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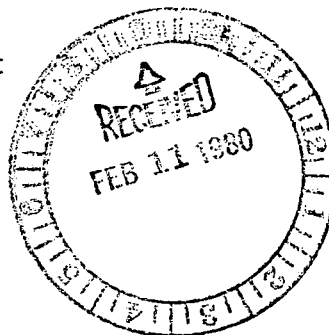
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February 6, 1980

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



Dear Mr. Engelken:

Subject: Docket No. 50-206  
San Onofre Nuclear Generating Station, Unit 1

In a letter from your office dated January 16, 1980, we were requested to respond to a Notice of Violation and a Notice of Deviation resulting from a NRC Management Inspection of San Onofre Unit 1 which took place February 5-16, 1979. Enclosures I and II to this letter provide our responses to these Notices.

I trust the enclosures responded adequately to all aspects of the Notices. If you have any questions, or if we can provide additional information, please let me know.

Very truly yours,

Enclosures

cc: L. F. Miller (NRC, San Onofre Unit 1)

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## ENCLOSURE I

The following provides the SCE response to the Notice of Violation described in Appendix A of the January 16, 1980 letter from the NRC regarding its Management Inspection of San Onofre Unit 1 conducted February 5 through February 16, 1979.

Item A.1      "The licensee's Division Order D-A-2, Station Documents, Section 6, and Station Order S-A-109, Station Documents-Preparation, Revision, and Review, Section 1.B, did not incorporate the requirements and recommendations of ANSI N18.7-1976"

## Response:

1. Corrective Action Taken and Results Achieved:

Division Order D-A-2 is a general order applicable to all SCE steam generating stations and as such does not address the special requirements on station documents at San Onofre Unit 1. Division Order D-A-2 does, however, provide for the issuance of station orders as necessary in order to address those requirements which are unique to a given generating station.

Station Order S-A-109 sets forth the special requirements for preparation, revision and review of station documents at San Onofre Unit 1. Section 1.B of revision 8 of this order does not explicitly incorporate the requirements of ANSI N18.7-1976 regarding the format and content of procedures. This order is being completely revised to meet the requirements of Technical Specification 6.8 relative to ANSI N18.7-1976. This revision is scheduled to be implemented by March 1, 1980.

Pending issuance of revised S-A-109 and effective September 13, 1979, San Onofre Unit 1 supervision has been directed to prepare all new operating instructions and procedures, and revisions to these, in accordance with the format of ANSI N18.7-1976 insofar as is practical.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

All existing station orders, procedures and instructions are in the process of being reviewed and revised as appropriate to be consistent with the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1976. In addition, all new orders, procedures, and instructions and revisions thereto which are prepared subsequent to issuance of Station Order S-A-109, revised as noted above, will be required to meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1976.

3. Date When Full Compliance Will be Achieved:

- a. As noted previously, by March 1, 1980 a new revision of Station Order S-A-109, Station Documents - Preparation, Review and Revision, will be issued which incorporates as a minimum the requirements and recommendations of ANSI N18.7-1976, Sections 5.1 and 5.3.
- b. By November 30, 1980, station written procedures and administrative policies will be established, implemented and maintained in the form of new and revised station orders, procedures, and instructions which meet or exceed the requirements and recommendations of ANSI N18.7-1976, Sections 5.1 and 5.3.

Item A.2

"The licensee had issued no procedures to describe the performance of pump testing such as vibration measurements and bearing temperature measurements as required by 10CFR50.55a(g) and the licensee's identified program for inservice testing of pumps and valves."

Response:

1. Corrective Action Taken and Results Achieved:

Engineering Procedure S-V-2.14, Revision 1 included requirements to perform pump testing, including vibration and bearing temperature measurements. However, detailed instructions on how to perform such tests were not provided in Revision 1. Corrective actions taken to date to rectify these conditions have included:

- a. Preparation of Form PSSO-426 which details the specific data to be taken for each pump in the ISI Pump Testing Program and instrumentation to be used in performing the tests, and
- b. Issuance of Revision 2 of S-V-2.14 which includes instructions on how to take pump vibration and bearing temperature measurements.

