



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1990 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

July 7, 1980

MEMORANDUM FOR: J. L. Crews, Chief, Reactor Operations and Nuclear Support
Branch, Region V

FROM: Regional Evaluation Review Board - San Onofre Unit 1

SUBJECT: REGIONAL EVALUATION OF SAN ONOFRE UNIT 1 - MAY 1979
THROUGH MAY 1980

The Regional Evaluation Review Board, consisting of representatives from Reactor Operations, Construction, Radiation Protection, Safeguards, and NRR, met on June 12, 1980, and performed an evaluation of San Onofre Unit 1 activities for the period of May 15, 1979 through May 15, 1980. The Board's review encompassed the following:

1. Licensee performance in each of the 17 functional areas identified in Appendix A of MC 2955.
2. Enforcement actions for the period of May 15, 1979 through May 15, 1980.
3. Licensee event reports submitted during the period of May 15, 1979 through May 15, 1980.

It is the opinion of the Board, based upon the results of the review, that increased or special inspection activity be performed in the functional areas of surveillance and preoperational testing, design changes and modifications, and Quality Control.

Since San Onofre Unit 1 does not have standardized Technical Specifications, the Board is concerned that all safety related systems and components may not receive sufficient surveillance testing to assure reliable operation. Following the event on May 10, 1980, when the North, South, and Auxiliary Salt Water Cooling System pumps became inoperable, Southern California Edison (SCE) management committed, in an Immediate Action Letter dated April 4, 1980, to conduct a review of the surveillance and maintenance programs for the Salt Water Cooling pumps and other safety related equipment identified in the Technical Specifications to verify they are adequate to assure system reliability. In addition to SCE's review, the Board recommends that the NRC conduct a special inspection to determine the adequacy of the San Onofre Unit 1 surveillance testing program and identify any basic differences in the surveillance testing requirements contained in the San Onofre Unit 1 Technical Specifications vs the Westinghouse Standardized Technical Specifications.

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Because of the large number of modifications being made at San Onofre Unit 1, primarily as a result of fire protection and TMI Lessons Learned Modifications required by the NRC, the Board recommends that an increase in the frequency and scope of NRC inspections in the functional area of design changes and modifications be performed. The current NRC inspection effort (frequency and scope) is providing sufficient information to determine whether or not modifications are being completed, but does not provide sufficient information to adequately evaluate the quality aspects of the modifications.

In the functional area of quality control, the Board has concerns regarding the fact that a significant increase in on-site quality control activities is being required as a result of fire protection modifications, TMI related modifications, and IE Bulletin response work. Quality control coverage, for these modifications and response work, is being provided by the Bechtel Corporation, SCE Quality Assurance, or SCE Construction Maintenance Inspection, dependent upon the type of work involved. Southern California Edison, San Onofre Unit 1, does not presently have a separate quality control group. Because of the increased quality control activity and the absence of a separate Southern California Edison, San Onofre Unit 1, Quality Control Group, the Board believes that an increase in NRC inspection frequency and scope, in the functional area of Quality Control, is needed to provide additional assurance that adequate quality control coverage is being provided.

The Board has concerns relating to preventive maintenance. These concerns developed as a result of the March 10, 1980 Loss of Salt Water Cooling System event and from the results of inspections conducted by the NRC Performance Appraisal Branch (PAB) during February 1979. PAB found that the San Onofre Unit 1 preventive maintenance program failed to cover all safety related pumps, valves, etc. However, the Board is not recommending an increase in NRC inspection activity in this functional area because Southern California Edison has contracted with the NUS Corporation to develop a detailed, comprehensive and integrated preventive maintenance program (scheduled completion date is November 30, 1980), and has also committed in the Immediate Action Letter dated April 4, 1980, to review the adequacy of maintenance programs for the Salt Water Cooling System and other safety related equipment described in the Technical Specifications.

Licensee actions and performance as related to enforcement activities and Licensee Event Reports during the period of May 15, 1979 through May 15, 1980, appear to be adequate. No specific changes in licensee programs or NRC inspection activity is recommended.

The Evaluation Forms from IE Manual Chapter 2955 have been completed by the Board, for San Onofre Unit 1, and are being submitted as Attachment A.

