UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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June 3, 2005

Mr. 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 050-00206/05-009

Dear Mr. Ray:

An NRC inspection was conducted on May 2-5, 2005, at your San Onofre Nuclear Generating Station, Unit 1 facility. This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspection included an examination of selected procedures and representative records, observations of activities, and interviews with personnel. The enclosed report presents the results of that inspection. The inspection determined that you are conducting decommissioning activities in compliance with regulatory and license requirements, with one exception.

Based on the results of this inspection, the NRC noted a licensee-identified violation involving the failure to conduct an adequate radiation survey which led to a failure to post a high radiation area. The violation is being treated as a non-cited violation (NCV), consistent with Section VI.A of the NRC Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Senior Resident Inspector at the San Onofre Nuclear Generating Station facility.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, please contact the undersigned at (817) 860-8191 or Mr. Robert J. Evans, Senior Health Physicist, at (817) 860-8234.

Sincerely,

/RA/

D. Blair Spitzberg, Ph.D., Chief
Fuel Cycle and Decommissioning Branch

Docket No.: 050-00206
License No.: DPR-13

Enclosure:
NRC Inspection Report
050-00206/05-009

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No:	050-00206
License No:	DPR-13
Report No:	050-00206/05-009
Licensee:	Southern California Edison Co. P.O. Box 128 San Clemente, California 92674
Facility:	San Onofre Nuclear Generating Station, Unit 1
Location:	San Clemente, California
Dates:	May 2-5, 2005
Inspectors:	Robert J. Evans, P.E., C.H.P., Senior Health Physicist Fuel Cycle & Decommissioning Branch James C. Shepherd, Senior Project Manager Decommissioning Directorate Division of Waste Management and Environmental Protection Office of Nuclear Material Safety and Safeguards
Approved By:	D. Blair Spitzberg, Ph.D., Chief Fuel Cycle & Decommissioning Branch
Attachment:	Supplemental Inspection Information
ADAMS Entry:	IR05000206-05-009 on 05/02/2005 - 05/05/2005; Southern California Edison Co., San Onofre Nuclear Generating Station; Unit 1. Decommissioning Report. One NCV.

EXECUTIVE SUMMARY

San Onofre Nuclear Generating Station, Unit 1
NRC Inspection Report 050-00206/05-009

This inspection was a routine, announced inspection of decommissioning activities being conducted at San Onofre Nuclear Generating Station, Unit 1 facility. Areas inspected included safety reviews, design changes, and modifications; self-assessments, auditing, and corrective action; maintenance and surveillance; decommissioning performance and status review; and followup of a licensee event notification. Overall, the licensee conducted decommissioning in accordance with regulatory and procedural requirements with one exception described below.

Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors

- The licensee's safety review and design change program was in compliance with 10 CFR 50.59 and Post Shutdown Decommissioning Activities Report requirements (Section 1).

Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors

- The licensee conducted self-assessments and audits in accordance with quality assurance program requirements (Section 2).

- A non-cited violation was documented involving the licensee's failure to conduct an adequate radiological survey which led to a failure to post a high radiation area. The licensee identified the problem and took prompt corrective actions (Section 2).

Maintenance and Surveillance at Permanently Shutdown Reactors

- The licensee conducted its final release of liquid effluent using permanent plant equipment in accordance with procedures and release permit requirements (Section 3).

Decommissioning Performance and Status Review at Permanently Shutdown Reactors

- The radiologically restricted area was adequately controlled. Postings, signs, and radiological boundaries were in compliance with regulatory requirements (Section 4).

- The licensee continued to make progress with the remediation of the turbine building structure. Confirmatory surveys were conducted, and no residual radioactive material was identified on the turbine building surfaces (Section 4).

Followup

- During February 2005, the licensee reported a leaking plutonium-beryllium neutron source to the NRC. The licensee plans to ship the leaking source to the Department of Energy/Los Alamos National Laboratory in the near future for permanent disposal (Section 5).

