Southern California Edison Company
P.O. BOX 800

DAVID N. BARRY III
VICE PRESIDENT AND
GENERAL COUNSEL

TELEPHONE (818) 302-1920

April 24, 1990

2244 WALNUT GROVE AVENUE ROSEMEAD, CALIFORNIA 91770

LAW DEPARTMENT

U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Attention: Document Control Desk

Subject: Free Flow of Information to the NRC

Docket Nos. 50-206, 50-361, 50-362 San Onofre Nuclear Generation Station

Units 1, 2 and 3

Reference: Letter, "Notification of the NRC of

Employees' Potential Safety," Mr. Victor Stello, Jr. to

Mr. Howard P. Allen, dated April 27, 1989

## Gentlemen:

The purpose of this letter is to inform you of the action taken by Southern California Edison (SCE) in response to your request to ensure that no restrictions have been placed on employee, or ex-employee communication with the NRC. The referenced letter asks that SCE review labor agreements and settlements to determine whether clauses exist that may discourage an individual from contacting the NRC about safety concerns.

It has never been SCE's policy to restrict a current or ex-employee's right to communicate with the NRC and, accordingly, we believe that we have never included clauses restricting this right in any current or previous agreements. Although we have never intended to restrict an employee's or ex-employee's right to raise safety issues with the NRC, we recognize that complex confidentiality language included in previous agreements could confuse some former employees as to their rights to contact the NRC on safety issues.

9005030**076** 900424 PDR ADOCK 05000206 P PDC ADDI Add: NER/DOEA/OTSB 1
11 NRR/PMAS/ILRB 1

April 24, 1990

To eliminate any possible confusion, prior to July 1, 1990, we will forward a letter to each individual who formerly had been assigned to a position within our Nuclear program with whom we have entered into a settlement agreement advising, in plain language, that "Nothing in the settlement should be interpreted as restricting your right to raise safety concerns within SCE or directly with the NRC." Additionally, "you are free to communicate to the NRC any safety concerns that you may have at any time without fear of retribution in any form."

Each individual currently assigned to a position in our Nuclear program is periodically reminded directly, by a letter from the Chairman of the Board, of their right to raise safety concerns with their supervision, directly with the On-Site Review Committee, through the confidential Nuclear Safety Concerns program administered by the Nuclear Oversight organization, or directly to the NRC without fear of retribution. Enclosure 1 is the most recent of these letters.

In summary, it is not our policy to restrict any individual's right to raise safety concerns with the NRC, and we believe we have never done so. Since complex legal settlement language can be confusing to some, we will provide each individual currently or previously assigned to a position within our Nuclear program who entered into a settlement agreement with SCE a letter stating clearly and simply that they are free to contact the NRC concerning safety matters at any time.

Very truly yours,

Pand U. Bany II

David N. Barry, III

Enclosure

Southern California Edison Company

P. O. BOX 800

2244 WALNUT GROVE AVENUE ROSEMEAD, CALIFORNIA 91770

HOWARD P. ALLEN
CHAIRMAN OF THE BOARD AND
CHIEF EXECUTIVE OFFICER

May 26, 1989

TELEPHONE 818-302-2777

## TO ALL PERSONNEL:

INFORMATION SERVICES
NUCLEAR ENGINEERING, SAFETY & LICENSING
NUCLEAR GENERATION SITE
POWER SUPPLY
PROCUREMENT AND MATERIAL MANAGEMENT
ENGINEERING, PLANNING AND RESEARCH

SUBJECT: Review Process for Nuclear Safety Concerns

Since 1967, when the Company received an operating license for San Onofre Unit 1, safety review organizations have been in effect whose functions include review and initiation of action to solve problems related to nuclear safety at San Onofre. These organizations now include the "On-Site Review Committee" located at San Onofre and the "Nuclear Safety Group" at the Irvine Operations Center. These organizations are available to consider questions or concerns related to nuclear safety from employees who become aware of existing or potential serious problems.

In keeping with long-standing practice, should you have a nuclear safety question or concern related to a Company facility, the matter should be brought to the attention of your supervisor. He or she will, in consultation with the proper personnel, resolve the question and advise you of the resolution if you so request. If you do not feel the question or concern was satisfactorily resolved, you should notify the head of the appropriate safety review organization.

The head of the appropriate safety review organization for personnel working at San Onofre is the Chairman of the On-Site Review Committee and for other personnel this is the Manager of Nuclear Oversight. In order to ensure your concern is properly understood and that you are informed of the outcome, this notification describing your concern should be in writing.

In a further effort to assure that nuclear safety concerns are brought to the attention of appropriate management and are resolved in a satisfactory manner, an alternate means is provided. "Nuclear Safety Concerns Program" exists which is administered by This organization is the SCE Quality Assurance Organization. independent of plant management. This program is available if you are not comfortable in openly discussing your concern with your supervisor or the safety review organization or you do not believe that your concerns have been satisfactorily reviewed. Your concern may be made anonymously if desired. Following review of your concern, you will be notified of the outcome if your report was not anonymous. You should also be aware that the records of these actions are subject to audit by the Nuclear Regulatory Commission, and the disposition of your concern will be made a part of those records.

In addition to the above, you may also take your concern directly to the Nuclear Regulatory Commission by notifying any member of the NRC staff, including the resident inspectors assigned to San Onofre.

Additionally, if your apprehension for openly discussing your concern is based upon a concern of harassment, intimidation or other form of discrimination, please be assured that SCE does not condone nor support any of these actions. It is the Company's policy to encourage an open atmosphere for self-criticism without the threat of retribution against employees who voice their concern. Violators of this policy will be subject to disciplinary action.

As you know, we are relying on nuclear generating stations for a significant share of our future generating capacity and are dedicated to maintaining our exemplary nuclear safety record. To accomplish this, it is important that potential nuclear safety questions be identified and promptly resolved. Each employee involved in the Company's nuclear program should consider nuclear safety and compliance with NRC regulations as the first priority in executing his or her duties.

This procedure is in addition to and does not supersede rights or obligations provided under the regulations of the Nuclear Regulatory Commission or the Energy Reorganization Act of 1974, as amended.

