



**Southern California Edison Company**

23 PARKER STREET  
IRVINE, CALIFORNIA 92718

RICHARD M. ROSENBLUM  
VICE PRESIDENT

September 30, 1993

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NRC  
REGION V

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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. VanDemburgh (USNRC) to Mr.  
Harold B. Ray (SCE), dated August 26, 1993.

The referenced letter forwarded a Notice of Violation resulting from the NRC inspection conducted June 24 through July 28, 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, 362/93-19, dated August 26, 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. VanDemburgh on August 30, 1993, due to the delay in receipt of the referenced letter from the NRC, the due date for the response was extended until September 30, 1993.

With regard to the above referenced letter, the NRC requested that SCE also address the actions taken to ensure that commitments made in future LERs will be fully implemented. We have noted that NRC inspectors reviewed and closed (as NRC Unresolved Item No 50-361/93-05-06) this issue based on their review of SCE Division Investigation Report NRA-93-001 dated May 20, 1993.

Specifically these actions include the identification of explicit commitments and the responsible party for implementing the commitments during the LER review/approval cycle. This is accomplished by annotating review copies to specifically identify organizations responsible for the accuracy of document information and completing applicable commitments. The administrative controls associated with LERs and our Regulatory Commitment Tracking System (RCTS) were discussed on September 22, 1993, with the resident inspector and Division Section Chief.

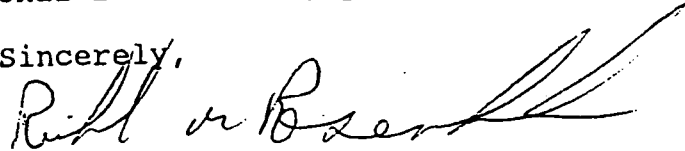
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Document Control Desk

-2-

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

Sincerely,



Enclosure

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  
NRC Resident Inspector Office, San Onofre Units 1, 2, & 3  
R. F. Dudley, Section Chief, Non-Power, Decommissioning, and  
Environmental Project,  
Directorate of Reactor Projects - 3, 4, and



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE  
WALNUT CREEK, CALIFORNIA 94596-5368

OCT 26 1993

Docket Nos. 50-206  
50-361  
50-362

Southern California Edison Company  
Irvine Operations Center  
23 Parker Street  
Irvine, California 92718

Attention: Mr. Harold B. Ray  
Senior Vice President

Gentlemen:

Thank you for your letter of September 30, 1993, in response to our Notice of Violation and Inspection Report No. 50-206/93-19, 50-361/93-19, and 50-362/93-19, dated August 26, 1993, informing us of the steps you have taken to correct the items which we brought to your attention. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

C. A. VanDenburgh, Chief  
Reactor Projects Branch

cc:

Mr. Robert G. Lacy, Manager, Nuclear Department, San Diego Gas & Electric Company  
Mayor, City of San Clemente  
Chairman, Board of Supervisors, County of San Diego  
Mr. Steve Hsu, Radiologic Health Branch, State Department of Health Services  
Mr. Don J. Womeldorf, Chief, Environmental Management Branch, California Department of Health Services  
Mr. Thomas E. Bostrom, Project Manager, Bechtel Power Corporation  
Mr. Edwin A. Guiles, Vice President Engineering & Operations, San Diego Gas and Electric Co.  
T. E. Oubre, Esq., Southern California Edison Company  
Chairman, Board of Supervisors, County of San Diego  
Mr. Sherwin Harris, Resource Project Manager, Public Utilities Department  
Mr. Charles B. Brinkman, Manager, ABB Combustion Engineering Nuclear Power  
Mr. R. W. Krieger, Vice President, Southern California Edison Company

ENCLOSURE

REPLY TO A NOTICE OF VIOLATION

The enclosure to Mr. VanDenburgh's letter dated August 26, 1993, states in part:

"During an NRC inspection conducted on June 24 through July 28, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

"10 CFR Part 50, Appendix B, Criterion XVI, requires that for significant conditions adverse to quality, measures shall assure that the cause of the condition is determined and that corrective actions are taken to preclude repetition.

"Contrary to the above, corrective actions for inoperable main steam safety valves (MSSVs), a significant condition adverse to quality, in Unit 3 on July 15, 1990, were not adequate to prevent MSSV 2PSV8411 from being inoperable for a four day period ending February 8, 1993. Procedural changes made in 1990 were not effective in preventing the uncontrolled removal of lagging from MSSV 2PSV8411 in February 1993 and resulted in the MSSV being inoperable.

