



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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March 4, 2009

Ross T. Ridenoure,
Senior Vice President and
Chief Nuclear Officer
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San Onofre Nuclear Generating Station
P.O. Box 128
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SUBJECT: ANNUAL ASSESSMENT LETTER - SAN ONOFRE NUCLEAR GENERATING
STATION (NRC INSPECTION REPORTS 05000361/2009001 and
05000362/2009001

Dear Mr. Ridenoure,

On February 11, 2009, the NRC staff completed its performance review of Southern California Edison (SCE) San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. Our technical staff reviewed performance indicators (PIs) for the last two quarters and inspection results over the previous twelve months. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official Use Only - Security-Related Information" will include the security cornerstone review and resultant inspection plan.

Although SONGS Units 2 and 3 operated in a manner that preserved public health and safety and fully met all cornerstone objectives, the NRC is concerned that continuing performance problems are not being effectively addressed. The Midcycle Assessment of SONGS was the second assessment cycle where substantive cross-cutting issues were identified in human performance and problem identification and resolution. We conducted a public meeting following the Midcycle Assessment to discuss your improvement initiatives in both areas. The effectiveness of your initiatives have not been evident and this annual assessment is the third cycle where substantive cross-cutting issues were identified in human performance and problem identification and resolution. As a result, the NRC is requesting you perform specific actions described later in this letter. Additionally, the NRC plans to perform additional inspection activities to assess your effectiveness in addressing these performance deficiencies.

Unit 2 Plant performance for the most recent quarter transitioned from the Licensee Response column to the Regulatory Response column of the NRC's Action Matrix, because of one White finding, in the Mitigating Systems cornerstone. The finding involved the failure to establish appropriate instructions for replacement of a safety-related battery output breaker. Unit 3 Plant performance was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PI's indicating performance at a level requiring no additional NRC oversight (Green).

During this assessment period, the NRC identified 15 Green Findings and one White finding with cross-cutting aspects in the human performance area. In our annual assessment letter dated March 3, 2008, we advised you of a substantive cross-cutting issue in the component of resources involving the theme of failing to provide adequate procedures or work instructions. Our assessment determined that the criteria to close this cross-cutting theme have not been met since your corrective actions have not demonstrated sustained improved performance. In the most recent quarter two findings were identified, one being of low to moderate safety significance (White) as previously discussed. Based on this cross-cutting theme being open for three consecutive assessment cycles the NRC is requesting you perform additional actions as discussed later in this letter.

Additionally, during this assessment period the staff identified an additional theme in the area of human performance involving ineffective use of human error prevention techniques. Five findings were identified during the assessment period affecting the Mitigating Systems and Initiating Events cornerstones. Examples of these human performance findings include instances of operator errors involving reactivity management and instances of failures to follow procedural guidance during surveillance, troubleshooting, and nuclear fuel movement activities.

This human performance substantive cross-cutting issue will remain open until we determine that corrective actions have been effective and have resulted in sustained improved performance.

During this assessment period, the NRC identified eight Green findings with cross-cutting aspects in the problem identification and resolution area. In our annual assessment letter dated March 3, 2008, we advised you of a cross-cutting theme in the component of the corrective action program involving instances of failing to thoroughly evaluate problems such that the resolutions effectively address causes and extent of conditions. During this assessment period seven Green Findings were related to this theme. Your staff has taken corrective actions to address these issues; however, these corrective actions have not resulted in adequate performance improvement. Therefore, this problem identification and resolution substantive cross-cutting issue will remain open until we determine that corrective actions have been effective and have resulted in sustained improved performance. Based on this cross-cutting theme also being open for three consecutive assessment cycles the NRC is requesting you perform additional actions as discussed later in this letter.

On January 11, 2008, the NRC issued SCE Confirmatory Order EA 07-232. The Order was issued in response to the identification of several instances of willful violations. The Order specified specific actions that SCE committed to perform to address potential safety culture issues. On October 3, 2008, the NRC performed a team inspection that reviewed your corrective actions associated with the Order. For a significant number of items the team was unable to determine that your staff had taken sufficient actions, therefore these items still remain open. On January 14, 2009, the NRC received your letter providing a status report regarding your schedule for completion of the open Order items. The NRC plans to perform an additional inspection in June of 2009 to follow up on these Order items.

During this assessment period, known performance problems have persisted and new performance problems have emerged. These are a White finding moving Unit 2 to the Regulatory Response Column of the NRC's Action Matrix; three consecutive

assessment cycles with substantive cross-cutting issues not being effectively addressed in the areas of human performance and problem identification and resolution; and the identification of an additional substantive cross-cutting theme during this assessment period in the human performance area related to effective use of human area prevention techniques. Accordingly the NRC is requesting the following:

- 1) That you provide a written response to this letter describing the status of your corrective actions planned to address the human performance and the problem identification and resolution cross-cutting issues, including schedules, milestones, and performance monitoring metrics.
- 2) That you support a public meeting to discuss your improvement initiatives for the areas discussed in this letter.
- 3) That you perform an independent assessment of the safety culture at SONGS as described in NRC Manual Chapter 0305 "Operating Reactor Assessment Program," on the basis of having two substantive cross-cutting issues open for three consecutive assessment periods.
- 4) That you submit to us written notice stating when you are ready for a 95001 "Inspection for One or Two White Inputs in a Strategic Performance Area" inspection to review your actions involving the White finding associated with the degraded safety related battery breaker.

Additionally, the NRC plans to perform a focused problem identification and resolution team inspection in June of 2009 to assess your improvement initiatives addressing the open substantive cross cutting issues. Also, as previously discussed, the NRC plans to review the remaining open items associated with the Confirmatory Order issued in January of 2008 during this inspection.

