U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-206/79-09

Docket No. 50-206 License No. DPR-13 Safeguards Group

Licensee: Southern California Edison Company

2244 Walnut Grove Avenue

Rosemead, California 91770

Facility Name: San Onofre Unit 1

Inspection at: San Onofre Unit 1, Camp Pendleton, California

Inspection conducted: June 20-22, 1979

Inspectors: B.H. Faulkenberry July 30, 1979
for Harvey L. Canter, Reactor Inspector — Date Signed

Mario Bagaglio, Reactor Inspector — July 27, 1979
Date Signed

Date Signed

Approved By: B.H. Faulkenberry July 30, 1979
B. H. Faulkenberry, Chief, Reactor Project Section 2, Reactor Operations and Nuclear Support Branch — Date Signed

Summary:

Inspection on June 20-22, 1979 (Report No. 50-206/79-09)
Areas Inspected: Routine, unannounced inspection of plant operations; calibration; maintenance; licensee event followup; IE Bulletin followup; and independent inspection effort. The inspection involved 40 inspector hours by two NRC inspectors.

Results: No items of noncompliance were identified in four areas; two apparent items of noncompliance were identified in two areas (Infraction - Failure to perform a daily surveillance test - Paragraph 2; and Infraction - Changing procedures without obtaining appropriate reviews - Paragraph 4).

RV Form 219(2)

9

DETAILS

1. Persons Contacted

H. Ottoson, Manager, Nuclear Generation
*J. Curran, Plant Manager
*D. Nunn, Manager, Quality Assurance
*H. Morgan, Superintendent, Units 2/3
*D. Dunn, Project Quality Assurance Supervisor
*G. McDonald, Site Quality Assurance Supervisor
*J. Tate, Acting Supervisor of Plant Operations
*G. Beetz, Acting Supervisor of Plant Maintenance
*W. Frick, Nuclear Engineer
*R. Surgott, Supervisor of Plant Instrumentation

The inspectors also interviewed other licensee employees during the course of the inspection. They included reactor and auxiliary operators, shift supervisors, maintenance personnel, and plant staff engineers.

*Denotes those attending Exit Interview.

2. Plant Operations

A review of plant operations was conducted, including examination of the Lifted Leads Log; the Watch Engineer's Log, June 11-20, 1979; the Generating Station Log, May 19-June 19, 1979; and the On-Shift Routine Test Check-off Log, June 1979. The condition of control panel indications was examined, and the status of the plant was discussed with licensed operators on duty. During plant tours, observations were made regarding plant security controls, health physics controls, status of alarms, monitoring instruments, fire protection equipment, auxiliary feed system watch, and other plant conditions.

The inspector noted in this review that documentation was not available to show that the Daily Surveillance Test on the ARMS (Area Radiation Monitoring System) had been performed on June 18, 1979, as required by Table 4.1.1 in the facility technical specifications. Interviews with the watch engineers on duty on June 18, 1979 indicated that they were aware that the surveillance test had not been conducted. This is an item of noncompliance. (Infraction 79-09-1)

Subsequent to the inspector's identification of the above item of apparent noncompliance, the Acting Supervisor of Plant Operations wrote a memorandum to the watch engineers instructing the swing shift watch engineer to review the status of surveillance tests to eliminate similar errors.

3. Calibration

A review of facility records and discussions with licensee representatives verified that the calibration of safety related systems and components had been performed consistent with the requirements of the technical specifications and in accordance with approved procedures by qualified technicians.

A review of primary standard calibrations verified that all test equipment had been calibrated traceable to the National Bureau of Standards. Some minor areas of concern were discovered in the documentation that supports prime standards calibration, specifically:

a. Instrument and Test Procedure S-II-1.9. Procedure P-1 performed on November 7, 1978 on general radio decade boxes (Model 1433T), serial numbers 2993 and 2998, had not been reviewed by a foreman or an instrument engineer when provision had been made for their review in the procedure.

b. One Roylyn pressure gauge (0-60 psig) used as a prime standard in the calibration laboratory failed to meet the vendor tolerance specification during an interim calibration procedure promulgated by the licensee. No evident corrective action was taken to investigate the out-of-specification condition prior to the next required traceable standard calibration. This is an unresolved item (79-09-04).

c. The calibration report on general radio decade box (Model 1433T), serial number 2998, did not have all the inspection data blocks completed. A licensee representative agreed to contact the calibration facility to obtain the missing data.

The licensee agreed that Items a. and b. above are indicative of a need for closer supervisory review of calibration documentation.

No items of noncompliance or deviations were identified.

