

*Southern California Edison Company*

23 PARKER STREET  
IRVINE, CALIFORNIA 92718

HAROLD B. RAY  
VICE PRESIDENT

TELEPHONE  
714-458-4400

March 19, 1990

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: **Docket Nos. 50-206, 50-361 and 50-362**  
**Reply to a Notice of Deviation**  
**San Onofre Nuclear Generating Station**

Reference: Letter, Mr. D. F. Kirsch (NRC) to Mr. Harold B. Ray  
(SCE), dated February 16, 1990

In accordance with 10 CFR Part 2, Appendix C, the enclosure to this letter provides the Southern California Edison (SCE) reply to a Notice of Deviation which was issued by the referenced letter.

In discussing the deviation, the referenced letter includes the following comment:

"This deviation emphasizes our concern that you failed to properly manage resolution of this issue, in that you neither notified the NRC of your inability to meet the November commitment nor assessed additional needed action until the item was addressed by the NRC during this inspection."

As discussed in the enclosure, this failure is a consequence of deficiencies in our commitment tracking and closure program which are discussed in my letter to Mr. Kirsch dated November 21, 1989. The action described in that letter is proceeding on schedule and will be fully implemented by June 1, 1990.

In addition, in discussing the technical issue itself, the referenced letter states:

"(A) deviation, attached to this letter, has been issued because you failed to meet a November 15, 1989 commitment to resolve a concern that inservice testing of safety related pumps may not be bounded by your safety analysis... It is also noted that you have extended the date to complete this evaluation each year since its original identification in 1985."

9003230104 900319  
PDR ADOCK 05000206  
Q FDC

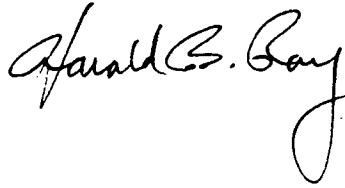
TEO/  
11

March 19, 1990

The technical issue here involves whether the degradation in pump performance which is allowed under the inservice testing requirements of the Code might result in a lower level of performance than is assumed in the various safety analyses for analyzed accident conditions. SCE has assumed that the design adequately considered such degradation when taking credit for pump performance in the analyses, however documentation of this is not readily available in every case, especially with respect to Unit 1. It is noted that SCE initially provided a response to the technical issue following its identification in 1985. Subsequently, the NRC concluded that the response was not acceptable, and the issue was further refined by discussion in 1989. The revised response that is being developed as described in the enclosure is based on the 1989 discussions of the issue.

If you have any questions, or if you require additional information, please let me know.

Sincerely,



Enclosure

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

ENCLOSURE  
REPLY TO A NOTICE OF DEVIATION

Appendix A to Mr. Kirsch's letter dated February 16, 1990 states in part:

"As documented in NRC Inspection Report 50-361/89-21, dated August 15, 1989, SCE stated that a final licensee position document would be issued by November 15, 1989, confirming that in-service testing operability limits for safety related pumps were bounded by the latest safety analysis.

Contrary to the above, as of 1/19/90, a final position document had not been issued."

RESPONSE TO DEVIATION

1. Reasons for the Deviation

The open item that was established in SCE's commitment tracking system to ensure that a satisfactory final position document was issued as scheduled was incorrectly closed on the basis of information which had been developed previously and found unacceptable by the NRC. This occurred as a result of inadequate management review of the bases for closure of the open item.

2. Corrective Steps That Have Been Taken and the Results Achieved

- Incorrect Closure of NRC Open Items

Revised instructions for closure of open items established to track NRC commitments now require approval of the cognizant functional division manager, based on his review of related documentation to verify task completion. In addition, a review is being conducted to: verify that all NRC open items are captured in the tracking program, ensure that all associated tasks are current and that they accurately describe the actions to be performed, and establish that documentation submitted in support of task closure adequately demonstrates task completion. The first phase of this review is nearing completion and the remaining two phases will be completed by August 1, 1990.

- Evaluation of Pump Performance

SCE is proceeding with work to develop performance curves for safety related pumps at Unit 1 and Units 2 and 3 that reflect their accident performance requirements. These curves do not exist presently, and they will permit positive determination of each pump's margin. Substantial

March 19, 1990

engineering effort is required to develop these curves, and they are expected to be completed by June 1, 1991. Review in comparison with in-service testing data is expected to be completed by September 1, 1991. Any modifications to the pump in-service testing program requirements as a result of this comparison will also be implemented by September 1, 1991.

3. Corrective Steps That Will Be Taken to Avoid Further Deviations

As indicated in a letter from H. B. Ray (SCE) to D. F. Kirsch (NRC) dated November 21, 1989, SCE will consolidate its NRC commitment tracking systems and begin using the consolidated system by June 1, 1990. Concurrently, the responsibility for tracking NRC open items, as well as most other NRC-related commitments, will be consolidated and assigned to the Manager of Regulatory Affairs in the Nuclear Engineering, Safety & Licensing Department.

4. Date When Corrective Actions Will Be Completed

The consolidated NRC open item and commitment tracking program will be implemented by June 1, 1990. Review of NRC commitments and tracking program documentation will be completed by August 1, 1990.