

February 8, 2008

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

**Subject: Docket Nos. 50-361, 50-362, 50-206, and 72-41
Response to a Confirmatory Order; EA 07-232 and EA 07-141
Inspection Report Nos. 05000361/2007016, 05000362/2007016,
05000361/2007017, and 05000362/2007017
San Onofre Nuclear Generation Station**

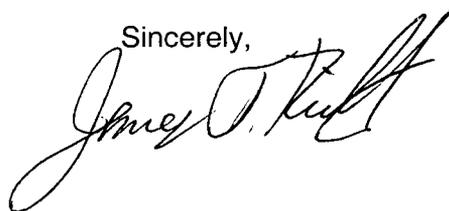
Reference: Letter, Mr. Elmo E. Collins (USNRC) to Mr. Richard M. Rosenblum (SCE), dated
January 11, 2008

Dear Sir or Madam,

The purpose of this letter is to provide Southern California Edison's (SCE's) response to Item 3
of the Confirmatory Order to SCE issued on January 11, 2008, (referenced letter). SCE's
response to Item 3 is enclosed.

If you have any questions, please contact me or Mr. Clay E. Williams at (949) 368-6707.

Sincerely,



Enclosures: As stated

cc: E. E. Collins, Regional Administrator, Region IV
D. D. Chamberlain, Director, Division of Reactor Safety, NRC Region IV
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
K. D. Fuller, Regional Counsel/Allegation Coordination/Enforcement, NRC Region IV

ENCLOSURE 1
Response to EA 07-232 Issues
Docket Nos. 50-361, 50-362, 50-206, and 72-41

REFERENCE

Letter, EA 07-232, Mr. Dwight D. Chamberlain (USNRC) to Mr. Richard M. Rosenblum (SCE), dated September 27, 2007

BACKGROUND

Item 3 of the Confirmatory Order to SCE (EA 07-232) states,

“By 30 days after issuance of the order, SCE will provide to the NRC under separate letter its response to the three issues addressed by the NRC in its letter dated September 27, 2007, (EA 07-232) and for the NRC letter dated November 7, 2007, (EA 07-141), the extent to which trainers may fail to follow the procedural requirements of Section 6.3.2 of SONGS Training Procedure SO123-XV-27.”

SCE RESPONSE TO EA 07-232 ISSUES

The three issues addressed by the NRC in the referenced letter pertain to the firewatch failure to perform rounds and falsification of records. The SCE response to each of the three issues is set forth below:

- 1) “We are interested in your assessment of the causes of this issue, and whether similar conditions exist in other organizations doing work for you.”

SCE Response

At the time the incident was discovered, SCE conducted an investigation and concluded the contract fire protection specialist failed to perform required firewatch inspections and falsified records due to deliberate misconduct on the individual’s part. This situation had existed for approximately five years due to ineffective oversight of the firewatch personnel by SCE supervision.

SCE identified another instance of deliberate misconduct by an employee of the same contractor, but has not identified any other willful violations by other contractor personnel working at SONGS. SCE is expanding the Corporate Ethics Program to include long-term managers and supervisors of independent contract workers at SONGS in 2008. In addition, SCE is taking steps to develop and implement incentives for on-site service contractors to help SCE address the issues that have resulted in deliberate misconduct-related violations (EA 07-232).

- 2) “We are interested in your oversight controls for contractor personnel in general, and specifically for fire protection specialists. In particular, we are interested in organizational issues that permitted this problem to have gone undetected for a prolonged period.”

SCE Response

SCE assigns a company representative (SCE employee) to oversee each contract providing services at SONGS. The company representative is

ENCLOSURE 1
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responsible for verifying the work has been performed in accordance with the contract.

At SONGS, fire protection services are provided by a contract company. In April 2001, SCE modified the arrangements for supervisory oversight of the activities being performed under the fire protection services contract. The unintended consequence of that change was ineffective oversight of the fire protection specialists, which was not recognized until the deliberate misconduct was discovered.

At the time this event was discovered, SCE revised the Fire Protection Services contract to clearly define the roles and responsibilities of the SCE company representative and the onsite contractor coordinator. In addition, SCE added a requirement to the contract to perform periodic verification of firewatch records against security system history reports and to perform unannounced field observations of employees.

In response to the recent instances of willful violations at SONGS, SCE is implementing an extensive program to proactively address this issue (EA 07-232).

- 3) "We would like to know how your programs addressed industry operating experience, including NRC Information Notices, which reported problems with fire watches not being performed, particularly by contract personnel."

SCE Response

SCE reviewed SONGS' responses to industry operating experience associated with similar situations involving deliberate noncompliance and falsification of records. SCE determined that, in the past, processes were put in place at SONGS to minimize the opportunities for acts of deliberate noncompliance to occur. When no incidences were discovered over an extended period of time at SONGS, complacency developed resulting in the failure to prevent the recent instances of deliberate misconduct.

In response to the recent instances of willful violations at SONGS, SCE is implementing an extensive program to proactively address this issue (EA 07-232).

ENCLOSURE 2
Response to EA 07-141 Issue
Docket Nos. 50-361, 50-362, 50-206, and 72-41

REFERENCE:

Letter, EA 07-141, Mr. Dwight D. Chamberlain (USNRC) to Mr. Richard M. Rosenblum (SCE), dated November 7, 2007

BACKGROUND

Item 3 of the Confirmatory Order to SCE (EA 07-232) states,

“By 30 days after issuance of the order, SCE will provide to the NRC under separate letter its response to the three issues addressed by the NRC in its letter dated September 27, 2007, (EA 07-232) and for the NRC letter dated November 7, 2007, (EA 07-141), the extent to which trainers may fail to follow the procedural requirements of Section 6.3.2 of SONGS Training Procedure SO123-XV-27.”

SCE RESPONSE TO EA 07-141 ISSUE

The issue addressed by the NRC in the referenced letter pertains to an on the job (OJT) trainer failing to control the work activities of an unqualified technician when performing work on safety-related equipment. The SCE response to this issue is set forth below:

SCE Response

SCE did not identify any other instances of trainers failing to maintain control of trainees at SONGS during the last three years. Consequently, SCE believes the event addressed in the referenced letter is an isolated occurrence.

Section 6.3 of Procedure SO123-XV-27, “On-The-Job Training and Task Performance Evaluation Program”, specifies that OJT trainers are responsible for “controlling the actions and work performed by the trainees during the conduct of training.” In addition, to obtain qualification as a Task Performance Evaluation Evaluator, a candidate must complete qualification standard TPEPQS for a “Task Performance Evaluation Evaluator.” This standard requires the trainer to closely monitor the trainee’s actions, to ensure the trainee physically locates equipment and controls, and to operate controls if an unplanned event occurs.

Although the OJT program is prescriptive as described above, SCE believes that personnel may not have fully understood the meaning of “controlling the actions and work,” during an OJT session. Consequently, SCE is enhancing the SONGS training lesson for OJT trainers and will provide this training to all OJT trainers and trainees by April 1, 2008. The enhanced training will reinforce the responsibilities of the trainer and trainees during the conduct of OJT sessions.

In response to the recent instances of willful violations at SONGS, SCE is implementing an extensive program to proactively address this issue (EA 07-232).