



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE  
WALNUT CREEK, CALIFORNIA 94596-5368

February 15, 1994

Southern California Edison Company  
23 Parker Street  
Irvine, California 92718

Attention: Mr. Harold B. Ray  
Senior Vice President, Power Systems

Gentlemen:

Subject: QUALITY ASSURANCE PROGRAM DESCRIPTION FOR  
SAN ONOFRE UNITS 1, 2 AND 3

We have reviewed Change Notice (CN) 40 to the Topical Report SCE-1-A, "Quality Assurance Program," Amendment 16 which you submitted to us on December 17, 1993. Your review of this change notice determined that it did not represent a decrease in commitment to the currently approved version of Quality Assurance Program (QAP) Amendment 16. However, our review noted the following conditions that represent an apparent reduction in your commitments. These changes, without further clarification, appear to reduce your previous commitments.

- 1) CN 40 to Section 17.2.18.2 deleted the requirement for placing acceptable suppliers on the Approved Suppliers List (ASL).
- 2) CN 40 to Section 17.2.19.3 deleted the specific attributes to be reviewed for fire protection design documents.
- 3) We also noted in our review of CN 40 of your QAP that the corporate official responsible for the establishment and implementation of the SCE Quality Assurance Program has been reduced from the Senior Vice President, Nuclear, to the Vice President, Engineering and Technical Services. Furthermore the independence of the Vice President, Engineering and Technical Services, and consequently the independence of the Quality Assurance organization, was not readily apparent. For example, for QA issues dealing with engineering, who would the Vice President, Engineering and Technical Services, represent, QA or Engineering? We recognize that Section 17.2.2.2 allows the Manager of Nuclear Oversight to refer any disputes, if necessary, to the Senior Vice President, Power Systems, or to the Chairman of the Board, for resolution. However, this arrangement would appear to cause a tenuous reporting relationship between the Manager of Nuclear Oversight and the Vice President, Engineering and Technical Services.

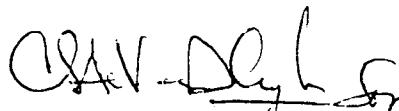
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We request that you clarify or revise your QAP to address the questions and concerns that we have identified in this letter. These questions and concerns have been previously discussed with Mr. John Harmon of your staff. Should you have any questions regarding our review, please contact Mr. W. J. Wagner at (510) 975-0313.

Sincerely,



S. A. Richards, Acting Director  
Division of Reactor Safety and Projects

cc:

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