

*Southern California Edison Company*

SAN ONOFRE NUCLEAR GENERATING STATION

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July 12, 1989

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Subject: Docket Nos. 50-206, 50-361 and 50-362  
Revised Licensee Event Reports (LERs)  
San Onofre Nuclear Generating Station  
Units 1, 2 and 3

Reference: Letter, Mr. R. P. Zimmerman (NRC) to Mr. Kenneth P. Baskin (SCE),  
dated June 2, 1989

The Reference requested that Southern California Edison (SCE) submit revisions to three Licensee Event Reports (LER) discussed in NRC Inspection Report Nos. 50-206/89-06, 50-361/89-06 and 50-362/89-06. As discussed in the reference, it appeared to the Region V staff that these LERs did not fully address the applicable root causes and corrective actions for the related events. This submittal provides revisions to these LERs which includes the requested additional information. As discussed on June 19, 1989, with Mr. C. Caldwell of the Region V staff, due to the delayed receipt of the referenced letter, the due date for this response was extended until July 12, 1989.

In addition, the reference requested that SCE identify actions to be taken to ensure that future LERs address all appropriate aspects of the events reported. SCE recognizes the importance of performing thorough investigations of all reportable events and furthermore recognizes that the LER submittal must accurately and completely include all required information. SCE believes that its programs for performing root cause investigations and for the preparation of the required reports are structured toward meeting these goals. It has been the experience of SCE that for the past several years, the expectation of both the NRC and the industry regarding the thoroughness of root cause evaluations and associated reports has risen well beyond the requirements of the reporting regulations. SCE agrees that improvements in this area must continue and that associated programs must be periodically evaluated and enhanced.

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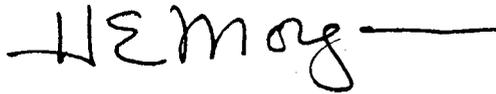
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In addition to this ongoing activity, certain actions are being taken in response to the NRC observations stated in the reference. The LER procedure used by Compliance personnel for preparing and processing LERs has been enhanced by adding: 1) precautions to ensure a discussion of all appropriate aspects surrounding the event, including root causes and corrective actions, per 10 CFR 50.73(b), are included in the LER; and 2) an independent review by an investigator not involved in the given event for the purpose of ensuring the above requirement is met. Additionally, this procedure revision and the aspects of the three LERs discussed in the referenced inspection report were reviewed with Compliance personnel responsible for preparation of LERs.

If you require any additional information, please so advise.

Sincerely,



Enclosures: LER No. 88-018, Rev. 1, Docket No. 50-206  
LER No. 88-031, Rev. 1, Docket No. 50-361  
LER No. 89-001, Rev. 1, Docket No. 50-362

cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 and 3)  
J. B. Martin (Regional Administrator, USNRC Region V)  
Institute of Nuclear Power Operations (INPO)