4. Maintenance

Based on discussions with licensee representatives and a review of facility records, maintenance of safety related equipment and components was found to have been performed in accordance with the licensee's QA program and administrative controls, with the following exceptions:

a. An unauthorized change was made to Maintenance Procedure S-I-2.6 which consisted of lowering a torque setting on handhole cover bolts from 600 ft-lbs to 450 ft-lbs. The procedure with the

unauthorized change was performed on October 17, 1978, reviewed by the supervisor of Plant Maintenance on November 14, 1978, and reviewed by the QA engineer on November 15, 1978.

b. An unauthorized change was made to Maintenance Procedure S-I-1.59 which deleted the requirement to tack weld the nuts on an inspection port wrapper cover by using a keeper washer with tabs. This procedure with the unauthorized change was performed on October 18, 1978, reviewed by the Supervisor of Plant Maintenance on November 14, 1978 and reviewed by the QA engineer on November 15, 1978.

Technical Specification 6.8, "Procedures," defines certain requirements for performing and reviewing procedure changes. Specifically, 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." This technical specification was apparently not followed in the cases cited above. Also, Station Order S-A-109 defines, among other items, the method to be used to significantly alter station documents. 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."

In both of the cases described above, there was no documentation to show that the procedures were revised and reviewed in accordance with the requirements specified in the technical specifications and Procedure S-A-109. This is an item of noncompliance. (Infraction 79-09-02)

The limiting conditions for operation of the technical specifications were verified to have been met while maintenance was being performed on safety related equipment and components. As applicable, quality control records of maintenance have been maintained, and records also indicate that maintenance was performed by qualified personnel. Specific maintenance records reviewed consisted of the following:

a. Equipment Outage Books (April, September-October 1978).

b. SONGS-1 Refuel Outage Books (four volumes).

c. QC Inspection Procedure S-XII-2-3, "Inspection and Repair of the Diesel Generator System A.C. Snychronons Generators."

5. Licensee Event Followup

(Closed) LER 79-09 (Also LER 78-11 and Open Item 78-15-02)

All actions committed to in the referenced LER's and Open Item were verified to have been completed. It is to be emphasized that the

licensee stated in LER 79-09 that "Should feedwater system water hammer be detected during future plant operations, an investigation will be conducted to determine the severity of the problem and the consequences of the occurrence with regard to snubber operability." This investigation is to include snubber inspections between rigid supports that were affected by the water hammer event.

6. IE Bulletin Followup (Ref: IE Bulletins 79-06, 06A and 06A-Revision 1)

a. (Closed) Item 79-07-1, "Formal Training Sessions"

The licensee issued a TMI Incident Training Program Manual which included, as enclosures, all the memorandums and correspondence associated with the TMI incident up to May 18, 1979. The manual was reviewed and documented by all licensed personnel on May 18-19, 1979. The items mentioned in Item 79-07-1 were addressed.

b. (Closed) Item 79-07-6, "Void Formation Analysis"

Three TOM's (Temporary Operating Memorandums) were issued which address void formation. TOM 226 changes S-3-5.24 by adding a caution about void formation. TOM 225 changes S-3-5.31 by discussing methods to maintain the RCS 50^{o} subcooled. Finally, TOM 217 changes S-3-5.4 by discussing actions to be taken with a leaking PORV and also discusses the process of void formation. These changes address comments in Paragraph 2 to IE Bulletin 79-06A.

c. (Closed) Item 79-07-7, "Verification of Operability"

Procedure S-A-107, "Equipment Outages," was revised to require the watch engineer to verify that equipment has been returned to service. The watch engineer is to log his verification in the Watch Engineer's Log. The verification may be achieved by discussions with the operator who returned the equipment to service or by independent local inspection of the system or component. This response addresses Paragraph 10 to IE Bulletin 79-06A.

d. (Closed) Item 79-07-8, "Schedule of Completion"

The licensee's response to Item 13 of IE Bulletin 79-06A was submitted on May 23, 1979 as required. This response included a schedule of completion for outstanding items per IE Bulletin 79-06A.

7. Unresolved Item (Ref: IE Bulletin 79-06A)

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance,

or deviations. An unresolved item disclosed during the inspection is discussed in the following paragraph.

Paragraph 2.c of IE Report 50-206/79-07 states that a TOM (Temporary Operating Memorandum) would be issued which will be in accordance with IE Bulletin 79-06A, Paragraph 7.c, in that one RCP (Reactor Coolant Pump) will remain operating in each loop as long as the pump(s) is (are) providing forced flow and continued operation shall not result in an unsafe plant condition. The licensee has chosen not to change their Loss of Coolant Procedure (S-3-5.5) to require this operation. Section IV to the Loss of Coolant Procedure requires, as a manual operator action, the stopping of the reactor coolant pumps when a 21% RWST level is reached.

This position is therefore not in conformance with Paragraph 7.c of the referenced IE Bulletin and is therefore an unresolved item (79-09-3).

8. Independent Inspection Effort

The inspectors noted that a copy of the technical specifications located in the control room was not up-to-date. The inspector reminded the licensee that a followup item (79-04-01) exists on the subject of technical specification accuracy. This item will be pursued at a later date.

9. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) on June 22, 1979 at the conclusion of the inspection. They summarized the purpose, scope and findings of the inspection.