

SCE
Southern California Edison Company

RECEIVED
NRC
REGION V

93 AUG 30 A11:25

RICHARD M. ROSENBLUM
VICE PRESIDENT

23 PARKER STREET
IRVINE, CALIFORNIA 92718

August 23, 1993

TELEPHONE
714-458-4550

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-206, 50-361, and 50-362
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Units 1, 2, & 3

Reference: Letter from Mr. C. A. VanDenburgh (USNRC) to Mr.
Harold B. Ray (SCE), dated July 21, 1993

The referenced letter forwarded a Notice of Violation resulting from the NRC inspection conducted from May 13 through June 23, 1993, at the San Onofre Nuclear Generating Station, Units 1, 2, and 3. This inspection was documented in NRC Inspection Report Nos. 50-206, 361, 362/93-11, dated July 21, 1993.

In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the Notice of Violation. As discussed with Mr. VanDenburgh on June 27, 1993, due to the delay in receipt of the referenced letter from the NRC, the due date for the response was extended until August 26, 1993.

If you have any questions regarding SCE's response to the Notice of Violation or require additional information, please call me.

Sincerely,

Richard M. Rosenblum

Enclosure

9308270093

FCF

Document Control Desk

-2-

cc: B. H. Faulkenberry, Regional Administrator, NRC Region V
S. W. Brown, NRC Project Manager, San Onofre Unit 1
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre
Units 1, 2, and 3
R. F. Dudley, Section Chief, Non-Power, Decommissioning, and
Environmental Project,
Directorate of Reactor Projects - 3, 4, and 5

bcc: Edwin A. Guiles (SDG&E)
R. G. Lacy (SDG&E)
A. R. Watts (Rourke & Woodruff)
E. K. Aghjayan (City of Anaheim)
B. D. Carnahan (City of Riverside)
Harold B. Ray
R. M. Rosenblum
R. W. Krieger
B. Katz
W. C. Marsh
C. Chiu
D. Herbst
J. T. Reilly
K. E. O'Connor
L. O. Cash
R. A. Joyce
D. P. Breig
J. L. Reeder
R. W. Waldo
J. J. Wambold
G. T. Gibson
CDM Files
ONL Files
NL Files

REPLY TO A NOTICE OF VIOLATION

The Enclosure to Mr. VanDenburgh's letter dated July 21, 1993 states, in part:

"A. 10 CFR Part 50, Appendix B, Criterion V, specifies that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

"a. Procedure SO123-XVIII-23, TCN 0-1, 'Implementation Of Site Housekeeping and Cleanliness Controls,' Paragraph 6.4.1.5, specified that, 'Excess materials or equipment (such as hoses, portable gear, tools, ladders, temporary power cables) not in use shall be removed or properly secured, in order to prevent it from becoming a hazard to safety-related equipment or personnel during a seismic event.' In addition, procedure SO123-I-1.20, Revision 2, 'Seismic Controls During Maintenance, Testing, and Inspection,' Paragraph 6.1.1, required that 'Precautions shall be taken to ensure that no tool, material, or any other item capable of damaging a safety-related piece of equipment be allowed to impact any safety-related equipment.' It also indicated in Paragraph 6.5.1 that, 'All storage containers, gang boxes, welding machines and/or power panels shall be anchored or secured as far away from safety-related as practical when in safety-related areas except when being moved.' In addition, in Paragraph 6.2.3 it required that 'step ladders, when left unattended, shall be laid down on the floor and secured to a permanent civil structure, or if left standing, tied off in 2 places at or near the top to a permanent civil structure.'

ENCLOSURE

"Contrary to the above, the following examples were observed in which components were not properly restrained near safety-related equipment:

- "On May 17, 1993, a tool cart was left unsecured and unattended near an Emergency Safety Features cabinet behind the Unit 3 control room panels.
 - "On May 27, 1993, a ladder was propped up against a pipe while unsecured and unattended within a few feet of component cooling water pump P-025 transfer switch S21804ED005 in Unit 2 Room 23.
 - "On May 27, 1993, a gang box was left unsecured and unattended within 10 feet of a component cooling water piping and transmitters in Unit 2 Room 23.
 - "On June 5, 1993, a ladder was standing unsecured and unattended next to Unit 2 auxiliary feedwater pump P141.
 - "On June 9, 1993, an unsecured and unattended ladder was stored in a scaffolding storage area in Unit 2 component cooling water pump Room 12.
 - "On June 16, 1993, a ladder was standing unsecured and unattended near reactor coolant loop 1A hot leg injection drain valve 2HV9437 on the 17 foot elevation of the Unit 2 containment.
 - "On June 16, 1993 an equipment box was secured to a safety-related electrical conduit, CABJ13, on the 45 foot elevation of Unit 2 containment (near column 5)
 - "On June 24, 1993, a ladder was standing unsecured and unattended behind 480V safety-related switchgear in the Unit 1 4160 VAC switchgear room.
- "b. Procedure S0123-XXVI-14.120, Revision 1, 'Construction/Testing Aids,' Paragraph 6.2.1.2, required that 'A new Scaffolding Safety Evaluation shall be generated for revisions to existing scaffolding unless the modifications are minor in nature and do not extend the scaffolding over any additional plant equipment.'

