

Southern California Edison Company

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KENNETH P. BASKIN
VICE PRESIDENT

April 20, 1989

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

Gentlemen:

Subject: Docket Nos. 50-206
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Unit 1

Reference: Letter, Mr. R. P. Zimmerman (NRC) to Mr. Kenneth P. Baskin (SCE),
dated March 23, 1989

The Reference forwarded NRC Inspection Report No. 50-206/89-01 and a Notice of Violation resulting from the routine inspection conducted by Messrs. F. R. Huey, J. E. Tatum and A. L. Hon during the period of January 8 through February 18, 1989. In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the subject Notice of Violation.

If you require any additional information, please so advise.

Very truly yours,

Kenneth P. Baskin

Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

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ENCLOSURE

REPLY TO A NOTICE OF VIOLATION

Appendix A to Mr. R. P. Zimmerman's letter, dated March 23, 1989, states in part:

"Technical Specification 6.8.1 requires that applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established and implemented.

"Section 9.a of Appendix A to Regulatory Guide 1.33, Revision 2, states that maintenance that can affect the performance of safety related equipment should be performed in accordance with written procedures.

"Maintenance procedure S0123-I-1.18, Revision 2 (Control of Foreign Material) provides specific requirements for control of foreign material during maintenance activities on safety related equipment which could result in loss of material inside of the equipment. In particular, paragraph 4.1.4 requires that the foreign material exclusion (FME) monitor establish temporary boundaries and postings around openings in safety related equipment. Furthermore, paragraph 4.1.6 requires that the FME monitor inspect personnel and material entering and exiting the FME area in order to ensure that proper controls, as specified in the procedure, are maintained.

"Contrary to the above, on January 31, 1989, during maintenance on safety related diesel generator #1, for which FME controls had been implemented, required FME boundaries and postings were not established. Furthermore, personnel were observed to enter and exit the FME control area without being inspected by the FME monitor as required.

"This is a Severity Level IV violation (Supplement I)."

RESPONSE

1. Reasons for the violation, if admitted.

SCE admits that on January 31, 1989, a small section of the FME warning tape boundary along the north wall of diesel generator #1 became dislodged, thereby permitting an NRC inspector to gain access into the FME zone. Further, SCE admits that once the NRC inspector's presence inside the FME zone was realized, FME personnel did not challenge the NRC inspector.

The FME program is designed to assist plant personnel in preventing the inadvertent introduction of material into safety related components or systems. The FME program is not intended to provide a physical barrier to entry. Rather, it assists workers to recognize when and where FME requirements are in effect.

SCE has reviewed the facts and circumstances surrounding the events of January 31. SCE's review has concluded that the FME controls for the January 31 work on diesel generator #1 were in accordance with procedure S0123-I-1.18 and consisted of:

- establishing an FME boundary using FME warning tape;

- placement of FME placarding in the FME zone;

- establishing an FME entry point;

- instituting FME controls on equipment inside the FME zone; and

- assigning dedicated FME monitor(s) to control the FME zone, log all personnel and tools brought into the FME zone, and perform a shiftly surveillance of the work area to ensure the integrity of all FME controls.

However, sometime during the shift before the inspector's visit on January 31, in the northwest corner of the FME zone, the FME boundary warning tape became dislodged (cause unknown). The FME tape had been tied to a pipe affixed to the north wall of the diesel building and the FME boundary had been surveilled on a shiftly basis. Less than one hour prior to the inspector's visit, senior management had conducted an inspection of the work in this area and had observed that the FME warning tape was secured to the north wall piping.

The dislodged FME warning tape fell but caught on an adjacent vertical air hose. This created a gap between the tape and the north wall piping.

The inspector entered the diesel building through the north area. Access to the generator (the FME zone) from this side had not been intended, and there was no entry point established in this area. Access to the generator area (the FME zone) was through the FME entry point at the diesel generator building missile door on the opposite side from the north wall.

The inspector proceeded to the work location by way of the north wall. The inspector entered the FME zone undetected. Just prior to the NRC inspector's arrival, the assigned Lead FME Monitor had to briefly leave the area, and therefore turned temporary control of the FME zone over to another FME Monitor. Upon her return, the Lead FME Monitor noted the NRC inspector's presence. The Lead FME Monitor asked the FME Monitor what the NRC inspector was doing in the FME zone.

The FME Monitor did not have sufficient training and/or experience to know that he should challenge anyone who had not properly entered the FME zone. The FME Monitor admitted (to the Lead FME Monitor) that he had not challenged the NRC inspector because he had assumed that the NRC had the authority to dispense with FME controls to conduct an inspection. However, procedure SO123-I-1.18 does not provide such an exemption.

The Lead FME Monitor then approached the NRC inspector and observed that the inspector was only performing a visual inspection, was maintaining a safe (FME) distance from diesel openings, and posed no immediate threat to the FME controls. The NRC inspector promptly began conversing with the Lead FME Monitor about the FME controls. The Lead FME Monitor acknowledged the NRC inspector's statement that the FME Monitor failed to challenge the inspector's violation of FME zone entry procedures. Shortly thereafter, the inspector left the FME zone.

SCE conducted an investigation concerning an assertion that other persons were improperly in the FME zone and were not following FME controls. A review of the FME logs, Security logs, and interviews with all individuals present in the diesel building (including a worker outside of the FME zone performing unrelated work), did not reveal any personnel, with the exception of the NRC inspector in the FME zone, who were not properly logged in.

In summary, SCE has concluded that the FME control procedure was not adequately implemented because: (1) there was a gap in the FME warning tape (cause unknown); and (2) an FME monitor thought that there could be exceptions to FME controls not expressly delineated in the FME procedure.

2. Corrective steps that have been taken and the results achieved.

On January 31, 1989, the FME warning tape was re-attached to the north wall.

3. Corrective steps that will be taken to avoid further violations.

The FME monitor training will be enhanced to reaffirm requirements for challenging personnel to explicitly state that non-site personnel (i.e., NRC, INPO, etc.) are not exempted from FME controls.

4. Date when full compliance will be achieved.

Full compliance was achieved on January 31, 1989, when the FME barrier was re-established.