

NOTICE OF VIOLATION  
AND  
PROPOSED IMPOSITION OF CIVIL PENALTY

Southern California Edison Company  
San Onofre Unit 1

Docket No. 50-206  
License No. DPR-13  
EA 88-99

During an NRC inspection conducted between February 22 and March 30, 1988, violations of NRC requirements were identified. In accordance with the "Modified Enforcement Policy Relating to 10 CFR 50.49, Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants," contained in Generic Letter 88-07, the Nuclear Regulatory Commission proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282 and 10 CFR 2.205. The particular violations and associated proposed civil penalty are listed below:

10 CFR 50.49(a) requires each holder of a license for operation of a nuclear power plant to establish a program for qualifying electric equipment identified in 10 CFR 50.49(b).

10 CFR 50.49(b) defines equipment important to safety and covered by 10 CFR 50.49 to include:

- (1) Safety-related electric equipment (i.e., that equipment relied upon to remain functional during and following design basis events), and
- (2) Non-safety-related electric equipment whose failure could affect the satisfactory fulfillment of safety functions.

10 CFR 50.49(d) requires the licensee to prepare a list of equipment covered under 10 CFR 50.49(a).

10 CFR 50.49(f) requires that each item of electric equipment be qualified by test and/or analysis to show that the equipment to be qualified is acceptable.

10 CFR 50.49(j) requires that a record of the qualification of electric equipment be maintained in a qualification file in an auditable form to permit verification that the equipment is qualified and that the equipment meets the specified performance requirements under postulated environmental conditions.

Contrary to the above, between November 30, 1985 and the date of this inspection:

- A. The following electric components, required to be qualified pursuant to 10 CFR 50.49(b)(1), were not included in the licensee's master list of EQ equipment, and were not qualified by test and/or analysis:

Notice of Violation

- 2 -

1. Four safety injection miniflow valves (SV 17, SV 17A, SV 875A, and SV 875B).
  2. Four safety injection miniflow valve position switches (ZSO 1875A, ZSO 1875B, ZSC 1875A, ZSC 1875B).
  3. One auxiliary feedwater pump bearing cooling water valve (SV 135).
  4. Seven charging system flow control valves (SV 1112, SV 1115DA, SV 1115DB, SV 1115EA, SV 1115EB, SV 1115FA, and SV 1115FB).
  5. Two charging system auxiliary spray valve converters (HY 1304 and HY 1305).
  6. Four charging system auxiliary spray valve position switches (ZSO 1304, ZSO 1305, ZSC 1304, and ZSC 1305).
  7. Three feedwater system block valves (MOV 20, MOV 21 and MOV 22).
  8. Three feedwater system bypass valve solenoids (SV 149, SV 150 and SV 151).
  9. Three feedwater system regulating valve solenoids (SV 456, SV 457 and SV 458).
  10. Two auxiliary feedwater pump discharge valves (MOV 1202 and MOV 1204).
- B. The following electric components, required to be qualified pursuant to 10 CFR 50.49(b)(2), were not included in the licensee's master list of EQ equipment, and were not qualified by test and/or analysis:
1. Twelve safety injection switchover valve air solenoids (SV 520, SV 521, SV 522, SV 523, SV 524, SV 525, SV 526, SV 527, SV 528, SV 529, SV 530, and SV 531).
  2. Two charging system recirculation pump bearing water valves (SV 2077 and SV 3078).
  3. Three charging system flow controllers (FY 1115A, FY 1115B and FY 1115C).
- C. The following components were not qualified due to discrepancies between the tested/analyzed and installed configuration:
- Main feedwater pump motor air filters.

D. The following electric components, required to be qualified pursuant to 10 CFR 50.49(b)(1), were not included in the licensee's master list of EQ equipment:

1. Two safety injection switchover valve bonnet vents (SV 2900 and SV 3900).
2. Two safety injection miniflow valves (SV 18 and SV 18A).
3. Four charging system flow controllers (FY 1112, FY 1115D, FY 1115E, and FY 1115F).
4. Three charging system recirculation flow indicators (FT 2114B, FT 2114C, and FT 3114A).

These violations constitute an EQ Category B problem.

Civil Penalty - \$150,000 (These EQ violations existed in excess of 100 days of plant operation).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company (Licensee) is hereby required to submit a written statement or explanation to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of this date of this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) admission or denial of the violation, (2) the reason for the violation, if admitted, (3) the corrective steps that have been taken and the results achieved, (4) the corrective steps that will be taken to avoid further violations, and (5) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, U.S.C. 2232, this response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, the licensee may pay the civil penalty by letter to the Director, Office of Enforcement, U. S. Nuclear Regulatory Commission, with a check, draft, or money order payable to the Treasury of the United States in the amount of the civil penalty proposed above, or the cumulative amount of the civil penalties if more than one civil penalty is proposed, or may protest imposition of the civil penalty in whole or in part by a written answer addressed to the Director, Office of Enforcement, U. S. Nuclear Regulatory Commission. Should the licensee fail to answer within the time specified, an order imposing the civil penalty will be issued. Should the licensee elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation" and may: (1) deny the violations listed in

Notice of Violation

- 4 -

this Notice in whole or in part, (2) demonstrate extenuating circumstances, (3) show error in this Notice or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the mitigation factors in Generic Letter 88-07, "Modified Enforcement Policy Relating to 10 CFR 50.49, Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants," should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of the Licensee is directed to the other provisions of 10 CFR 2.205, regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty due, which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The response to the Director, Office of Enforcement, noted above (Reply to a Notice of Violation, letter with payment of civil penalty, and Answer to a Notice of Violation) should be addressed to: Director, Office of Enforcement, U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector, San Onofre Nuclear Generating Station.

FOR THE NUCLEAR REGULATORY COMMISSION

  
For John B. Martin  
Regional Administrator

Dated at Walnut Creek, California  
this 10 day of June 1988