



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

August 4, 2011

EA-11-083

Mr. Peter Dietrich
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 - NOTICE OF VIOLATION,
NRC INSPECTION REPORT 05000361/2011012 AND 05000362/2011012

Dear Mr. Dietrich:

This letter refers to the in-office inspection conducted from March 2 through April 18, 2011, for Southern California Edison Company's San Onofre Nuclear Generating Station. The purpose of the inspection was to determine whether any violations of regulatory requirements occurred when an inactive and medically disqualified senior operator performed licensed duties (core alterations) as refueling senior operator supervisor on October 21 and October 27, 2010. A telephonic inspection exit meeting was conducted with members of your staff on April 18, 2011. An inspection report identifying an apparent violation was issued on May 19, 2011 (ML111400480).

In the letter transmitting the inspection report, we provided you with the opportunity to address the apparent violation identified in the report by either attending a predecisional enforcement conference or by providing a written response before we made our final enforcement decision. In a letter dated June 17, 2011, you provided a written response to the apparent violation.

Based on the information developed during the inspection and the information that you provided in your response to the inspection report dated May 19, 2011, the NRC has determined that a violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation and the circumstances surrounding it are described in detail in the subject inspection report. The violation involved a failure to comply with 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 operator are current and valid prior to the operator resuming activities authorized by their license. Specifically, a medically disqualified and inactive senior operator performed licensed activities (core alterations) as refueling senior operator supervisor on October 21, 2010, and again on October 27, 2010, and did not have the required certification by the facility licensee.

The licensee standard for verifying worker qualifications was the electronic Qualifications Information System. Licensed operator qualifications were not included in the electronic Qualifications Information System. The program used by the licensee's scheduling group when generating watch schedules was site worker scheduling. Site worker scheduling did not contain criteria required to validate qualifications for the refueling senior operator supervisor position. Although there were no safety consequences, the failure to keep licensed operator worker qualifications and license restrictions current in the electronic Qualifications Information System and site worker scheduling resulted in the licensee scheduling an inactive and medically disqualified senior operator to perform licensed activities. Therefore, this violation has been categorized, in accordance with the NRC Enforcement Policy, at Severity Level III.

Because your facility has not been the subject of escalated enforcement actions within the last 2 years, the NRC considered whether credit was warranted for *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. Based on the NRC's review of information provided in your "Apparent Cause Evaluation," which was summarized, in part, in your response to the May 19, 2011, inspection report, the NRC has determined that credit is warranted for the *Corrective Action* factor. Completed corrective actions include relieving the refueling senior operator supervisor upon discovery of the noncompliance; issuing a Priority 1 required reading for all licensed operators; confirming that refueling senior operator watchstanders for the previous Unit 2 refueling outage and Unit 3 core offload held active licenses; and updating the site worker scheduling program to provide a warning if an individual does not have the required qualifications, including medical restrictions. Pending corrective actions identified include updating the refueling senior operator lesson plan to include appropriate information regarding the requirements of medical restrictions and updating the electronic Qualifications Information System program to include operator qualifications. The licensee stated that the pending corrective actions will be completed before the next refueling outage.

Therefore, to encourage prompt and comprehensive correction of violations, and in recognition of the absence of previous escalated enforcement action, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be achieved is already adequately addressed on the docket in NRC Inspection Reports 05000361/2011012 and 05000362/2011012, and your letter dated June 17, 2011. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice of Violation.

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 you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the

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NRC web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response, if you choose to provide one, should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Please contact Mr. Mark Haire, Chief, Operations Branch, at 817-860-8159 if you have any questions about this letter or its enclosure.

Sincerely,

/RA A.T.Howell for/

Elmo E. Collins
Regional Administrator

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

Enclosure: Notice of Violation

cc w/enclosure:
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NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Nuclear Generating Station

Dockets: 50-361; 50-362
Licenses: NPF-10; NPF-15
EA-11-083

During an NRC inspection conducted from March 2 through April 18, 2011, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 55.53(e) states, in part, that if a (senior operator) licensee has not been actively performing the functions of a senior operator, the (senior operator) licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section.

10 CFR 55.53(f) states, in part, that before resumption of functions authorized by a license issued under this part, an authorized representative of the facility licensee shall certify the following: (1) That the qualifications and status of the (senior operator) licensee are current and valid; and (2) That the (senior operator) licensee has completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned.

Contrary to the above, on October 21 and October 27, 2010, the facility licensee did not certify that the qualifications and status of the senior operator licensee were current and valid and that the senior operator licensee had completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator, as appropriate and in the position to which the individual will be assigned. Specifically, the facility licensee did not certify that qualifications of the senior operator licensee were current and valid and scheduled the senior operator to perform licensed activities (core alterations) as refueling senior operator supervisor while his license was INACTIVE. Additionally, on the dates identified, the senior operator was not medically qualified in accordance with ANSI 3.4 (1996), "Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Nuclear Power Plants," to perform licensed duties.

This is a Severity Level III violation (Section 6.4).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved is already adequately addressed on the docket in NRC Inspection Reports 05000361/2011012 and 05000362/2011012, and the letter from the licensee dated June 17, 2011. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, EA-11-083," and send it 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, within 30 days of the date of the letter transmitting this Notice of Violation.

If you choose to respond, 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 <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Dated this 4th day of August 2011