ENCLOSURE

"Contrary to the above, as of May 27, 1993, work was being performed under design change package (DCP) 2-6863, 'Containment Spray Cross-Tie,' when an interference was encountered with installed scaffolding. As a result, Bechtel craft modified the scaffolding by replacing the interfering vertical member with two additional members. The new members were supported from safety-related containment spray pipe supports S2-SI-004-H-0017 and 0019. However, no engineering evaluation of the modification was performed to determine if the load addition was within acceptable limits.

"These examples are considered a Severity Level IV violation (Supplement I)."

REPLY TO THE VIOLATION

1. REASON FOR THE VIOLATION

Securing Temporary Use Items

During the period of May and June 1993, SCE staged materials and performed pre-outage work in support of the Unit 2 Cycle 7 outage. During this period, the items cited above were noted in various locations: five unsecured ladders; one unsecured scaffold; and three unsecured tool/gang boxes. However, in none of the identified instances did the unsecured item(s) constitute a significant threat to safety-related equipment in the vicinity.

Our review indicates the majority of the cited items involved contract workers failing to implement housekeeping and seismic restraint procedures. Further analysis determined some instances where other work groups failed to restrain temporary equipments (e.g., ladders, tool carts, gas bottles) in accordance with site procedures. Review of the procedures determined they were difficult to implement and in some cases overly restrictive. In addition, the training provided required some enhancement.

Scaffold

An interference with a properly built and approved scaffold was identified, in that one vertical member from the scaffold was found directly in line with welding work on new piping. When such an interference is encountered, it is permissible per procedure, to modify the scaffold configuration by securing the scaffolding to a structural support, provided a prior engineering evaluation is performed to confirm the acceptability of the new configuration. Craft personnel modified the scaffold by

ENCLOSURE

removing the interfering vertical member and replacing it with two additional members. The new members were supported from horizontal braces of pipe supports S2-SI-004-H-0017 and 0019.

However, no engineering evaluation was performed at the time to determine if the load to the horizontal braces was acceptable. SCE has subsequently performed an engineering evaluation of the scaffold configuration which concluded the condition was acceptable. Accordingly, the incident did not constitute a threat to safety-related equipment in the vicinity.

Summary

The reasons for the violation were that the applicable procedures were difficult to implement and in some cases were overly restrictive. Contributing to the conditions was insufficient training on procedural requirements.

2. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The following actions were taken to correct the identified conditions:

- a. The specific housekeeping and scaffold deficiencies were immediately corrected.
- b. SCE performed a walk down of applicable scaffolds in safety related areas to verify compliance with procedures. The scaffolds were found in compliance.
- c. Special briefings were held with contract personnel addressing housekeeping, seismic restraining requirements, and adherence to applicable procedures.
- d. Special briefings were held with SCE Maintenance and Nuclear Construction personnel to address housekeeping and seismic restraint requirements.
- e. SCE has increased Nuclear Oversight Division (NOD) and management oversight in outage activities, including area walkthroughs with emphasis on housekeeping and seismic restraint.

ENCLOSURE

3. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The corrective steps cited above and the lessons learned from this event will be incorporated, as appropriate, into preoutage briefings for applicable contract and SCE personnel prior to the start of the Unit 3 Cycle 7 refueling outage.

The housekeeping and scaffolding procedures will be reviewed and appropriately modified in the areas of human factors and technical adequacy. The procedure review and incorporation of any appropriate revisions will be completed by October 9, 1993.

The Nuclear Oversight Division (NOD) will monitor Housekeeping and Seismic Restraint during Unit 3 Cycle 7 outage surveillance and audit activities.

The overall housekeeping and scaffolding training program will be enhanced by January 1994, to improve initial training, routine periodic retraining, and to specifically identify target audiences.

4. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved by June 30, 1993 when the identified deficient conditions were corrected.