

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-361/79-21
Docket No. 50-361 License No. CPPR-97 Safeguards Group _____
Licensee: Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770
Facility Name: San Onofre Unit 2
Inspection at: San Diego County, California
Inspection conducted: August 21-23, 1979
Inspectors: *A. D. Johnson* 10/1/79
A. D. Johnson, Reactor Inspector Date Signed
G. B. Zwetzig Oct. 1, 1979
G. B. Zwetzig, Reactor Inspector Date Signed

Date Signed
Approved By: *B. H. Faulkenberry* 10/2/79
B. H. Faulkenberry, Chief, Reactor Project Section 2, Date Signed
Reactor Operations and Nuclear Support Branch

Summary:

Inspection on August 21-23, 1979 (Report No. 50-361/79-21)
Areas Inspected: Routine, unannounced inspection of the licensee's preoperational test procedures and independent inspection effort. The inspection involved 40 inspector hours onsite by two NRC inspectors.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

- *D. Nunn, Quality Assurance Manager
- *P. Portanova, Startup Test Operations Supervisor
- *G. Morgan, Operations Superintendent, Units 2 and 3
- *P. Croy, Site Project QA Supervisor
- *P. Belhumeur, Startup QA Supervisor
- *D. Rosenblum, Test Operations Supervisor - NSSS
- *P. King, Lead QA Engineer
- D. Verbeck, Test Operations Supervisor - B of P
- T. Phelps, Startup Engineer
- B. Woods, Shift Test Engineer
- B. Schwab, Startup Supervisor, Unit 2
- R. Phelps, Nuclear Engineer

*Denotes those attending the exit interview.

2. Preoperational Test Procedures

The inspectors examined the status of the procedures to be used to perform scheduled preoperational tests. Licensee representatives explained that most of the procedures were in various stages of development. Draft procedures for the following systems were examined:

- a. Pressurizer-pressure and level control system, AC-211-03 (Revision A)
- b. Auxiliary feedwater system, 2PE-235-01 (Revision A)
- c. 125 volt DC batteries, charges and distribution fuses (class IE) 2PE-448-01 (Revision C)

Item c. above was in final draft status and ready for submission to the test working group for final approval. No comments were made by the inspectors.

Item b. above had been reviewed by the licensee. The licensee's comments on the draft were found to be the same as those independently made by the inspectors. Normally, two to three drafts of a procedure are required before being considered to be in proper form for submission to the TWG for review and approval, according to licensee representatives.

Item a. above was found to lack provisions for manually testing the heater breakers and verifying that the low-low level set point would de-energize all pressurizer heaters. The licensee representatives stated that the breakers had been tested during a prerequisite test and that the low-low level set point automatic actions would be tested during hot functional testing. The licensee representative further stated that the system was non-safety related as indicated in Table 3.2-1 of the Final Safety Analysis Report for both San Onofre Units 2 and 3. As such, according to the licensee representatives, the testing of the system is neither subject to nor controlled under the startup quality assurance program required by 10 CFR Part 50, Appendix B. The representatives explained that the test of the system is not subject to review by the TWG nor subject to QA inspection or audits. The representatives further stated that the startup engineer responsible for the system assures that the system is adequately tested and will function as designed.

The inspector commented that in his opinion Criterion 13, 10 CFR Part 50, Appendix A applies to the pressurizer pressure and level control systems and therefore the systems are related to the safety of plant operations. The inspector stated that since the systems are related to the safety of plant operations, 10 CFR Part 50, Appendix B requirements are applicable and should be applied. The licensee representatives indicated that the company's position was that only those functions of the pressurizer connected to the reactor protection system were safety related and subject to the quality assurance requirements of 10 CFR Part 50, Appendix B. The inspector stated that the differences in interpretation of the regulations would be forwarded to NRC Headquarters for evaluation. The licensee representatives stated that an evaluation of the company's position would be made.

3. Exit Interview

At the conclusion of the inspection, the inspectors met with the licensee representatives identified in Paragraph 1 above. After discussion of the applicability of the startup QA program to systems designated non-safety related, the licensee representative stated that the position of the company would be evaluated and that the classifications of the various systems would be examined.