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PACIFIC GAS AND ELECTRIC COMPANY

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JAMES D. SHIFFER  
VICE PRESIDENT  
NUCLEAR POWER GENERATION

REGION

February 18, 1986

PGandE Letter No.: DCL-86-038

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

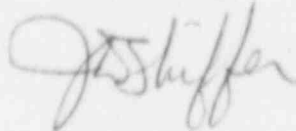
Re: Docket No. 50-275, OL-DPR-80  
Diablo Canyon Unit 1  
Response to IEIR 50-275/85-44 -- Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 50-275/85-44, dated January 16, 1986, contained a Notice of Violation citing a Level V 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: L. J. Chandler  
R. T. Dodds  
B. Norton  
H. E. Schierling  
S. A. Varga  
CPUC  
Diablo Distribution

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## ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN  
NRC INSPECTION REPORT 50-275/85-44

On January 16, 1986, NRC Region V issued a Severity Level V Notice of Violation (Notice) as part of NRC Inspection Report 50-275/85-44 for Diablo Canyon Unit 1. This Notice cited a concern over a physical inventory of fuel assemblies in Unit 1 that was conducted at an interval in excess of 12 months.

STATEMENT OF VIOLATION

"During an NRC inspection conducted December 17 through 19, 1985, one violation of an NRC requirement was identified. The violation concerned the untimely frequency of a Special Nuclear Material inventory. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Action," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

NRC requirement 10 CFR 70.51 Part (d) states in part, '...each licensee who is authorized to possess at any one time and location special nuclear material in a quantity totaling more than 350 grams of contained uranium-235... shall conduct a physical inventory of all special nuclear material in his possession under license at intervals not to exceed twelve months.' Diablo Canyon Power Plant Station Procedures, Administrative Procedures, APD-7S1 page 7 (revision 0) under (4) Inventories states in part, '1) All SNM at intervals not to exceed 12 months.'

Contrary to the above requirements, physical inventory of fuel assemblies in Unit 1 was conducted at an interval in excess of twelve months. A physical inventory was conducted on November 21, 1983 and was followed by the next physical inventory conducted on January 25, 1985.

This is a Severity Level V Violation (Supplement III)"

EXPLANATION AND CORRECTIVE STEPS TAKEN

The violation as stated in Inspection Report 50-275/85-44 is correct. The elapsed time between the Unit 1 physical inventories of fuel assemblies dated November 21, 1983 and January 25, 1985 was 14 months.

In response to a previous NRC Inspection of Unit 2 special nuclear material (SNM) records which was conducted January 22-25 and February 11 and 15, 1985 (50-323/85-01, dated March 13, 1985), PGandE took prompt corrective actions. These corrective actions consisted of performing a SNM physical inventory for both Units 1 and 2 on January 25, 1985, and revising Administrative Procedure APD-7S1, "Control and Accountability of Special Nuclear Material," to clarify that SNM physical inventories be conducted at intervals not to exceed 12 months in accordance with 10 CFR 70.51(d). This procedure revision was approved by the Plant Staff Review Committee on March 28, 1985.

All appropriate corrective actions were promptly completed by March 28, 1985, approximately 8-1/2 months prior to the time of Inspection Report 50-275/85-44. PGandE believes the above information may not have been adequately considered by the NRC inspection team in Inspection Report 50-275/85-44.

CORRECTIVE STEPS WHICH WILL BE TAKEN

No additional corrective actions are proposed to be taken.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.