ENCLOSURE 1

NOTICE OF VIOLATION

Southern California Edison Co.
San Onofre Nuclear Generating Station

Docket Nos.: 50-361; 50-362
License Nos.: NPF-10; NPF-15
EA 98-035

During an NRC inspection conducted on December 1-5, 1997, with inoffice inspection continuing until February 2, 1998, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

A. 10 CFR 50.65(b)(2) requires, in part, that the scope of the monitoring program specified in paragraph (a)(1) shall include certain nonsafety-related structures, systems, or components that are relied upon to mitigate accidents or transients, or are used in plant emergency operating procedures. 10 CFR 50.65(c) states that the requirements of this section shall be implemented by each licensee no later than July 10, 1996.

Contrary to the above, on July 10, 1996, nonsafety-related (normally) nonradioactive sumps system was not included in the licensee's 10 CFR 50.65 monitoring program scope. The system is manipulated in Emergency Operating Instruction SO23-12-4, "Steam Generator Tube Rupture," Step 22, to mitigate a radioactive release during a steam generator tube rupture event.

This is a Severity Level IV violation (Supplement I) (50-361;-362/9722-01).

B. 10 CFR 50.65(a)(1) requires, in part, that the holders of an operating license shall monitor the performance or condition of structures, systems or components, as defined in 10 CFR 50.65(b), against licensee-established goals, in a manner sufficient to provide reasonable assurance that such structures, systems, or components are capable of fulfilling their intended functions. When the performance or condition of a structure, system, or component does not meet established goals, appropriate corrective action shall be taken.

10 CFR 50.65(a)(2) requires, in part, that monitoring as specified in 10 CFR 50.65(a)(1) is not required where it has been demonstrated that the performance or condition of a structure, system, or component is being effectively controlled through the performance of appropriate preventive maintenance, such that the structure, system, or component remains capable of performing its intended function. 10 CFR 50.65(c) states that the requirements of this section shall be implemented by each licensee no later than July 10, 1996.

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Contrary to 10 CFR 50.65(a)(2), as of July 10, 1996, the time that the licensee elected to not monitor the performance or condition of certain structures, systems or components against licensee-established goals pursuant to the requirements of Section (a)(1), the licensee had not demonstrated that the performance or condition of certain structures, systems or components within the scope of 10 CFR 50.65 had been effectively controlled through the performance of appropriate preventive maintenance, as evidenced by the following examples:

1. The licensee failed to demonstrate that the performance of the containment integrity function was being effectively controlled through the performance of appropriate preventive maintenance on the high safety-significant containment isolation valves in accordance with the requirements of 10 CFR 50.65(a)(2). Specifically, the licensee failed to demonstrate it had established adequate measures to evaluate the effectiveness of preventive maintenance on the containment isolation valves prior to placing them under Section (a)(2), in that a functional failure of a containment isolation valve, due to test leakage, was not recognizable until a limit imposed by Technical Specification 3.6.1 was reached. Allowing containment isolation valves to reach such a state before taking corrective actions would not demonstrate that preventive maintenance was effective to control their performance or condition to maintain the containment integrity function.

2. The licensee failed to demonstrate that the performance of the low safety-significant instrument air system was being effectively controlled through the performance of appropriate preventive maintenance in accordance with the requirements of 10 CFR 50.65(a)(2). Specifically, the licensee failed to demonstrate it had established adequate measures to evaluate the effectiveness of preventive maintenance on the instrument air system compressors prior to placing them in Category (a)(2), in that the licensee had established plant level reliability performance measures that could not demonstrate that the instrument air compressors would function as required. This is because the complete instrument air system would have to have been nonfunctional before the plant level reliability performance measures would be affected.

This is a Severity Level IV violation (Supplement I) (50-361;-362/9722-03).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Co. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should address the following elements only for Violation A: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps

that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

The NRC has concluded that information regarding the reason for the Violation B, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved is already adequately addressed in Enclosure 2. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas
this 2nd day of March 1998