

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) DIABLO CANYON UNIT 1										DOCKET NUMBER (2) 0 5 0 0 0 2 1 7 1 5										PAGE (3) 1 OF 0 1 2	
TITLE (4) TEMPORARY CHANGES TO PROCEDURES NOT REVIEWED BY PLANT STAFF REVIEW COMMITTEE WITHIN 14 DAYS																					
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)											
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES			DOCKET NUMBER(S)									
0 7	1	2 8	5 8	5	0 2	4	0 0	0 9	0 3	8	5	DIABLO CANYON UNIT 2			0 5 0 0 0 3 2 3						
															0 5 0 0 0						
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §. (Check one or more of the following) (11)																			
1		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)							
POWER LEVEL (10)		20.405(a)(1)(i)				50.38(c)(1)				50.73(a)(2)(v)				73.71(c)							
1 0 0		20.405(a)(1)(ii)				50.38(c)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 365A)							
		20.405(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)											
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)											
		20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)											
LICENSEE CONTACT FOR THIS LER (12)																					
NAME DAVID P. SISK, REGULATORY COMPLIANCE ENGINEER										TELEPHONE NUMBER AREA CODE 8 0 5 5 9 5 - 7 3 5 1											
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																					
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC											
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR							
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO											

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

Three temporary changes [On-the-Spot Changes (OTSCs)] to safety-related procedures (one for Unit 1, one for Unit 2, and one for both units) were not reviewed by the Plant Staff Review Committee (PSRC) and approved by the plant manager within the 14-day time limit of Technical Specification (T.S.) 6.8.3. The first reportable event was discovered on August 1, 1985. All three events were discovered during a review of current OTSCs conducted by the plant Document Control Department. The OTSC review was initiated at the request of the Technical Review Group (TRG) that was investigating a 1984 unreviewed OTSC not covered by the T.S. 6.8.3 requirement. All three OTSCs were reviewed by the PSRC and approved by the Plant Manager on discovery of the events.

These events are attributed to an April 1985 change in the OTSC processing procedure and by plant personnel not following the new distribution requirements for processing OTSC forms.

To prevent recurrence, Administrative Procedure E-4S4 has been revised, clerical personnel will be properly trained, and document review instructions have been amended.

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## - LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
DIABLO CANYON UNIT 1	0 5 0 0 0 2 7 5	8 5	0 2 4	0 0	0 2	OF 0 2

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Three temporary changes [On-the-Spot Changes (OTSCs)] to safety-related procedures (one for Unit 1, one for Unit 2, and one for both units) were not reviewed by the Plant Staff Review Committee (PSRC) and approved by the Plant Manager within the 14-day time limit of Technical Specification (T.S.) 6.8.3. The 14-day time limit was exceeded on July 12, 1985 for one OTSC discovered on August 1, and on July 31, 1985 for two OTSCs discovered on August 13. These events were discovered during a review of current OTSCs conducted by the plant Document Control Department. The OTSC review was initiated at the request of the Technical Review Group (TRG) that was investigating a 1984 unreviewed OTSC not covered by the T.S. 6.8.3 requirement. Because the 1984 OTSC had been discovered by chance while preparing another OTSC for the same procedure, the TRG decided to initiate a review of outstanding OTSCs for the principal users of OTSCs, i.e., Operations, Maintenance, and Engineering. This review disclosed the three reportable events covered by this report. The OTSCs were prepared for (1) Surveillance Test Procedure STP R-19, Rev. 4, "Shutdown Margin Documentation" and (2) Operating Procedure OP F-2:VI, Rev. 4, "CCW System Alignment Verification for Plant Startup."

These events were caused by an April 1985 change in the OTSC processing procedure and by plant personnel not following the new procedure for processing OTSC forms. Failure to perform initial distribution to the Document Control Department prevented the logging and tracking of the 14-day PSRC review requirement.

All three OTSCs were reviewed by the PSRC and approved by the Plant Manager on discovery of the events. The OTSCs were determined to be correct and no adverse consequences could have occurred as a result of the changes.

To prevent recurrence, the following actions have been taken: (1) Administrative Procedure E-4S4, "Issuance and Approval of On-The-Spot Changes to Procedures," has been revised to more clearly delineate the processing steps and reference back to the procedure, although the previous revision would have been adequate for processing OTSCs if it had been followed, (2) clerical personnel will be trained in the proper processing and filing responsibilities of Administrative Procedure E-4S4 by September 30, 1985, and (3) because the OTSC review also found materials in the plant manuals that were not identified on the list of effective procedures used for the review, the document review instructions have been amended to ensure that all discrepancies, including additional material, within a controlled volume are identified to the Document Control Department immediately.

# PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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JAMES D. SHIFFER  
VICE PRESIDENT  
NUCLEAR POWER GENERATION

September 3, 1985

PGandE Letter No.: DCL-85-290

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Licensee Event Report 85-024-00  
Temporary Changes to Procedures Not Reviewed By Plant Staff  
Review Committee Within 14 Days

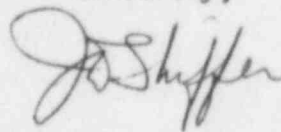
Gentlemen:

Pursuant to 10 CFR 50.73(a)(2)(i)(B), PGandE is submitting the enclosed Licensee Event Report concerning a condition not permitted by Technical Specifications. Temporary changes to procedures were not reviewed by the Plant Staff Review Committee within 14 days as is required by Units 1 and 2 Technical Specification 6.8.3.

These events have in no way affected the public's health and safety.

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

Sincerely,



Enclosure

cc: L. Chandler  
J. B. Martin  
B. Norton  
CPUC

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