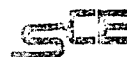


*Southern California Edison Company*

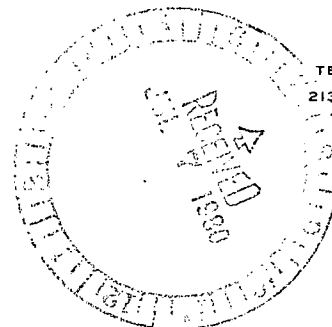


P. O. BOX 800

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L. T. PAPAY  
VICE PRESIDENT

July 1, 1980



TELEPHONE  
213-572-1474

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region V  
1990 North California Boulevard  
Suite 202  
Walnut Creek, California 49596

Attention: Mr. R. H. Engelken, Director

DOCKET NO. 50-206  
SAN ONOFRE - UNIT 1

Dear Sir:

Reference: Letter from NRC (Mr. H. E. Book) to SCE (Dr. L. T. Papay)  
dated June 11, 1980, forwarding Inspection Report No. 50-206/80-14.

Appendix A to the referenced letter contains a Notice of Violation relating to certain activities judged not to be in full compliance with NRC requirements. The area of noncompliance was identified as an infraction. Pursuant to the requirements of 10CFR, Part 2, Section 2.201 the following is submitted:

Item I

Technical Specification Section 6.11 requires that written procedures for personnel protection shall be prepared consistent with the requirements of 10CFR20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure. Procedure S-VII-1.4 Rev 5, April 1979, "Entering and Leaving Steam Generators", (a) Section III B2 requires that airborne particulate and iodine levels be determined for each steam generator involved prior to entry, and (b) Section III E2 requires that the worker who enters a steam generator stand still after exiting, and that the assigned Chemical Radiation Technician remove items of special protective clothing and equipment.

Contrary to the above, on April 12, 1980, work involving entry into steam generators "A", "B", and "C" was performed and airborne activity surveys were not performed for each generator involved and the special protective clothing and equipment was removed by workers other than the assigned Chemical Radiation Technician.

Response:

The investigation showed that the violations of procedures occurred due to lack of experience of the individuals involved and the unplanned nature of the job due to early opening of the steam generators for work.

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Mr. R. H. Engelken  
July 1, 1980  
Page 2

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1) Corrective steps which have been taken and the results achieved:

Radiation Protection Procedure S-VII-1.4 has been revised to emphasize preplanning (tailboard) sessions prior to the initial entry each day. Proper protective clothing and equipment use is also stressed. Experienced Chemical Radiation Technicians will be assigned to each entry.

Procedure S-VII-1.4 also requires the use of supplied air hoods for each entry into the steam generators as well as the support personnel on the steam generator platform.

The frequency of air samples inside the steam generators has been increased to once per shift during multiple steam generator entries in addition to the initial sampling of each generator.

The above procedures have been in force since May 10, 1980 and have proven effective in preventing external and internal personnel contamination.

2) Corrective steps which will be taken to avoid further violations:

Initial tailboard sessions will be held for each crew during an outage. Radiation protection Procedures S-VII-1.4 will be reviewed in as much detail as appropriate. This will be repeated for each new crew member throughout the outage.

Proper tools and equipment will be provided prior to attempting any entry. Only experienced Chemical Radiation Technicians will be assigned to this job. One Technician will be assigned to each steam generator entry.


Air sampling of the steam generators will be performed prior to initial entry and once per shift during multiple entries.

3) Date when full compliance will be achieved:

Radiation Protection Procedure S-VII-1.4 has been revised effective May 10, 1980 to reflect all of the above items. This procedure is currently in effect for all steam generator entries. Full compliance has been achieved. All personnel will be provided training as outlined in this procedure for any future steam generator entries.

Please contact us should you have any questions concerning the above.

Sincerely,



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