFF HAS DEVOTED EXTENSIVE EFFORTS OVER THE PAST MONTHS TO EVALUATE ALLEGATIONS. SINCE EARLY NOVEMBER 1983, WE HAVE EXPENDED IN EXCESS OF 18,000 STAFF HOURS. OUR FUNDAMENTAL APPROACH IS TO FOCUS ON TWO BASIC QUESTIONS:

\*FIRST, DOES THE ALLEGATION PRESENT A TECHNICAL PROBLEM  
WHICH COULD AFFECT THE SAFETY OF THE PLANT?

\*SECOND, DOES THE ALLEGATION REVEAL ANY SIGNIFICANT DEFECTS  
IN THE LICENSEE'S OR HIS CONTRACTORS MANAGEMENT ON QUALITY  
SYSTEMS?

THE STAFF EVALUATED ALMOST ALL OF THE FIRST APPROXIMATELY 200  
ALLEGATIONS TO ADDRESS THESE QUESTIONS. MORE RECENTLY, SEVERAL  
HUNDRED ADDITIONAL ALLEGATIONS HAVE BEEN RECEIVED FROM A VARIETY  
OF SOURCES. AS THIS PICTURE EVOLVED THE STAFF DEVELOPED SCREENING  
CRITERIA TO DETERMINE WHICH ALLEGATIONS MUST BE COMPLETELY  
RESOLVED PRIOR TO EITHER LOW-POWER OR FULL-POWER OPERATION. AS A  
MINIMUM, EACH ALLEGATION IS BEING EVALUATED AGAINST THE CRITERIA.  
THESE CRITERIA ARE CONTAINED IN OUR SAFETY EVALUATION REPORT  
SUPPLEMENT 22.

USING THESE CRITERIA THE STAFF HAS IDENTIFIED ALLEGATIONS IN SEVERAL AREAS THAT REMAIN TO BE RESOLVED PRIOR TO FULL-POWER. ONE OF THESE AREAS IS PIPING AND SUPPORTS WHICH IS ALSO INCLUDED IN THE STAFF REVIEW TEAM EFFORT I DISCUSSED EARLIER. THE STAFF IS CONTINUING ITS ALLEGATION EVALUATION EFFORT AND WILL REPORT TO THE COMMISSION PRIOR TO A FULL-POWER DECISION ON DIABLO CANYON.

IN CLOSING, TWO OTHER ACTIONS SHOULD BE NOTED. THE FIRST IS THE DECISION BY THE APPEAL BOARD IN MARCH REGARDING MATTERS OF DESIGN QUALITY ASSURANCE. THAT DECISION WAS FAVORABLE TO THE LICENSEE. THE SECOND ITEM IS A NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF A CIVIL PENALTY FOR \$50,000 RESULTING FROM THE FACILITY STAFF NOT RECOGNIZING FOR A PERIOD IN EXCESS OF 15 HOURS THE INOPERABLE STATUS OF THE EMERGENCY CORE COOLING SYSTEM.

MR. CHAIRMAN, THIS CONCLUDES MY REMARKS.



OPENING REMARKS  
OF  
NUNZIO J. PALLADINO  
CHAIRMAN  
U.S. NUCLEAR REGULATORY COMMISSION

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