B.H. Faulkenberry
B. H. Faulkenberry, Chief
Reactor Projects Section #2

J.R. Curtis
J. R. Curtis
Radiation Specialist

B.H. Faulkenberry /fsc
D. P. Haist
Reactor Inspector

A. Horn
A. Horn
Reactor Inspector

A.D. Johnson
A. D. Johnson
Enforcement Coordinator

B.H. Faulkenberry /fsc
L. F. Miller
Resident Inspector

Wayne P. Mortensen
W. P. Mortensen
Physical Protection Inspector

B.H. Faulkenberry /fsc
T. V. Wambach
Project Manager, NRR

Enclosure:
As Stated

LICENSEE PERFORMANCE EVALUATION (OPERATIONS)

Facility: San Onofre Nuclear Generating Station

Licensee: Southern California Edison Company

Unit Identification: SONGS-1

<u>Docket No.</u>	<u>License No./Date of Issuance</u>	<u>Unit No.</u>
50-206	DPR-13 / 3/27/67	1

Reactor Information:	<u>Unit 1</u>	<u>Unit 2</u>	<u>Unit 3</u>
NSSS	Westinghouse		
MWt	1347		

Appraisal Period: May 15, 1979 thru May 15, 1980

Appraisal Completion Date: June 13, 1980

Review Board Members: Region V: Bob Faulkenberry
 Dick Curtis
 Dennis Haist
 Alan Horn
 Al Johnson
 Lew Miller
 Wayne Mortensen

NRR: Tom Wambach

A. Number and Nature of Noncompliance Items

Noncompliance category:	<u>Unit 1</u>	<u>Unit 2</u>	<u>Unit 3</u>
Violations	--		
Infractions	17		
Deficiencies	8		

Areas of Noncompliance: (List Areas as Required)	<u>Unit 1 (Points)</u>	<u>Unit 2 (Points)</u>	<u>Unit 3 (Points)</u>
Plant Operations	20		
Maintenance	22		
Surveillance	20		
Design Changes & Modifications	10		
Reporting	12		
Quality Control/Assurance	22		
Radiation Protection	30		
Security and Safeguards	50		

Total Points	186		
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Number and Nature of Licensee Event Reports

Type of Events:	<u>Unit 1</u>	<u>Unit 2</u>	<u>Unit 3</u>
Personnel errors	8		
Defective procedures	2		
Casually-linked events	-		
Other	26		

Licensee Event Reports Reviewed (Report Nos.)

79-007 thru 79-026

80-001 thru 80-017

C. Escalated Enforcement Actions

Civil Penalties

None

Orders

- 1/02/80 - Show Cause - Implement short term lessons learned (TMI) Category A requirements by 1/31/80 or shutdown. SONGS-1 shutdown to implement necessary changes except where availability of equipment prevented changes. To complete work by June 1, 1980. (Open)
- 4/04/80 - Confirmatory - Licensee to respond to Appendix A (basically IEB 79-27) by May 15, 1980. (Open)

Immediate Action Letters

- 6/08/79 - Remain shutdown pending report on probable causes of cracking in feedwater piping and corrective actions taken or to be taken and NRC concurrence received on the appropriateness of the corrective measures taken. (Closed)
- 6/14/79 - Concurred with response to above and additionally licensee will:
1. Conduct baseline exams of the repairs - reinspect no later than next refueling.
 2. Submit interim written report to NRC concerning analysis of causes of cracks and corrective action taken. (Open)
- 4/04/80 - Understanding of actions to be taken by licensee regarding SWCS operation. (Open)
- 4/23/80 - *

D. Management Conferences Held During Past Twelve Months

- 4/03/80 - Discussion of possible items of noncompliance associated with the loss of the Salt Water Cooling System on March 10, 1980.

E. Justification of Evaluations of Functional Areas Categorized as Requiring an Increase in Inspection Frequency/Scope (See evaluation sheets)

SCE Memorandum from Regional Evaluation Review Board - San Onofre Unit 1 to J. L. Crews, dated July 7, 1980.

*Regarding Loss of All AC Power on 4/22/80. Licensee actions to be taken:

1. Effective immediately - Implement requirements similar to Westinghouse STS 3.8.1.2.
2. With less than minimum required AC sources all operations involving core alterations of positive reactivity changes will be suspended.

Inspection
Frequency and/or Scope

FUNCTIONAL AREA	Increase	No. Change	Decrease
1. Management Control		X	
2. Plant Operations		X	
3. Refueling Operations & Activities		X	
4. Maintenance		X	
5. Surveillance & Preoperational Testing	X		
6. Training		X	
7. Radiation Protection		X	
8. Environmental Protection		X	
9. Emergency Planning		X	
10. Fire Protection		X	
11. Security & Safeguards		X	
12. Design Changes & Modifications	X		
Reporting		X	
14. QA Audits		X	
15. Committee Activities		X	
16. Quality Control	X		
17. Procurement		X	


 B. H. Faulkenberry, Chief
 Reactor Projects Section #2

July 7, 1980

Date