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L. T. PAPAY
VICE PRESIDENT

TELEPHONE
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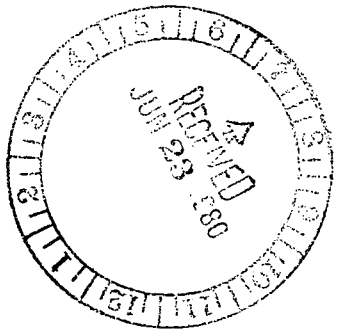
June 16, 1980



Mr. R. H. Engelken, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94596

Dear Mr. Engelken:

DOCKET NO. 50-206
SAN ONOFRE UNIT 1

In a letter from your office dated May 28, 1980, we were requested to respond to a Notice of Violation resulting from an inspection of San Onofre Unit 1 activities which took place during the period April 5 - May 2, 1980. The enclosure to this letter provides our response to the notice.

I trust the enclosure responds adequately to all aspects of the Notice of Violation. If you have any questions, of if we can provide additional information, please let me know.

Very truly yours,

cc: L. F. Miller (NRC - San Onofre Unit 1)

SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 1

RESPONSE TO NOTICE OF VIOLATION
DATED MAY 28, 1980

Response to the Notice of Violation is provided below. A statement of the condition described is given for reference.

NOTICE OF VIOLATION

"Based on the results of an NRC inspection on April 5 - May 2, 1980, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC Facility License No. DPR-13 as indicated below.

A. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Appendix "A" of USNRC Regulatory Guide 1.33 Rev. 1. Paragraph 9.c.(7) of Regulatory Guide 1.33 recommends written procedures for the replacement of neutron detectors. The Facility Test Procedure No. S-II.1.11, Rev. 2, for replacing neutron detectors was written pursuant to these requirements.

Contrary to the above requirements:

1. On April 16, 1980, Facility Test Procedure No. S-II.1.11 was not implemented in the replacement of the source range instrumentation detectors.

2. On April 24, 1980, the detectors for the source range instrumentation became erratic and were replaced pursuant to the required procedure with the exception that high voltage plateau curves were not prepared and used as required by Step R of the procedure.

This is an infraction."

RESPONSE

1. CORRECTIVE ACTION WHICH HAS BEEN TAKEN AND THE RESULTS ACHIEVED

1) The technicians involved failed to perform the task by procedure. This matter has been discussed in detail with the foreman and all instrument and test technicians and they have been cautioned that the use of procedures is mandatory. This discussion is documented in each technician's training file.

2) High voltage data was taken and a plateau determined as required by step R of Station Procedure S-V-1.11, Rev. 2. This data was used to adjust the high voltage on the three source range channels. The appropriate curves were later drawn from the data and attached to the procedure for record purposes as required by step R.

2. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER VIOLATIONS

1) The corrective action taken above is sufficient to avoid further violation.

2) No action required.

3. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

1) All subject station personnel were instructed in the proper use of procedure by June 9, 1980.

2) Not applicable.

B. "Technical Specification 6.10.1.b requires that records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety be retained for a period of at least five years.

Contrary to the above requirement, the records required by Test Procedure S-II.1.11 cited in Item A, above, relating to replacement of detectors for the power range instrumentation, channel number 1205, on February 4, 1980, were unavailable on April 2 and apparently not retained as required.

This is a deficiency."

RESPONSE

1. CORRECTIVE ACTION WHICH HAS BEEN TAKEN AND THE RESULTS ACHIEVED

The technicians replacing the subject detectors failed to use the required procedure. Thus, the records required as a part of Procedure S-II-1.11 were not generated. This deficiency was discussed with the foreman and all instrument and test technicians involved in conjunction with the action taken in item A. This discussion is documented in each technician's training file. The detector for power range channel 1205 was replaced on June 13, 1980, prior to return to power. The required records are available on file for the in-service detector.

2. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER VIOLATIONS

The corrective action taken above is sufficient to avoid further violations.

3. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All subject station personnel were instructed in the proper use of procedures and deposition of records by June 9, 1980.

C. "Title 10, Code of Federal Regulations Part 20.203.b, requires that each radiation area (defined in 10 CFR 20.202) shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION: RADIATION AREA.

Contrary to the above, on April 17, 1980, radiation dose readings of 8 millirem per hour were measured outside a posted temporary rope barrier surrounding a spent resin cask located on a truck. The 8 millirem per hour radiation area was not conspicuously posted as required by 10CFR part 20.203.B.

This is an infraction."

RESPONSE

1. STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The required signs had been conspicuously posted in accordance with 10CFR 20.203.b requirements; however, during a period of intense work activity construction crews inadvertently removed the signs. Upon notification of the deficient condition, signs were immediately reposted in conspicuous locations. Contractor supervisors were reminded of the importance to observe and comply with all radiation postings and barriers.

2. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER VIOLATIONS

Contractor personnel who were on site at the time were instructed in basic radiation protection which emphasized the importance of complying with all radiation postings and barriers. Emphasis will be given to this subject in future training sessions.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Reposting of the area in question was complete on April 17, 1980. Basic radiation protection training of contractor personnel was complete on May 18, 1980.