Report Details

Summary of Plant Status

San Onofre Nuclear Generating Station, Unit 1 was permanently shut down during November 1992 and was permanently defueled by March 1993. The unit remained in SAFSTOR until June 1999, when decommissioning was initiated. At the time of this inspection, the licensee was conducting decommissioning activities under the DECON option as stated in its Post Shutdown Decommissioning Activities Report (PSDAR) dated December 15, 1998. DECON is defined as the immediate removal and disposal of all radioactivity in excess of levels which would permit the release of the facility for unrestricted use.

Work completed since the previous inspection included final drain-down of the spent fuel pool (SFP). Equipment permanently removed and disposed included the remaining reactor coolant system piping and reactor vessel supports from containment, the SFP racks from the fuel handling building, the turbine gantry crane from the turbine building, and the condensate storage tank and oily waste separator from the yard. Plant systems permanently removed from service since the last inspection but still in place included the control room area radiation monitor, the fuel handling building area radiation monitor, SFP leak detection wells, SFP cooling and cleanup system, and the refueling water storage tank support equipment.

Work in progress during the inspection included demolition of the containment interior. The licensee also drained the remaining waste water from the center holdup tank to the environment through the liquid radwaste discharge piping. This release may be the final liquid effluent release from Unit 1 using the original radwaste system components. In the near future, the licensee plans to permanently remove the remaining ion exchange resin from the radwaste system and commence with decommissioning of the radwaste system.

On or about May 16, 2005, the licensee plans to permanently discontinue manning of the Unit 1 control room. Amendment 163 to Facility Operating License No. DPR-13 allowed the licensee to reduce a number of operational and administrative requirements, including the organizational structure, following the permanent removal of spent fuel from the SFP. Since the Unit 1 SFP has been permanently drained and the radwaste system is about to be removed from service, the licensee concluded that there was no longer a need to continuously man the Unit 1 control room. Remaining Unit 1 equipment will be operated and inspected by Unit 2 operators (or by Unit 3 operators during Unit 2 outages). The Unit 2 control room will be responsible for monitoring the remaining Unit 1 alarms via a laptop computer located in the Unit 2 control room. Any problems or alarms identified in Unit 1 will be investigated by Unit 2 operations personnel. In addition, the Unit 2 control room will be responsible for maintaining the Unit 1 logbook.

1 Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors (37801)

1.1 Inspection Scope

The purpose of this portion of the inspection was to ascertain whether design changes, tests, experiments, and modifications were effectively reviewed, conducted, managed,

and controlled during plant decommissioning in accordance with 10 CFR 50.59 and the PSDAR.

1.2 Observations and Findings

Regulation 10 CFR 50.59 addresses the change control process, a process used by the licensee to determine if a proposed change to the facility, procedures, tests, or experiments is subject to a license amendment and NRC approval. The process is implemented through site procedure SO123-XV-44, "10 CFR 50.59 and 72.48 Program." This procedure provided instructions for both initial screening and subsequent full evaluation, if necessary, of facility or procedure changes to confirm if the licensee can implement these changes without NRC approval. The program was a common program for the two operating units and the decommissioning unit.

The inspectors reviewed randomly selected 10 CFR 50.59 screens of various facility changes and found that all screens had been completed in accordance with procedural requirements. The screens were independently reviewed by a person other than the preparer. The inspectors found that the screens provided sufficient summary information to explain what was being changed and why. Furthermore, the responses to the screening criteria adequately addressed the criteria questions from a technical perspective.

No full 10 CFR 50.59 evaluations had been performed for Unit 1 changes since the last inspection, and the inspectors did not identify any 10 CFR 50.59 screens that should have been processed as full evaluations.

The inspectors also reviewed six randomly selected engineering change packages of various facility changes and found that all packages had been completed in accordance with procedural requirements. The engineering change packages provided sufficient technical detail to support the proposed changes.

The inspectors noted that the licensee had submitted an application to the State of California to decommission the off-shore cooling water system prior to license termination. This proposed action was not specifically addressed in the PSDAR. The inspectors discussed the proposed action with the licensee. The licensee agreed to consider the action as a partial site release. Further, a change to the PSDAR may be appropriate in accordance with 10 CFR 50.82(a)(7) prior to the implementation of the proposed action. At the end of the onsite inspection, the licensee was still contemplating its options. The review of any proposed change to the PSDAR or partial site release will be conducted by the NRC following formal submittal to the NRC.

