Southern California Edison Company

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December 1, 1993

Mr. B. H. Faulkenberry, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Subject: Southern California Edison Control of Contractors
San Onofre Nuclear Generating Station, Units 1, 2 and 3

Reference: Letter, C. A. VanDenburgh (NRC) to Mr. Harold B. Ray (SCE), Subject: NRC Inspection Report 50-206, 361, 362/93-19, dated August 26, 1993

The referenced letter transmitted the results of a routine inspection conducted by Mr. C. W. Caldwell, et al., for inspection activities during the period June 24 through July 28, 1993. This letter is in response to an NRC observation which states in part:

> "...We note another deficiency involving the control of contractors occurred during this inspection report period. Your QA organization noted a deficiency in the control of weld filler material by a contractor employee. We note that QA has identified similar instances of this by contractor employees. In addition, our previous inspection reports (50-206/93-09 and 93-11) highlighted further deficiencies in the control of contractor activities related to the identification of degraded radiological control barriers, proper placement of self-reading dosimeters, inadvertent damage to equipment, and failures to properly restrain portable equipment. These instances of failures to control contractor activities appear to warrant additional management attention to ensure that effective corrective actions are implemented."

Southern California Edison (SCE) management continues to be actively involved in the assessment, implementation, and monitoring of the effectiveness of actions taken to address the above described deficiencies.

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Your staff and Edison's Quality Assurance (QA) organization had identified several programs which were performing at less than Edison's expected standard. A number of corrective actions (enhanced training, improved procedures), were completed promptly and the performance of personnel improved steadily for the remainder of the outage as indicated by our continuing QA observations.

Following the refueling, QA performed an evaluation of deficiencies noted during the outage. Several programs were identified as candidates for assessment. As a result, Quality Action Teams (QATs) were established to perform multi-disciplined, in-depth evaluations of these programs. The teams concentrated their efforts in the following four main areas:

(a) Housekeeping/seismic control
(b) Weld filler material control
(c) Consumable chemical control
(d) Flame permit/fire extinguisher control

As a result of these evaluations, corrective actions that will improve program performance were identified.

For short term corrective actions, Edison has conducted approximately 4800 hours of training of contractor personnel to improve outage performance. Edison will monitor performance during the Unit 3 outage to assure these training actions have been effective.

Edison's review of the issue of the failure to properly restrain portable equipment determined that this issue was not unique to contract personnel. As stated in our August 23, 1993 Reply to a Notice of Violation, and discussed during the July 29, 1993 Edison - NRC Management Meeting, Edison believes this issue involved Edison employees generally outside the core maintenance group (operators, I & C Techs, etc) as well as contractor workers. As a long term corrective action, Edison is expanding our training program for seismic restraint of portable equipment to include a broader range of workers who perform work in the vicinity of SR equipment. Edison has completed enhancements to the Seismic Control and Housekeeping procedures, and is monitoring implementation of these during the refueling outage. Additionally, Edison will continue training in these areas to ensure compliance with

expectations for personnel (Edison and Contractor) performance. Edison expects personnel performance to continually improve as the improved training and enhanced controls are implemented.

If you have any further questions, please call me.

Sincerely,

cc: 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 and 3
R. F. Dudley, Section Chief, Non-Power, Decommissioning, and Environmental Project, Directorate of Reactor Projects - 3, 4 and 5