UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064
March 2, 1998

EA 98-035

Harold B. Ray, Executive Vice President
Southern California Edison Co.
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: NRC INSPECTION REPORT 50-361/97-22; 50-362/97-22 AND NOTICE OF VIOLATION

Dear Mr. Ray:

An NRC inspection was conducted December 1-5, 1997, at your San Onofre Nuclear Generating Station, Units 2 and 3, reactor facilities. Following the inspection, an exit meeting was held to provide the inspection findings to Mr. R. Krieger, Mr. D. Nunn, and other members of your staff. Your staff submitted additional docketed information, dated January 2, 1998, regarding the inspection findings. Subsequently, in-office inspection was conducted until February 2, 1998, and a supplemental telephonic exit was held with your staff on that date. The purpose of the inspection was to assess your program implementation for meeting the requirements of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants [the Maintenance Rule]." The enclosed report presents the scope and results of that inspection.

The inspection results revealed that you had developed and implemented a program that generally met the requirements of 10 CFR 50.65. We have reviewed the supplemental information submitted by your staff, and have concluded that there are two NRC-identified violations of the Maintenance Rule. The bases for our conclusions are documented in Sections M1.1 and M1.6 of the enclosed report. In addition, a noncited violation was identified that involved the failure to develop and implement performance criteria to adequately monitor the function of the unit containment polar cranes to safely lift and transport heavy loads over safety-related equipment and irradiated fuel. This condition was identified and corrected by your staff in October 1997.

Violation A identified the failure to include the nonradioactive sumps in the scope of your Maintenance Rule program. The emergency operating instructions require this system to be manipulated to mitigate a radioactive release during emergency conditions, and effective maintenance of this equipment needs to be assured. Violation B identified two examples of inadequate performance criteria to monitor the effectiveness of maintenance on the instrument

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air system and the containment isolation pseudo system. A failure to properly monitor and assure proper maintenance may jeopardize the successful performance of system functions when performance is demanded. However, the additional information you submitted stated an intent to modify the performance criteria for these two systems. The team reviewed the new performance criteria and determined that they were appropriate. Therefore, you are not required to respond to the second violation.

The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding the violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. Again, you are not required to respond to Violation 50-361;-362/9722-03. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without a redaction.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Dale A. Powers

for Arthur T. Howell III, Director
Division of Reactor Safety

Docket Nos: 50-361; 50-362
License Nos.: NPF-10; NPF-15

Enclosures:
1. Notice of Violation
2. NRC Inspection Report
   50-361/97-22; 50-362/97-22

cc w/enclosures:
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E-Mail report to T. Frye (TJF)
E-Mail report to D. Lange (DJL)
E-Mail report to NRR Event Tracking System (IPAS)
E-Mail report to Document Control Desk (DOCDESK)
E-Mail report to Richard Correia (RPC)
E-Mail report to Frank Talbot (FXT)

bcc to DCD (IE01)

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