This assessment letter advises you of our planned inspection effort resulting from the end-of-cycle review. The enclosed inspection plan details the inspections, less those related to physical protection scheduled through June 30, 2010. The NRC also plans to perform Inspection Procedure 50001, "Steam Generator Replacement Inspection" for SONGS Unit 2. The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 9 months of the inspection plan are tentative and may be revised at the midcycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Michael Hay at (817) 860-8173 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Elmo E. Collins
Regional Administrator

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Licenses: NPF-10; NPF-15

Enclosure:
San Onofre Inspection/Activity Plan

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SUNSI Rev Compl.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reviewer Initials	MCH
Publicly Avail	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Sensitive	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sens. Type Initials	MCH
RIV:C:DRP/D	D:DRS	D:DRP	DRA	RA	
MCHay	RCaniano	DChamberlain	CCasto	ECollins	
/RA/	/RA/	/RA/	/RA/	/RA/	
2/23/2009	2/24/2009	2/24/2009	2/25/2009	2/25/2009	

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San Onofre
Inspection / Activity Plan

03/01/2009 - 06/30/2010

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			X02454 - RETAKE EXAM		2
2	12/01/2008	03/31/2009	X02454	RETAKE EXAM-SONGS UNIT 2(5/26/09)	
			X02454 - RETAKE EXAM		4
2	12/01/2008	03/31/2009	X02454	RETAKE EXAM-SONGS UNIT 2(5/26/09)	
			X02455 - RETAKE EXAM		2
3	12/01/2008	03/31/2009	X02455	RETAKE EXAM- SONGS UNIT 3(5/26/09)	
			X02455 - RETAKE EXAM		2
3	12/01/2008	03/31/2009	X02455	RETAKE EXAM- SONGS UNIT 3(5/26/09)	
			X02455 - RETAKE EXAM		2
3	12/01/2008	03/31/2009	X02455	RETAKE EXAM- SONGS UNIT 3(5/26/09)	
			SGR-U2 - STEAM GENERATOR REPLACEMENT - UNIT 2		1
2	09/27/2009	12/31/2009	IP 50001	Steam Generator Replacement Inspection	
			RE-TAKE - SRO RE-TAKE EXAM		2
2	02/03/2009	03/31/2009	X02454	RETAKE EXAM-SONGS UNIT 2(5/26/09)	
			X02454 - RETAKE EXAM		2
2	02/03/2009	03/31/2009	X02454	RETAKE EXAM-SONGS UNIT 2(5/26/09)	
			X02455 - RETAKE EXAM		2
3	02/03/2009	03/31/2009	X02455	RETAKE EXAM- SONGS UNIT 3(5/26/09)	
			RP-ORS3 - OCCUPATIONAL RADIATION SAFETY - ALARA		1
2,3	04/06/2009	04/10/2009	IP 7112101	Access Control to Radiologically Significant Areas	
2,3	04/06/2009	04/10/2009	IP 7112102	ALARA Planning and Controls	
2	04/06/2009	04/10/2009	IP 71151-OR01	Occupational Exposure Control Effectiveness	
3	04/06/2009	04/10/2009	IP 71151-PR01	RETS/ODCM Radiological Effluent	
			BI - PI&R AND CONFIRMATORY ORDER INSPECTION		2
2,3	06/08/2009	06/12/2009	IP 71152B	Identification and Resolution of Problems	
			EB2-07T - TRIENNIAL HEAT SINK INSPECTION		2
2,3	08/17/2009	08/21/2009	IP 7111107T	Heat Sink Performance	
			EP1 - EP EXERCISE INSPECTION		3
2,3	09/20/2009	09/25/2009	IP 2515/175	Emergency Response Organization, Drill/Exercise Performance Indicator, Program Review	
2,3	09/20/2009	09/25/2009	IP 7111401	Exercise Evaluation	
2,3	09/20/2009	09/25/2009	IP 7111404	Emergency Action Level and Emergency Plan Changes	
2,3	09/20/2009	09/25/2009	IP 71151	Performance Indicator Verification	
			EB1-08P - U2 INSERVICE INSPECTION		1
3	10/19/2009	11/27/2009	IP 2515/172	Reactor Coolant System Dissimilar Metal Butt Welds	
3	10/19/2009	11/27/2009	IP 7111108P	Inservice Inspection Activities - PWR	

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

San Onofre
Inspection / Activity Plan
03/01/2009 - 06/30/2010

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
EXAM - INITIAL EXAM					8
2	10/19/2009	10/30/2009	X02416	INITIAL EXAM UNIT 2-SANO (10/2009)	
3	10/19/2009	10/30/2009	X02417	INITIAL EXAM UNIT 3-SANO (10/2009)	
EB1-17T - 50.59 & MODS					3
2,3	12/07/2009	12/18/2009	IP 7111117T	Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	
RP-ORS5 - OCCUPATIONAL RADIATION SAFETY - ALARA					1
2,3	12/07/2009	12/11/2009	IP 7112101	Access Control to Radiologically Significant Areas	
2,3	12/07/2009	12/11/2009	IP 7112102	ALARA Planning and Controls	
2,3	12/07/2009	12/11/2009	IP 71151	Performance Indicator Verification	
PSB2-52B - BIENNIAL PI&R					4
2,3	02/08/2010	02/12/2010	IP 71152B	Identification and Resolution of Problems	
2,3	02/22/2010	02/26/2010	IP 71152B	Identification and Resolution of Problems	
EB2-05T - TRIENNIAL FIRE PROTECTION					4
2,3	06/14/2010	06/18/2010	IP 7111105T	Fire Protection [Triennial]	
2,3	06/28/2010	07/02/2010	IP 7111105T	Fire Protection [Triennial]	

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.