



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

December 16, 2010

(b)(7)(C)

SUBJECT: CONCERNS YOU RAISED TO THE U.S. NUCLEAR REGULATORY
COMMISSION (NRC) REGARDING THE SAN ONOFRE NUCLEAR
GENERATING STATION.

RE: ALLEGATION RIV-2010-A-0190

7.C
Dear

(b)(7)(C)

005
This letter refers to your meeting with Messrs. Nick Hernandez and Sam Graves on
November 16, 2010, during which you expressed concerns related to (b)(7)(C) for
cleaning and inspecting busses and breakers, battery breaker bolt torque specifications, and
Outside of Scope at the San Onofre Nuclear Generating Station.

Enclosure 1 to this letter documents your concerns as we understand them. We have initiated
actions to evaluate your concerns and will inform you of our findings. The NRC normally
conducts an evaluation of a technical concern within 6 months, although complex issues may
take longer. While evaluating your concerns, the NRC determined that Concern 2 did not
involve an NRC regulatory requirement. Therefore, we do not plan any action to be taken on
that concern. The complete technical response is included in Enclosure 1. If the description of
any of your concerns as noted in Enclosure 1 is not accurate, please contact me so that we can
assure that your concerns are appropriately described and adequately addressed prior to the
completion of our review. Please understand that your technical concerns will be evaluated
separately, and you will receive a separate response to each technical concerns.

In your conversation with Mr. Hernandez on November 16, 2010, you indicated that you would
not object to the NRC requesting information from the licensee with regard to your concerns. As
part of our response to your concerns, we intend to request Southern California Edison
Company to perform an evaluation and provide a written response to the NRC. Your name and
any other identifying information will be excluded from the information that is provided to the
Southern California Edison Company in the request for information. We will request that
Southern California Edison Company evaluation be thorough, objective, and that the evaluator
be independent of Southern California Edison Company's management responsible for

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

E/12

oversight of the functional area related to your concerns. We will evaluate Southern California Edison Company's response, and consider it in developing our conclusions regarding your concerns. We will inform you of our disposition once we have evaluated Southern California Edison Company's response and taken any additional actions, if necessary, to address your concerns.

If a request is filed under the Freedom of Information Act related to your areas of concern, the information provided will, to the extent consistent with that act, be purged of names and other potential identifiers. Further, you should be aware you are not considered a confidential source unless confidentiality has been formally granted in writing.

Enclosure 2 with this letter is a brochure entitled "Reporting Safety Concerns to the NRC," which contains information that you may find helpful in understanding our process for review of safety concerns. The brochure contains an important discussion of the identity protection provided by the NRC regarding these matters, as well as those circumstances that limit the NRC's ability to protect a concerned individual's identity. Please read that section of the brochure.

However, you should be aware that your identity could be disclosed regarding this matter if the NRC determines that disclosure is necessary to ensure public health and safety and security for the common defense; to respond to an order of a court or NRC adjudicatory authority or to inform Congress or State or Federal agencies in furtherance of NRC responsibilities under law or public trust; to support a hearing on an NRC enforcement matter, per requirements of the Freedom of Information Act; or if you have taken actions that are inconsistent with and override the purpose of protecting a concerned individual's identity.

Thank you for notifying us of your concerns. We will advise you when we have completed our review. If you should have any additional questions, or if the NRC can be of further assistance, please call Mr. Nick Taylor, Senior Allegation Coordinator, toll-free at the NRC Safety Hotline at 1-800-695-7403 or 1-800-952-9677 extension 520. You may also provide information to Mr. Taylor in writing at the address listed in the header, or by electronic mail, if you so choose. However, when doing so, please call Mr. Taylor in advance or provide your phone number in your e-mail message so that we can confirm that you are the source of the information. Also, please be advised that the NRC cannot protect the information during transmission on the Internet and there is a possibility that someone could read your response while it is in transit. Mr. Taylor's address is R4Allegation@nrc.gov.

Sincerely,



Anton Vogel, Director
Division of Reactor Safety

7.6

(b)(7)(C)

3

RIV-2010-A-0190

Enclosures:

1. Statement of Concerns
2. Reporting Safety Concerns
to the NRC
3. NRC's Early ADR Program
4. OSHA Fact Sheet: Your Rights as a
Whistleblower

STATEMENT OF CONCERNS
ALLEGATION RIV-2010-A-0190

Concern 1:

Sometime after 2008, the work packages for 125Vdc bus/breaker cleaning and inspections were modified. The line side of the battery breakers was no longer de-energized. As a result, this preventive maintenance item no longer verified that the battery breaker line side bolts are properly torqued.

Concern 2:

Nuclear Notification (b)(7)(C) identified suspect connections on battery breakers 2D203 and 2D206. Three bolts exhibited slight motion when checked at full torque value. These instances were not tracked in the Electrical Component Health Report, as specified in Nuclear Notification (b)(7)(C)

NRC Response to Concern 2:

Our review indicated that the Electrical Component Health Reports for 1Q10 and 2Q10 do indeed list 12 suspect connections. The inspectors validated that neither the 1Q10 nor the 2Q10 report lists the 2D203 or 2D206 battery breaker connections as examples. Additionally, the inspectors were able to confirm that the 2D203 and 2D206 connections were corrected on the spot, so there is no current safety concern. The inspectors determined that while true, this concern addressed an administrative issue, as the Electrical Component Health Report is not required to demonstrate compliance with any NRC regulatory requirement. Therefore, this issue will be brought to attention of the licensee for their information, and the NRC is taking no further action for this concern.

This concern does not involve NRC regulatory requirements. It is being closed as a non-allegation.

Concern 3:

Work Order NRME 800369795 contains a technically incorrect step to perform thermography on dc vital bus panel 2D2, because that panel will be de-energized.

Concern 4:

There is no specific step to check the torque for battery breaker bolts in Work Order NRME 800369795 (clean and inspect dc switchboard 3D3).

Outside of Scope