"This is a Severity Level IV violation (Supplement I)."

1. **REASON FOR THE VIOLATION**

Background

In July 1990, during start up of Unit 3 from a refueling outage, one MSSV opened below the minimum required Technical Specification setpoint. The MSSV had been refurbished and calibrated by a vendor during the refueling outage. SCE found the MSSV, which had prematurely opened, had been calibrated without lagging installed. SCE's normal practice is to install lagging and operate the MSSVs with the valve bodies lagged in order to reduce thermal losses through the valve body. SCE determined from the vendor that other MSSV valves in service had been calibrated without lagging and promptly removed the lagging from those affected in-service valves.

As a consequence of the TS violation, Licensee Event Report (LER) 50-361/90-008 was prepared and reviewed by SCE to address the event (mis-calibration of an MSSV at the Crosby calibration facility), the cause of the mis-calibration and

#### ENCLOSURE

to provide corrective actions to assure that each MSSV would be calibrated with lagging installed on the valve body at Crosby.

Immediately before the LER was submitted to the NRC, SCE management elected to improve (although not related to the LER) SCE's controls of MSSV lagging at SONGS. Although this action was not required to be addressed in the LER, a corrective action was added to the "Planned Corrective Actions" section of the LER addressing the control of lagging on MSSV valves bodies and was entered into SCE's Regulatory Commitment Tracking System (RCTS).

#### Reasons for the Violation

The added corrective action addressing control of MSSV lagging in LER 50-361/90-008, stipulated, "... The general Maintenance Order (MO) which is used to remove lagging from valves and piping at Units 2 and 3 will be revised to require an engineering review prior to removal of any lagging installed on the MSSVs ... ." This corrective action was developed and inserted into the LER without consultation with or approval of the management of the cognizant organization. The failure by supervisory personnel to obtain the required approval was contrary to the SCE procedure controls for the preparation, review, approval and submission of LERs. The supervisor involved is no longer employed by SCE but this is considered to be an isolated, individual error.

Because the added corrective action was neither reviewed nor approved by the cognizant organization, it was not recognized that the specified corrective action was inadequate to assure the required valve configuration would be maintained under all reasonable circumstances.

The review and closure of the RCTS item was delegated to a supervisor who did not understand the requirements for completion of all actions prior to closure. The supervisor apparently intended to issue the change to the general maintenance order (MO) and then follow-up with a longer term corrective actions. As a consequence, changes to the MO for MSSV lagging removal were implemented without establishing another RCTS action to track the long term actions.

ENCLOSURE

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

As discussed in the letter from W. C. Marsh to S. Richards (NRC-RV) dated November 23, 1992, corrective actions were implemented in late 1992 to enhance the review and approval process of NRC correspondence. The enhancements provide added assurance that proposed corrective action(s) are reviewed and approved by appropriate management.

Additionally, on October 19, 1992, measures were implemented to limit RCTS closure authority to the manager level, or their written designee, who is: 1) cognizant of the scope and intent of regulatory commitments and, 2) authorized to close RCTS in the capacity of the organization manager.

SCE personnel involved in the preparation of NRC correspondence, which includes corrective actions and other commitments, have received training on the importance of assuring that commitments clearly describe the underlying purpose of the commitment. The training, independently conducted in June 1993, also emphasized the importance of assuring that differences between any commitment and its implementation are identified and resolved by appropriate management.

Corrective actions have been implemented to ensure lagging is not removed when the valve is required to be operable.

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

A selective audit of 1990-1993 LER RCTS items will be performed by February 15, 1994, to provide reasonable assurance that no other similar instances have occurred.

4. **DATE WHEN FULL COMPLIANCE WAS ACHIEVED**

Full compliance was achieved on February 8, 1993, when the lagging on MSSV-8411 was re-installed, the valve body temperature stabilized, and the valve declared operable.

*Southern California Edison Company*

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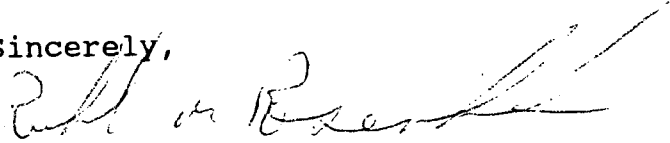
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Sincerely,

A handwritten signature in dark ink, appearing to read "R. F. Dudley", is written over the word "Sincerely,".

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