



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

November 7, 2007

EA-07-141

Richard M. Rosenblum
Senior Vice President and
Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2 - NRC
INSPECTION REPORT 05000361/200717 AND INVESTIGATION
REPORT 4-2007-006 AND NOTICE OF VIOLATION

Dear Mr. Rosenblum:

This refers to the subject investigation initiated November 6, 2006. The investigation, by the Nuclear Regulatory Commission's (NRC) Office of Investigation, examined the events documented in your Licensee Event Report 05000-361/2005-004 regarding the loss of main steam isolation signal safety function because an unqualified instrumentation and control technician depressed the wrong reset buttons during a technical specification required surveillance. A violation of Technical Specification 5.5.1.1 was identified and treated as a green noncited violation in NRC Inspection Report 05000361/2005005. Since that initial disposition, the NRC's Office of Investigation conducted the subject investigation to examine whether the actions of the on-the-job trainer supervising the unqualified instrumentation and control technician constituted a willful violation of San Onofre Nuclear Generating Station's training procedure. The results of the investigation and our in-office review were discussed with members of your staff during a telephonic exit meeting on October 29, 2007.

The event involved an on-the-job trainer supervising a trainee during the conduct of Technical Specification Surveillance 5.5.1.1 on the "Plant Protection System Low Steam Generator Pressure" channel "B." At one point, the procedure required the operators to climb 50 feet of stairs to depress the "B" channel "Low SG Pressure Setpoint Reset" button on the "Evacuation Shutdown Panel." The trainee expressed confidence he could do the step without supervision and the on-the-job trainer allowed the trainee to proceed to the "Evacuation Shutdown Panel" by himself to perform the step. However, the trainee incorrectly depressed the reset buttons for channels "D" and "C" before correctly depressing the "B" reset button. As a result, the Main Steam Isolation Signal channels "D" and "C" were reset to values below those allowed by technical specification while channel "B" remained in bypass for the surveillance. This meant three channels of that safety function were inoperable for almost an hour before the technicians identified and corrected the trainee's error. NRC Inspection Report 05000361/2005005 and Licensee Event Report 05000-361/2005-004 discuss the technical details and ramifications of

the error. However, Section 6.3.2 of San Onofre Nuclear Generating Station's General Training Procedure SO123-XV-27, "On-the-Job Training and Task Performance Evaluation Program," states, in part, "OJT Trainers are responsible for controlling the actions and work performed by the trainees during the conduct of training." The on-the-job trainer did not control the actions and work performed by his trainee because the trainer allowed the trainee to perform safety-related maintenance without providing direct supervision.

Based on the results of the subject investigation, the NRC has determined that a violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy included on the NRC's Web site at www.nrc.gov/aboutnrc/regulatory/enforcement/guidance.html. The violation involved a failure to implement the training program in that an on-the-job trainer did not control the actions and work performed by a trainee during the conduct of training as required by 10 CFR 50.120 and San Onofre Nuclear Generating Station's Procedure SO123-XV-27. As a result, the trainee pushed the wrong reset buttons causing a loss of the main steam isolation system safety function for almost 1 hour.

In addition, the NRC concluded that willfulness, in the form of careless disregard, is associated with the violation. The trainer had been trained on the requirement to control the actions of the trainee and should have known that he could not allow the trainee to perform safety-related work without being able to exercise control over the trainee's actions. Given all the circumstances in this case, including the very low safety significance of the underlying violation and the level of the trainer in the organization, this violation of 10 CFR 50.120 has been categorized at Severity Level IV.

The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it have been described in this letter, which serves as the NRC Inspection Report 05000361/2007017. The violation is being cited in the Notice because it involved willfulness and because the NRC could not conclude that the violation appears to be isolated.

San Onofre Nuclear Generating Station's Action Request 051000550 addresses the corrective actions taken regarding this incident. Both the trainer and the trainee were disciplined and retrained. In addition, the surveillance procedure was revised to require two personnel present during the performance of the actions at the "Evacuation Shutdown Panel."

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements. In particular, we request your response address the extent to which trainers may fail to follow the procedural requirements of Section 6.3.2 of San Onofre Nuclear Generating Station's General Training Procedure SO123-XV-27 by allowing trainees to conduct work on safety-related equipment without the direct observation of the trainer, as well as any corrective actions taken to address this issue.

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Dwight Chamberlain, Director
Division of Reactor Safety

Dockets: 50-361; 50-362
Licenses: NPF-10; NPF-15

Enclosure: Notice of Violation

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EA-07-141

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ROPreports
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SUNSI Review Completed: MSH ADAMS: Yes No Initials: MSH
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NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Nuclear Generating Station

Docket No. 50-361
License No. NPF-10
EA-07-141

During an NRC investigation, which was concluded on April 12, 2007, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Part 50.120 of Title 10 of the Code of Federal Regulation states, in part, that each licensee shall establish, implement, and maintain a training program that provides for the training and qualification of instrumentation and control technicians.

Section 6.3.2 of San Onofre Nuclear Generating Station's General Training Procedure SO123-XV-27, "On-the-Job Training and Task Performance Evaluation Program," Revision 8 dated August 12, 2005, states, in part, "OJT Trainers are responsible for controlling the actions and work performed by the trainees during the conduct of training."

Contrary to the above, on October 31, 2005, an on-the-job trainer failed to implement the training program regarding an instrumentation and control technician trainee, in that, the trainer did not control the actions and work performed by the trainee during the conduct of training. Specifically, the on-the-job trainer allowed the trainee to perform work on a safety-related system without being present and was, therefore, unable to control the actions and work of the trainee. As a result, the trainee caused a loss of safety function of the main steam isolation system for almost one hour.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 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 of Violation (Notice), within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation, EA-07-141," and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (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 previously 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.

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

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at www.nrc.gov/reading-rm/adams.html, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public 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 2.390(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 this 7th day of November 2007.