1.3 Conclusions

The licensee’s safety review and design change program was in compliance with 10 CFR 50.59 and PSDAR requirements.

2 Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors (40801)

2.1 Inspection Scope

The objective of this portion of the inspection was to evaluate the effectiveness of licensee controls in identifying, resolving, and preventing issues that degrade safety or the quality of decommissioning.

2.2 Observations and Findings

The licensee conducted several different types of self-assessments to help to ensure compliance with regulatory requirements and license conditions. The self-assessments included use of review committees, internal reports, and leadership observations. The requirements for some self-assessments are provided in the Quality Assurance (QA) Program Topical Report SCE-1-A, Amendment 22.

The Onsite Review Committee functions to advise the vice president, nuclear generation on all matters related to nuclear safety. The Committee is required by Section 17.2.20.2 of QA Program Topical Report SCE-1-A. The Committee is required to meet quarterly, although records indicate that the Committee met at least monthly since the previous inspection of this program area. Each meeting included a review of Unit 1 operations and events.

The Nuclear Safety Group provided independent review of selected activities and is required by Section 17.2.20.4 of the QA Program Topical Report. The Nuclear Safety Group's quarterly reports for the third and fourth quarters of 2004 and first quarter of 2005 were reviewed during the inspection. Unit 1 decommissioning activities reviewed by the Nuclear Safety Group included conduct of QA surveillances and compliance with Unit 1 Offsite Dose Calculation Manual requirements.

The Nuclear Oversight Board was used by the licensee to provide high-level review of site operations. The Board is not required by the Unit 1 license or the QA Topical Report. The Board conducted a review of Unit 1 decommissioning during February 2005. Strengths and focus areas were identified and presented to the licensee for consideration.

Unit 1 decommissioning project self-assessment reports were developed and issued quarterly. The reports provided critical analyses of performance indicators and trends. Positives included personnel safety and radiation exposure control. Improvement areas included delays in selected decommissioning projects.

The licensee used leadership observations to provide direct oversight of decommissioning activities. The licensee believed that the leadership observation data could be used as a tool for early identification of potentially unsafe behavior trends. During the first quarter of 2005, the licensee conducted 869 leadership observations. About half of the observations involved human performance. Although no negative trends were observed by the licensee, according to the licensee's documentation the

data for 2005 suggested that additional oversight was warranted in the areas of housekeeping, document preparation, and self-checking.

Routine QA audits are required by Section 17.2.18.2 of the QA Program Topical Report. Program areas audited on a biennial basis included Unit 1 license compliance, quality assurance programs, training, corrective action programs, and fire protection. Several recent program audits and surveillances were reviewed, including surveillances of the health physics program. The licensee was found to be conducting these reviews in accordance with QA program requirements, and these reviews provided useful information to licensee management.

The inspectors conducted a detailed review of the corrective actions associated with Action Request 050201575. This action request was issued to examine the apparent cause evaluation of an incident that occurred on February 24, 2005, following a resin transfer. A radiological survey of the resin transfer piping was conducted to ensure that all residual radioactive material had been flushed from the line. No areas were identified which met the definition of a high radiation area, and the high radiation area postings were removed from the Unit 1 bailing room. About 2 hours after the posting was lifted, a second member of the licensee's staff identified a discrete area where the dose rate exceeded 100 millirems per hour at 30 centimeters, the requirement for posting as a high radiation area.

The failure to conduct an adequate survey was a violation of 10 CFR 20.1501 which led to a failure to post a high radiation area, a violation of 10 CFR 20.1601 (050-00206/0509-01). This violation is being treated as a non-cited violation (NCV) in accordance with Section VI.A of the NRC Enforcement Policy, in part, because it was licensee identified and was entered into the licensee's corrective action program. Corrective actions included re-posting the area as a high radiation area, flushing the line a second time to remove the residual resin material, and revising the system procedure to ensure that the piping has been completely flushed during future resin transfers. The inspectors concluded that the licensee's review of the incident was thorough and included apparent causes and corrective actions to prevent recurrence.

