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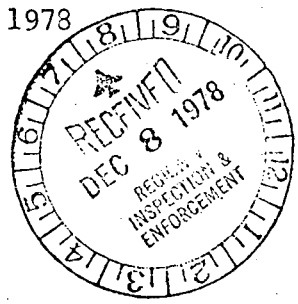
December 6, 1978



U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
Walnut Creek Plaza, Suite 202
1990 North California Boulevard
Walnut Creek, California 94596

Attention: Mr. G. S. Spencer, Chief
Reactor Construction and Engineering
Support Branch

Docket No. 50-206
San Onofre Unit 1

Dear Sir:

Reference: Letter from USNRC (G. S. Spencer) to SCE (J. B. Moore) dated November 15, 1978, Forwarding IE Inspection Report, No. 50-206/78-14

The reference letter presents your findings in connection with NRC inspections of SCE inservice inspection activities which were conducted during the San Onofre Unit 1 Cycle VII refueling outage. Your letter states that certain inservice inspection activities apparently were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation in Appendix A to the letter. Specifically, certain examinations were not performed in accordance with the requirements of Section XI of the ASME Code through and including the Summer, 1975 Addenda and the examination methods used were not shown to provide results of demonstrated equivalence or superiority to those specified in the Code. The Notice of Violation categorized this condition of noncompliance as an infraction.

The purpose of this letter is to provide our response to the Notice of Violation in accordance with the provisions of Section 2.201, Part 2, 10CFR as applicable. The specific items of noncompliance identified in the Notice of Violation and our responses to these are presented below.

Item 1 "Straight beam, axial scan, ultrasonic examination of reactor vessel closure studs 1-14, Class 1 components, utilized a back reflection technique for calibration rather than a calibration block equipped with reflectors and establishment of a distance amplitude curve for evaluating indications as required by paragraph T-525.2 of Article 5 of Section V."

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

A calibration block equipped with reflectors as required by paragraph T-525.2 of Article 5 of Section V has been obtained and a program to evaluate the equivalence of the back reflection technique to the calibration block technique has been initiated. If the results demonstrate that the back reflection technique is equivalent or superior to the calibration block technique of paragraph T-525.2 of Article 5, then the axial scans performed in the October, 1978, ISI on reactor vessel closure studs 1-14 will be used to satisfy the examination requirements of Section XI. If equivalence or superiority cannot be demonstrated, the axial scans on studs 1-14 will be repeated using a qualified procedure at the next inservice inspection. Since Section XI requires only that the stud volumetric examinations be completed during the 10 year inspection interval, this revised schedule is in accordance with the code.

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

SCE reviews all inservice inspection procedures prior to each inspection to ensure that the required provisions of our ISI program are satisfied.

Whenever such provisions cannot be met due to geometry, design, or material limitations, justification for these exceptions will be documented and relief from such provisions will be requested from the NRC per 10 CFR 50.55a(g)(5).

(3) The date when full compliance will be achieved:

During the next inservice inspection, presently scheduled for March, 1980, each inservice inspection procedure used will be in compliance with the code or documentation of the equivalence or superiority of the procedure to the code methods will be provided in accordance with IWA-2240 of ASME Section XI.

Item 2 "Surface examinations of the reactor vessel closure nuts 1-14, Class 1 components, did not include threads in the base material."

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

Surface examinations of reactor vessel closure nuts 1-14 will be repeated during the next inservice inspection and will include the threads in the base material. This examination will satisfy the requirements of the code for a surface examination of all of the nuts during the ten year interval which began January 1, 1978.

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

SCE reviews all inservice procedures prior to each inspection to ensure that the required provisions of our ISI program are satisfied.

Whenever such provisions cannot be met due to geometry, design, or material limitations, justification for these exceptions will be documented and relief from such provisions will be requested from the NRC per 10 CFR 50.55a(g)(5).

(3) The date when full compliance will be achieved:

During the next inservice inspection, presently scheduled for March, 1980, each inservice inspection procedure used will be in compliance with the code or documentation of the equivalence or superiority of the procedure to the code methods will be provided in accordance with IWA-2240 of ASME Section XI.

Should you have any questions concerning the above responses, please contact me.

Sincerely,