

*Southern California Edison Company*

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RICHARD M. ROSENBLUM  
VICE PRESIDENT

December 15, 1993

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

Dear Mr. Faulkenberry:

Subject: Docket Nos. 50-361 and 50-362  
Edison's Nuclear Safety Concerns Program Enhancements  
San Onofre Nuclear Generating Station, Units 2  
and 3

Reference: NRC Inspection Report Nos. 50-206, 361, 362/93-29,  
Dated November 4, 1993

The referenced report requested that Edison evaluate findings from NRC interviews about the Nuclear Safety Concerns (NSC) Program as it was perceived by two groups of workers, and provide any actions planned to address these findings. Specifically, the referenced inspection report stated that: (1) some contractor employees were not aware of the NSC Program, and some were worried about possible discrimination if they went to the NSC Program; and (2) that some maintenance personnel interviewed lacked confidence in going first to their supervisor with a concern, and a subset also lacked confidence in the NSC Program.

Edison's NSC Program and associated policies, as set forth in Directive D-008, have proven to be an effective means to ensure that free flow of safety information occurs; and also to protect those individuals who raise concerns from discrimination. However, Edison had previously recognized that a disproportionate share of the concerns submitted came from contractor workers. Edison also observed that concerns raised by contractor workers were a significant industry issue. To address this issue Edison has:

- o Completed a revision to our directive on the NSC program, D-008. The directive now specifically addresses contractor issues. It also clearly explains our prohibition on discrimination against those who raise safety issues, the consequences to those who may

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discriminate (including contract termination), and the protection provided those who raise safety issues.

- Held a special meeting with principals of the major contractor organizations. In this meeting our policies, as stated in D-008 were explained including the serious consequences (which include contract termination) of not following them. Information on our policies was also provided to other contractor organizations who did not attend the special meeting.
- Changed our normal means of reminding all workers of our policies and about the NSC Program (an annual letter to all workers) to specifically include contractor workers. Although this is believed to have occurred in the past, the change will provide additional assurance that contractor workers are covered.
- Sent a letter to all suppliers of supplemental personnel and services restating Edison's policies, the need to comply, and the consequences of failure to do so. This letter will be transmitted annually to all contractors.
- Added new contract language specifically addressing employee concerns issues to our electronic contract clause library. Buyers are instructed to include this clause in applicable service contracts.

Edison will also change the standard terms and conditions used for contractors to specifically address employee concerns issues. This change will be included in the next revision to the contract standard terms and conditions. No date has been established for this action, but the change to purchase orders noted above has an equivalent effect in the interim.

Prior to the referenced NRC inspection, Edison was in the process of developing a survey of the entire worker population to assess the understanding of issues similar to those raised during the NRC inspector's interviews. This process will be completed by January 31, 1994. Based on the survey findings, the need for additional enhancements to our program may be identified and implemented as appropriate. Edison expects this effort will address the second group of employees discussed in the NRC Inspection Report cover letter.

Additionally, we have completed a revision to the NSC Program Procedure to incorporate recent industry experience, our recent experience, and other program upgrades. This revision addresses, among other things, the issues noted in Section 8 of the body of

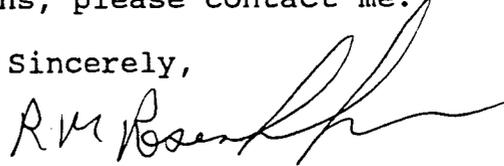
Mr. B. H. Faulkenberry

3

the referenced NRC Inspection Report. Implementation of these program upgrades is in progress and will be complete by March 31, 1994.

Should you have any questions, please contact me.

Sincerely,



cc: NRC Document Control Desk  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3  
Howard J. Wong, Region V  
NRC Resident Inspector Office, San Onofre Units 1, 2 and 3