

September 5, 1985

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Mr. J. D. Shiffer, Vice President
Nuclear Power Generation
Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94106

Dear Sir:

The Attached allegations are being submitted to PG&E for evaluation, investigation, and response.

For the allegations forwarded by this letter, the NRC must be apprised in writing, of the results of the PG&E investigation, the necessary corrective action, and the expected completion date. We request that your response be titled with the appropriate allegation number. Your response shall be evaluated by the staff for clarity, comprehensiveness, and substance. The response is subject to verification by the staff. You will be advised of the staff's position upon completion of the staff's evaluation. Your written response is required within 30 days of receipt of this letter.

If you have any questions, or require additional information, please call the Region V office.

Sincerely,

D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects

Attachment: As stated

cc: Jim Knight, NRR
S. D. Skidmore, PG&E
R. C. Thornberry, Plant Manager
P. A. Crane, Jr.
D. Taggart, Supervisor, Quality Assurance
R. Weinberg, News Services
State of CA

bcc: D. Kirsch
ATS No. RV-85-A-043
RSP/DCD/RIDS ✓

RMEEKS: jbr DKirsch
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ATTACHMENT

A. Allegation No. 1722

Allegation Tracking System No. RV-85-A-043

Description/Characterization - An allegor asserts that design changes were accomplished, from 1970 to 1976, in the course of implementing corrective actions to Pullman Discrepancy Reports with the result that such field initiated design changes were not subjected to design control measures commensurate with the original design and approved by the organization that performed the original design, as required by 10CFR50, Appendix B, Criterion III.

Further, the allegor asserts that (1) Pullman Discrepancy Reports are only reviewed and approved by the PG&E Resident Mechanical Engineer who, most probably, had not been designated by PG&E as the responsible organization to review and approve design changes; (2) PG&E did not include any quality assurance requirement in Contract Specification No. 8711 for the control of field initiated design changes; and (3) PG&E had no method to control field design changes and fell back on the use of Pullman Discrepancy Reports to handle the problem.

B. Allegation Nos. 1723, 1724

Allegation Tracking System No. RV-85-A-043

Description/Characterization - An allegor asserts that walkdowns performed by Pullman in 1984, on Unit 2 systems were incomplete and not well managed. In support of his assertions the allegor indicates the following:

- (1) piping inside the Unit 1 protected area was not walked-down because many of those individuals performing the walkdowns of systems did not have Unit 1 access authorization;
- (2) Unit 2 systems walkdowns were performed without the benefit of an approved procedure;
- (3) QC was not formally involved with the walkdowns for turnover of systems;
- (4) QA/QC deficiencies found during the systems walkdowns were only reported on memoranda or by "word-of-mouth" instead of by QA/QC documentation such as Deficient Condition Notices or Discrepancy Reports and the memoranda probably were not saved as a QA/QC record; and

- (5) The walkdowns were conducted in some cases without the use of current drawings. For example, an out-of-date Revision 2 of the Pullman Hanger Isometric drawing was used for the May 1984 walkdown of the CVCS system because PG&E had not yet approved the most recent revision of the hanger isometric, which had been submitted to PG&E for approval on January 17, 1977.

C. Allegation No. 1725

Allegation Tracking System No. RV-85-A-043

Description/Characterization - An allegor asserts that he is personally familiar with cases where conduit and electrical panels in the intake structure were damaged by carbon arcing.