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Southern California Edison Company

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HAROLD B. RAY
VICE PRESIDENT

TELEPHONE
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October 6, 1989

Mr. Ross A. Scarano, Director
Division of Radiation Safety & Safeguards
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: Docket Nos. 50-206, 50-361 and 50-362
Quality Assurance "Hotline"
San Onofre Nuclear Generating Station

Dear Mr. Scarano:

Thank you for your letter dated September 22, 1989 concerning the subject matter. Your letter indicated that you have received an allegation to the effect that personnel at San Onofre are reluctant to contact the Quality Assurance Hotline, out of concern that their names will be disclosed to their supervision. I certainly agree with you that the effect of this concern may be to prevent identification of problems at an early stage and that it should therefore receive my immediate attention.

It is Edison's policy that the names of personnel documenting Nuclear Safety Concerns (NSCs) to the Quality Assurance Organization (QAO) will not be disclosed. The applicable QA procedure, N16.07, includes the following note in this regard:

"All NSCs shall be held in strict confidence by the QAO. The name of the originator shall not be divulged unless authorized by that individual... All NSCs will be processed as received, except when editing is desirable to enhance the originator's confidentiality."

This same policy applies to concerns communicated over a telephone hotline. I believe this policy has been consistently followed.

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However, QA procedures also provide for a determination to be made concerning whether the QAO will make an "independent assessment" of the NSC. This determination is intended to allow the QAO to focus its resources on NSCs which indicate potential nuclear safety issues requiring independent assessment by the QAO itself, and to involve the cognizant functional division in the assessment of other concerns which have been submitted through the NSC program, but which do not involve such issues. (Even though an NSC may not be designated for independent assessment by the QAO, and the cognizant functional division may then be requested to provide input to the QAO, the identity of the individual is maintained confidential, in accordance with the above policy.)

Notwithstanding Edison's confidentiality policy with respect to the identity of the originator, the fact is disclosed that a particular QA concern has been received, at least to the cognizant functional division manager, even when it may be designated by the QAO for independent assessment. It is sometimes then possible for management and supervision to surmise the identity of the originator, based on prior discussions or events related to the concern. I believe this process of speculation is the actual basis for the allegation described in your letter.

Accordingly, we will make two changes to our procedures for handling NSCs as follows:

1. Where NSCs are designated for independent assessment by the QAO, the existence of the NSC itself, as well as the identity of the originator, will be maintained as confidential as possible.
2. The decision concerning which NSCs will be independently investigated by the QAO, and which will be referred to the cognizant functional organization for response to the QAO, will be made by me, based on a recommendation from the Manager of Nuclear Oversight.

I believe these two changes will increase the likelihood that the identity of personnel who raise nuclear safety issues will be maintained confidential, when that is their desire. Edison has a long-standing policy of encouraging all personnel to identify any concerns without the need for confidentiality or anonymity, but we also want to ensure that confidentiality or anonymity can be provided, to the maximum extent possible, when desired.

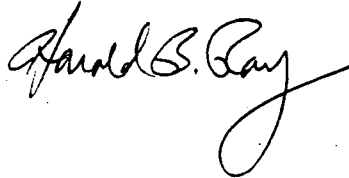
Mr. Ross A. Scarano

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If you have any questions or comments concerning the above,
or if you wish additional information, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Harold B. Ray". The signature is written in dark ink and is positioned below the word "Sincerely,".

HBR:RAS:105

cc: David J. Fogarty
C. Caldwell, NRC Senior Resident Inspector, San Onofre 1,2&3