

Southern California Edison Company

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HAROLD B. RAY
VICE PRESIDENT

January 31, 1990

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Mr. Ross A. Scarano, Director
Division of Radiation Safety and Safeguards
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Dear Mr. Scarano:

Subject: **Docket Nos. 50-206, 50-361 and 50-362**
Radiation Protection Program
San Onofre Nuclear Generating Station

Your letter dated December 8, 1989 forwarded San Onofre Inspection Report 89-28 and an associated Notice of Violation (NOV). My letter dated December 20, 1989 responded to a comment in your letter concerning our self assessment in the area of respiratory protection. My letter dated January 8, 1990 responded to the NOV and indicated that a further response to a comment in your letter concerning a potential declining trend in our radiation protection program would be provided by January 19, 1990. The purpose of this letter is to submit that further response.

Your letter dated December 8, 1989 included the following comment:

"The findings in the area of respiratory protective equipment maintenance tend to indicate a lack of attention to detail, inadequate training and insufficient supervisory oversight. These findings might indicate a declining trend in performance for the radiation protection program."

We are committed to maintaining a high standard of excellence in our radiation protection program, and I believe it is therefore appropriate to summarize for your information our response to your comment. This letter has been delayed in order to evaluate the possibility of a connection between the findings in Inspection Report 89-28 and earlier findings documented in your Inspection Report 89-03 concerning control of radioactive material.

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With respect to the specific findings discussed in the two inspection reports, they of course are in significantly different areas. Inspection Report 89-03 findings concern control of radioactive material and Inspection Report 89-28 findings concern respiratory protective equipment maintenance. The findings in both reports could be related to the general need for attention to detail, training and supervisory oversight. However, following careful review we conclude that they are not related to any significant extent.

Based on our review, an element that could be common to some of the findings in both reports is the level of the ongoing workload performed by supervision and management in our Health Physics Program. It is noted that SCE's oversight organization had already identified problems in both areas, as documented in the respective NRC inspection reports. These problems might have been recognized and avoided by Health Physics supervision and management as well, providing they had devoted additional time to this objective.

We do not believe the findings described in Inspection Report 89-28 reflect a declining trend in performance, but both they and the findings in Inspection Report 89-03 do reflect a need for us to take steps to ensure that our Health Physics supervision and management resources are able to consistently direct and control all elements of our program to a high standard of excellence. These steps will include a formal assessment during the upcoming Unit 3 refueling of individual workloads and allocation of time spent on the job.

In evaluating whether there is a declining trend in our program, we reviewed performance monitoring data and other developments with the following results:

- o SONGS collective radiation exposures remain in the upper industry quartile (200 person-rem per unit, versus an industry quartile of 248), despite 404 outage days in 1989.
- o Solid radioactive waste shipments also remain in the upper industry quartile (90 cubic meters per unit versus an industry quartile of 120).
- o Strong support for professional development continues (National Registry, Radiological Protection Technologists: 38 persons registered - American Board of Health Physics: 10 persons certified).
- o Expanded training is being provided to site workers in radiation protection jobsite practical factors, with issuance of a convenient worker handbook for use on the job.

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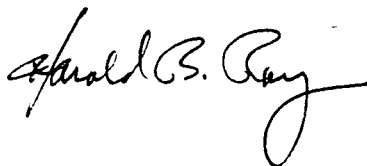
- o An expanded personnel performance recognition program has been established with monetary awards for high quality individual performance in areas of radiation protection and physical safety.

Overall, we believe that a commitment to excellence is being maintained throughout our Health Physics Program. However, as indicated above, we need to take action to ensure that this commitment can be consistently sustained, in particular with respect to supervisory and management workload. We will identify and implement any changes which we conclude are necessary in this regard by August 31, 1990. In addition, we will take action to ensure that:

- o Our program elements are current. For example, we are carefully examining the personnel dosimetry segment of our program to ensure we are using state-of-the-art methodology.
- o Our program elements are well implemented. For example, we are reviewing implementation of our portable survey instrument procedures.

If you have any questions or comments, or if you would like additional information, please let me know.

Sincerely,



cc: John B. Martin, Regional Administrator, Region V
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre