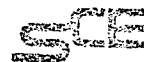


Southern California Edison Company



P. O. BOX 800  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CALIFORNIA 91770

A. ARENAL  
VICE PRESIDENT

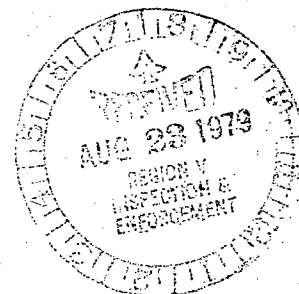
TELEPHONE  
213-572-1476

August 21, 1979

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

Attention: J. L. Crews, Chief  
Reactor Operations and  
Nuclear Support Branch

Docket No. 50-206  
San Onofre Unit 1



Dear Sir:

Reference: Letter from USNRC (J. L. Crews) to SCE (J. B. Moore) dated August 1, 1979. Subject: NRC Inspection - San Onofre Unit 1 (I.E. Inspection Report No. 50-206/79-09)

The referenced letter presents your finding in connection with the NRC inspection of June 20 - 22, 1979. Your letter states that certain of our activities apparently were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation in Appendix A to your letter. Specifically, contrary to Technical Specification Table 4.1.1, the daily test of the Area Radiation Monitoring System was not performed on June 18, 1979 and, contrary to Technical Specification 6.8.2, certain station procedures were revised without required review of the document changes by OSRC. The Notice of Violation categorized these items of noncompliance as infractions.

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, 10 CFR as applicable. The specific items of noncompliance and our responses are presented below.

Item 1 "Technical Specification Table 4.1.1, Item 18, indicates that a surveillance test on the area radiation monitors is to be performed daily.

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Contrary to the above, on June 18, 1979, documents were not available to show that the referenced surveillance test was conducted.

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

A review of pertinent procedures and records indicate that this was an isolated occurrence. The corrective action taken is described below.

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

To prevent a recurrence of this incident a system of test compliance review by the swing shift Watch Engineer has been initiated. This review will assure that all tests required by the Technical Specifications and station procedures are accomplished during each 24 hour period. The results of this review will be documented in the Watch Engineer's log.

3) The date when full compliance will be achieved:

Full compliance on this item has been achieved.

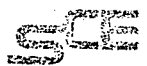
Item 2

"Technical Specification 6.8.2 states, "Each procedure and administrative policy of 6.8.1 above and changes thereto shall be reviewed by the OSRC and approved by the Plant Manager prior to implementation."

Station Order S-A-109, "Station Documents - Preparation, Revision and Review," Section III, states in part, "Temporary operating memorandums ... shall be prepared any time there is a change made which significantly affects a station document. These operating memorandums must be approved by the On-Site Review Committee."

Contrary to the above, Maintenance Procedures S-I-2.6 and S-1-1.59 were performed on October 17 & 18, 1978, respectively, with significant changes in effect and without appropriate document changes and reviews."

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



The subject procedure revisions are being processed through normal review per Station Order S-A-109.

- 2) Corrective steps which will be taken to avoid further violations:

A memorandum has been issued by the Station Superintendent to all department heads stressing the importance of proper review of procedure revisions. In addition, all QA site personnel have been cautioned by the QA/QC Supervisor on the significance of this incident and the importance of ensuring that Station Order S-A-109 is complied with. QA personnel have acknowledged an understanding of the circumstances.

- 3) The date when full compliance will be achieved.

Full compliance has been achieved.

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

Sincerely,

*A. Arenal*