2.3 Conclusions

The licensee conducted self-assessments and audits in accordance with QA program requirements. An NCV was noted involving the licensee's failure to conduct an adequate radiological survey which led to a failure to post a high radiation area. The licensee identified the problem and took prompt corrective actions.

3 Maintenance and Surveillance at Permanently Shutdown Reactors (62801)

3.1 Inspection Scope

The inspectors observed the performance of selected maintenance and surveillance activities to verify if structures, systems, and components were being maintained in compliance with Offsite Dose Calculation Manual instructions and procedural requirements.

3.2 Observations and Findings

During the inspection, the licensee conducted its final release of waste water through the liquid radwaste system. About 32,000 gallons of fluid being stored in the center holdup tank was released to the environment. Prior to release, the licensee sampled the water for measurement of radioactive material concentrations. The sample results were used to generate a release permit, No. 5L-022-1. The release permit provided the alarm setpoint for the liquid radwaste monitor R-1218, the maximum release rate, and the minimum dilution flow rate.

The inspectors confirmed that the operator readjusted the alarm setpoint as specified in the release permit. The release rate was about 32 gallons per minute (gpm), slightly below the maximum release flow of 35 gpm. The release was diluted by 13,000 gpm of flow with a minimum dilution flow rate of 10,000 gpm. The licensee conducted the release in accordance with instructions provided in the release permit and the Operating Instruction SO1-5-16, “Holdup Tank Release.” The release occurred without incident.

At the end of the inspection period, the licensee still had about 9,000 gallons of fluid remaining in several system tanks. The remaining water will be used to flush system piping. The fluid will eventually be released to the environment if sample results are acceptable; otherwise, the water will be processed using temporary equipment. The licensee is expected to permanently discontinue the use of all remaining liquid radwaste system components in the near future, including liquid radwaste monitor R-1218. Temporary radwaste equipment will be used as necessary prior to any future releases to the environment.

3.3 Conclusions

The licensee conducted its final release of liquid effluent using permanent plant equipment in accordance with plant procedures and release permit requirements.

4 Decommissioning Performance and Status Review at Permanently Shutdown Reactors (71801)

4.1 Inspection Scope

The inspectors evaluated whether the licensee and its contracted workforce were conducting decommissioning activities in accordance with license and regulatory requirements.

4.2 Observations and Findings

a. Site Tours/Control of Decommissioning Activities

The inspectors conducted tours of the Unit 1 facility to observe radiological area postings and boundaries. Access to the restricted and contaminated areas was controlled by radiation caution signs, barricades, boundary lines, locked doors, and locked gates. Radiological boundaries were well defined and postings were up-to-date

in all areas. The inspectors observed a noticeable reduction in the amount of radioactive wastes and equipment being stored in and around the former turbine building. This was indicative that progress was being made by the licensee towards the eventual free-release of the structure.

During March 2005, the licensee commenced with decommissioning of the Unit 1 water reservoir, formerly a source of fire protection water. Prior to decommissioning, the licensee collected 12 soil, asphalt, and sediment samples to ensure that the area did not contain residual radioactive material. The inspectors conducted a review of the sample results. The samples contained only naturally occurring radioactive material. No licensed radioactive material was identified in the samples. These sample results confirmed that the former Unit 1 reservoir was not contaminated with radioactive material originating from previous plant operations.

b. Radiological Survey of Turbine Building Structure

The inspectors conducted confirmatory surveys of portions of the turbine building to ensure that the structure had been properly remediated. The licensee planned to commence with demolition of the structure during June 2005. The inspectors conducted random surveys of the upper deck, west heater deck, and ground elevation deck. The inspectors conducted the surveys using an Eberline E600 survey meter (NRC No. 063472 with calibration due date of December 8, 2005) with a beta radiation probe.

The inspectors obtained background measurements from unimpacted areas outside of the radiologically restricted area. The average background measurement for beta particles was 192 counts per minute (cpm). The inspectors conducted thirty 1-minute samples on both concrete and metal surfaces. The survey results ranged from 119 counts per minute (cpm) on a metal plate to 390 cpm on concrete in the northeastern corner of the upper deck area. The highest measurement (390 cpm) was obtained in an area that exhibited high background measurements because of radioactive materials being stored nearby in the containment sphere. In summary, no radioactive material was identified on turbine building surfaces in quantities that were distinguishable from background values.

