

ENCLOSURE 1

NOTICE OF VIOLATION

Southern California Edison Co.
San Onofre Nuclear Generating Station

Dockets: 50-361
50-362
Licenses: NPF-10
NPF-15

During an NRC inspection conducted on March 12 through April 22, 1995, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances"

Contrary to the above, as of April 22, 1995, licensee procedures in two cases were inappropriate for the circumstances as follows:

(1) Procedure S023-3-2.7, Attachment 14, Temporary Change Notice 8-41, "Venting ECCS Suction Piping After Maintenance," an activity affecting quality, was inadequate in that it did not include all vent valves necessary to vent low pressure safety injection pumps which resulted in air binding of a pump on March 9, 1995.

(2) Procedure S023-3-2.1, Attachment 18, Temporary Change Notice 12-35, "2MF-020 CVCS Purification Filter Replacement," an activity affecting quality, was inadequate in that it did not provide a pressurized source of water to verify that there was no system leakage after installing a new filter and caused reactor coolant system water to be drained on March 21, 1995.

This is a Severity Level IV violation (Supplement 1) (361/9504-02).

- B. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," states, in part, that "Measures shall be established to assure that conditions adverse to quality . . . are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition"

Contrary to the above, as of April 22, 1995, the licensee failed to take corrective actions to preclude continued failures of Agastat relays in safety-related components.

- During the Unit 2 and 3 Cycle 6 refueling outage integrated engineered safeguards features surveillance testing, Agastat Series 7000 electrical relays used in safety-related applications

evidenced a 27 percent failure rate (as-found) of the Technical Specification acceptance criterion for time setting.

- During the Unit 2 and 3 Cycle 7 refueling outage testing, these same relay locations had a 39 percent failure rate.
- Sixty-six percent of the Agastat relay positions that did not meet the Technical Specification acceptance criterion during Cycle 6 also did not meet the criterion during Cycle 7.
- There are similar failure rates for these relays for the approximate 12 years both units have been operational.

This is a Severity Level IV violation (Supplement I) (361, 362/9504-04).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Co. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 7th day of June 1995