

June 17, 2011

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

**Subject: Docket Nos. 50-361 and 50-362
Response to Apparent Violation in Inspection Report No. 05000361/2011012
and 50000362/2011012; EA-11-083
San Onofre Nuclear Generation Station, Units 2 and 3**

Reference: Letter from Mr. Anton Vogel (NRC) to Peter Dietrich (SCE) dated May 19, 2011,
NRC INSPECTION REPORT 05000361/2011012; 05000362/2011012

Dear Sir or Madam:

The reference letter transmitted the results of NRC Inspection Report No. 5000361/2011012 and 5000362/2011012 to Southern California Edison (SCE). The inspection was conducted in-office from March 2, 2011, to April 18, 2011, for the San Onofre Nuclear Generating Station. The referenced letter also contained an Apparent Notice of Violation (EA-11-083) and requested SONGS to either (1) respond to the apparent violation addressed in this inspection report within 30 days of the date of the letter, or (2) request a Predecisional Enforcement Conference (PEC). SONGS is choosing to provide a response to the Apparent Violation, which is provided in the Enclosure to this letter. No new commitments were made in the NOV response.

If you have any questions, please feel free to contact me or Mr. R. J. St. Onge at (949) 368-6240.

Sincerely,



Enclosure: As stated

cc: E. E. Collins, Regional Administrator, NRC Region IV
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3
R. Hall, NRC Project Manager, San Onofre Units 2 and 3

P.O. Box 128
San Clemente, CA 92672
(949) 368-9275 PAX 89275
Fax: (949) 368-9881
Doug.Bauder@sce.com

ENCLOSURE 1

RESPONSE TO APPARENT NOTICE OF VIOLATION

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The Enclosure to the NRC letter dated May 19, 2011, states in part:

"10 CFR 55.53(f) which states, in part, that the facility licensee is required to certify that the qualifications and status of a Senior Reactor Operator (SRO) are current and valid prior to the operator resuming activities authorized by their license. Specifically, on October 21, 2010, and October 27, 2010, an SRO performed licensed activities (core alterations) as Refueling SRO Supervisor while his license was INACTIVE. Additionally, the SRO was on a temporary medical hold from licensed activities on the dates identified. On October 27, 2010, the SRO's license restrictions were questioned by on-shift operations personnel and the SRO was relieved from his watch station. The licensee has entered this AV into their corrective action program as NN 201174957. Corrective actions are still being evaluated.

Failure of the facility licensee to maintain electronic programs used to verify licensed operator qualifications and to schedule licensed operator watch stations up-to-date with licensed operator worker qualifications and license restrictions could potentially impede the regulatory process by not providing complete and accurate information to NRC inspectors. NRC Enforcement Policy, Section 6.4, Licensed Reactor Operators, Item c.1.(c) states, in part, that if a licensed operator, or a senior operator actively performing the functions covered by that position, is determined to be in noncompliance with a condition stated on the individual's license, then an apparent Severity Level III violation exists."

SCE RESPONSE TO APPARENT NOTICE OF VIOLATION

EVENT SUMMARY

On October 21-22, 2010, and October 27, 2010, during the Unit 3 Cycle 16 refueling outage, an SRO performed licensed activities (core alterations) as Refueling Senior Reactor Operator (RSRO) Supervisor while his license was INACTIVE. On October 27, 2010, the SRO's license restrictions were questioned by on-shift operations personnel and the SRO was relieved from his watch station.

1. Reason for the Violation

The SONGS Site Worker Scheduling (SWS) program for the RSRO position did not contain adequate criteria required to validate qualifications for the RSRO position which allowed the Operations Scheduling group to schedule the RSRO without an active license. The SWS includes data tables which identify requirements for licensed watches, and when the scheduler attempts to enter the name of an individual whose required qualifications are not valid, the system provides a warning. However, the data table was not populated with specific position requirements for the Refueling SRO position at the time the individual was scheduled for the Unit 3 outage Refueling watches. The Operations scheduling group did not validate the RSROs qualifications prior to scheduling the operator for the RSRO position as required by the procedure for Operations Division Personnel Responsibilities.

The SRO with an inactive license assumed RSRO duties without ensuring he met the requirements for the post, having an active license, which is required by the Operations

Division Personnel Responsibilities procedure. At the time of the event, the individual was assigned to a position (Work Process Supervisor) which required SRO level knowledge and experience but did not require an active SRO licensee. The individual incorrectly assumed the RSRO position was similar and did not require an active license.

2. Corrective Actions Taken and Results Achieved

Upon discovery of the noncompliance, October 27, 2010, the RSRO was relieved from his watch station and his Independent Worker qualifications were suspended by the Control Room Supervisor pending remedial action.

Operations issued a Priority 1 Required Reading for all Licensed operators to ensure they were aware of the requirement to hold an active SRO license to stand the RSRO watch. Coaching was provided to the RSRO who stood watch without an active license and to the scheduler who failed to check the qualifications of the individual prior to scheduling the RSRO position.

A review was performed of the Site Worker Scheduling (SWS) staffing sheets and station logs for the RSRO watches for the previous Unit 2 refueling outage and for the watches performed previously during Unit 3 Cycle 16 core offload. It was confirmed that all individuals who performed the role of RSRO for these watches held an active license. Also, an audit of the medical files for individuals performing the RSRO function for the previous Unit 2 outage and for the Unit 3 Cycle 16 core offload was completed by licensed SCE health care providers. No other individuals were found to be medically disqualified from standing RSRO watches.

The SONGS SWS program has been updated to specify the criteria for fulfilling the RSRO position and provides a warning if an individual does not have the required qualifications, including medical restrictions.

No further examples of unqualified individuals performing Licensed duties have been identified.

3. Corrective Actions That Will Be Taken

The SONGS refueling SRO lesson plan will be updated to include appropriate information regarding the requirements of medical restrictions. Additionally, the site standard for verifying worker qualifications is the electronic Qualifications Information System (eQIS). SONGS is updating the eQIS program to include operator qualifications. These actions will be completed before the next refueling outage.

4. Date When Full Compliance Will Be Achieved

Full compliance was achieved on 10/27/2010, when the individual performing the role of Refueling SRO, with an inactive SRO license, was relieved on station by an individual with an active SRO license.