During the inspection, discussions were held with the licensee on its plans for release of the turbine building substructure and other components located below ground elevation. The licensee recently grouted components with low-level radioactivity, including the reheater pit sump, floor drains and building expansion joints, and plans to grout additional areas in the future. All substructures and grouted components are scheduled to be removed in conjunction with final site decommissioning concurrent with decommissioning of Units 2 and 3. The inspectors reviewed the licensee's plans and agreed that the phased decommissioning approach was in agreement with commitments made in the PSDAR.

The licensee indicated that it may decide, in conjunction with the eventual submittal of the License Termination Plan, to leave these substructure components in place. Further, the licensee was considering the release of the intake/outfall piping prior to submittal of the License Termination Plan. These actions were not discussed in the PSDAR; therefore, the PSDAR may need updating prior to initiating such actions.

Release of the intake/discharge piping will require NRC review and approval as a partial site release. The licensee agreed to review the proposed actions and to submit the changes to the NRC for review as required.

4.3 Conclusions

The radiologically restricted area was adequately controlled. Postings, signs, and radiological boundaries were in compliance with regulatory requirements. The licensee continued to make progress with the remediation of the turbine building structure. Confirmatory surveys were conducted, and no residual radioactive material was identified on the turbine building surfaces.

5 Followup (92701)

5.1 (Discussed) Licensee Event Report 050-00206/0509-02: Leaking Sealed Source

On February 23, 2005, the licensee submitted its 2004 Annual Sealed Source Leakage Report and informed the NRC that a 5-curie plutonium-beryllium sealed source was leaking. The leaking source was a 74-gram neutron source, No. MRC-N-SS-W-PuBe-463 (Monsanto Research Corporation, Neutron source, Stainless Steel container, Welded seal, Plutonium-239/Beryllium isotope, Serial Number 463). Sample results indicate that the amount of removable contamination was 1.35 microcuries with a reporting limit of 0.005 microcuries.

The plutonium-beryllium source was installed in Unit 1 about 1971 for use as a boron analyzer. During August 2004, the licensee attempted to remove the source as part of routine decommissioning, but during removal, the licensee recognized that the source container was cracked. Action Request 040800926 was issued to formulate corrective actions. One corrective action was to repackage the source into a new leak-tight aluminum overpack container.

At the end of the inspection period, the source remained in storage in the Unit 1 high radiation storage room. The licensee plans to ship the source for permanent disposal to the Department of Energy/Los Alamos National Laboratory in the near future. Following the transfer of the source, the licensee plans to report the material transfer to the NRC in accordance with 10 CFR 74.15 requirements.

6 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the exit meeting on May 5, 2005. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspectors.

ATTACHMENT

PARTIAL LIST OF PERSONS CONTACTED

Licensee

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J. Custer, Unit 1 Operations Superintendent
M. Kirby, Unit 1 Shift Supervisor
M. McBrearty, Engineer, Nuclear Regulatory Affairs
J. Morales, Manager, Unit 1 Decommissioning (acting)
D. Pilmer, Project Manager, Licensing
J. Sills, Project Manager, Unit 1 Health Physics
C. Williams, Manager, Nuclear Regulatory Affairs

INSPECTION PROCEDURES USED

37801 Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors
40801 Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors
62801 Maintenance and Surveillance at Permanently Shutdown Reactors
71801 Decommissioning Performance and Status Review at Permanently Shutdown Reactors
92701 Followup

ITEMS OPENED AND CLOSED

Opened

050-00206/0509-01	NCV	Failure to Conduct Adequate Survey and Post High Radiation Area

Closed

050-00206/0509-01	NCV	Failure to Conduct Adequate Survey and Post High Radiation Area

Discussed

050-00206/0509-02	LER	Leaking Sealed Source

LIST OF ACRONYMS USED

cpm	counts per minute
gpm	gallons per minute
LER	Licensee Event Report
NCV	Non-Cited Violation
PSDAR	Post Shutdown Decommissioning Activities Report
QA	quality assurance
SFP	spent fuel pool