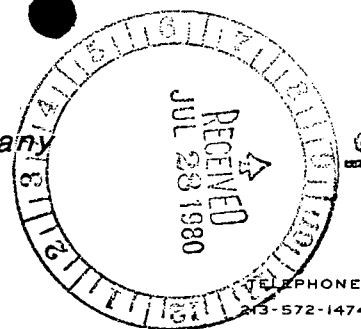


*Southern California Edison Company*

P. O. BOX 800

2244 WALNUT GROVE AVENUE  
ROSEMEAD, CALIFORNIA 91770

L. T. PAPAY  
VICE PRESIDENT



July 17, 1980

Mr. R. H. Engelken, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region V  
Suite 202, Walnut Creek Plaza  
1900 North California Boulevard  
Walnut Creek, California 94596

Dear Mr. Engelken:

Subject: Docket No. 50-206  
San Onofre Nuclear Generating Station, Unit 1

In a letter from your office dated July 3, 1980, we were requested to respond to a Notice of Deviation and a Notice of Deficiency resulting from an inspection of San Onofre Unit 1 which took place May 5-30, 1980. Enclosures I and II to this letter provide our responses to these Notices.

I trust the enclosures respond adequately to all aspects of the Notices. If you have any questions or if we can provide additional information, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read 'L. T. Papay'.

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

WWS:nll

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80-218

ENCLOSURE 1

RESPONSE TO NOTICE OF VIOLATION

ITEM

Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI 18.7-1976.

ANSI 18.7-1976, Paragraph 5.3, requires that activities affecting safety at nuclear power plants be described by written procedures of a type appropriate to the circumstances and be accomplished in accordance with these procedures.

Operating Instruction, S-3-1.3, and associated Calculation Sheet 1, is the procedure for the shutdown margin calculation to determine the correct shutdown margin required by Technical Specification 3.6.B whenever containment integrity is to be breached.

Contrary to the above requirements, on April 9, 1980, Operating Instruction S-3-1.3 was not properly implemented. This resulted in the calculation of an erroneous required boron concentration of 840 ppm. The actual required boron concentration was 761 ppm.

This is a deficiency.

RESPONSE:

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

The shutdown margin was properly recomputed utilizing Operating Instruction S-3-1.3 and found to be 761 ppm. 840 ppm of boron had been added to the Reactor Coolant System (RCS) in accordance with the erroneous calculation. This resulted in an excess of 79 ppm above that required for the shutdown margin and is thus more conservative than required. The corrected computation has been properly filed.

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

Operating Instruction S-3-1.3 and its associated check-off list will be revised to clarify the procedural steps. For example the error in the computation noted in the violation was caused by the use of the wrong graph when looking up a constant value. The revised procedure specifies the exact graphs or table to be utilized.

3) Date when full compliance will be achieved:

The Operating Instruction and associated check-off lists will be revised by September 15, 1980.

ENCLOSURE II

RESPONSE TO NOTICE OF DEVIATION

ITEM

ANSI 18.7-1976, Paragraph 5.2.10, "Housekeeping and Cleanliness Control," states that ANSI N45.2.3-1973 shall be applied to those activities occurring during the operational phase that are comparable in nature and extend to related activities occurring during construction.

ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants," defines housekeeping requirements for the control of work activities affecting quality in a nuclear power plant.

ANSI N45.2.3-1973, Paragraph 3.2.1, "Cleanness," states that work areas shall be kept sufficiently clean and orderly ... where large accumulations of materials occur on a nonroutine basis, the material shall be promptly removed or stored neatly. Garbage, trash, scrap, litter and other excess materials shall be collected with specified requirements or planned practices. Such excess material shall not be allowed to accumulate and create conditions that will adversely affect quality."

Contrary to these regulatory guidelines, housekeeping, on two occasions at San Onofre Unit 1, was observed to be significantly dirty and disorganized. Specifically, on May 14, 1980, the charging pump room, where work was in progress on the charging pumps and the boric acid system, was extremely dirty. Debris covered most of the floor. The debris appeared to consist of piles of core drilling dust, used protective clothing, discarded lumber, untended welding and electrical cables, disassembled scaffolding components, polyethylene sheeting, and dirt. Also on May 1, 1980, large amounts of combustible materials were located adjacent to the containment sphere equipment hatch.

This is a deviation.

RESPONSE

1) Cause of Deviation

Our previous policy was to assign personnel to clean up in areas on completion of a project or at infrequent times at the end of shift. This resulted in the debris noted in the deviation accumulating during a job.

2) Steps taken to correct the Deviation

The specific areas indicated in the deviation have been cleared up and debris removed.

ENCLOSURE II (continued)

3) Steps taken to prevent recurrence

Our policy has been changed to require assignment of cleaning and pickup personnel to each job during the work. Debris will be picked up and areas kept clean during a job rather than at the end of the job or at the end of a shift. This policy was implemented in June 1980.