2. Corrective Action to be Taken to Avoid Further Noncompliance

Procedure S-V-2.14, Revision 2, "Inservice Testing of Pumps," meets the intent and/or requirements of 10CFR50.55a(g) to the maximum extent practical. This procedure adequately describes the methods of performing the required tests and includes appropriate quantitative and qualitative acceptance criteria for determining that the tests are satisfactorily accomplished. The procedure as revised therefore is considered to meet the requirements of Section 5.1 and 5.3 of ANSI N18.7-1976.

Improvements in test methods and instrumentation that are identified based on data and experience accumulated in the test program will be incorporated into subsequent revisions of S-V-2.14 as appropriate.

3. Date When Full Compliance Will be Achieved:

Engineering Procedure S-V-2.14, Revision 2 dated July 26, 1979 complies with the requirements of Technical Specification 6.8.1 and 10CFR50.55a(g).

Item A.3

"Maintenance Procedure S-I-1.4, "Inspection Repair and Testing of Pressurizer Relief Valves 532 and 533" did not contain appropriate quantitative acceptance criteria which defined acceptable lift pressures for the relief valves."

Response:

1. Corrective Action Taken and Results Achieved:

Although Maintenance Procedure S-I-1.4, "Inspection Repair and Testing of Pressurizer Relief Valves 532 and 533" does not contain quantitative acceptance criteria for the popping pressure settings, it does contain the pressure settings themselves. Acceptance criteria for these settings are contained in Station Order S-M-3, "Maintenance of Pressurizer and Steam Generator Safety Valves". This Station Order references S-I-1.4 and it has been expected that maintenance personnel be knowledgeable of the contents of these documents and their relationship. However, to provide additional assurance that acceptance criteria are observed in the testing of valves 532 and 533, Maintenance Procedure S-I-1.4 is being revised to explicitly address these criteria.

2. Corrective Actions to be Taken to Avoid Further Noncompliance:

The actions described above will avoid further noncompliance.

3. Date When Full Compliance Will be Achieved:

Maintenance Procedure S-I-1.4, revised to include quantitative acceptance criteria, will be issued by April 1, 1980.

Item B.

"The NARC audit of training in 1978 audited only the requalification training of licensed operators and did not include an audit of the performance, training and qualifications of other facility staff members. The committee also failed to audit conformance to TS 3.3.4 in 1978".

Response:

1. Corrective Action Taken and Results Achieved:

- a. NARC audits performed in 1979 (for the year 1978) included the audit of the performance, training and qualifications of the entire facility staff including plant manager, supervisors, professional-technical personnel, operators, technicians, repairmen, fire brigade, and general employees.

The audit reports addressing the above items, reference letters D. E. Nunn to J. M. Curran dated 3/30/79 (Audit Report S01-48-79) and 4/9/79 (Audit Report S01-42-79) and D. E. Nunn to R. S. Currie dated 3/26/79, were reviewed by the NARC at its meeting No. 9-79 of May 2, 1979. The Committee determined, at the meeting, that the training, qualifications and performance of the facility staff were acceptable during the year 1978.

- b. NARC audits performed in 1979 (for the year 1978) included the audit of the facility's conformance to Technical Specification 3.3.4. This audit report, S01-41-79, dated March 26, 1979 was reviewed and approved by the NARC at its meeting No. 9-79 of May 2, 1979.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

- a. A NARC Audit Assignment Log prepared by the NARC Secretary, which contains a complete list of all required NARC audits was put into use in March, 1979. The Log item requiring "the performance, training and qualifications of the entire facility staff" is explicit in its requirement that the audit cover the entire facility staff.
- b. The NARC Charter will be revised in the area of the NARC audit program to require: 1) maintenance of the Audit Assignment Log by the NARC Secretary, 2) a semiannual review of the audit program, including the Audit Log, by the Committee to verify compliance with all applicable requirements including the Technical Specifications and Section 4 of ANSI N18.7-1972, and 3) Committee review of all NARC audit reports.

3. The Date When Full Compliance Will be Achieved:

- a. Full compliance with Item (a) above was achieved in March, 1979.
- b. Full compliance with Item (b) above will be achieved by April 1, 1980.

Item C.

"A Corrective Action Request was not initiated following the Fire Hose Inspection of April 9, 1978, when hoses were found missing from the proper shelter and subsequently found being used by contractors for various jobs other than fire."

Response:

1. Corrective Action Taken and Results Achieved:

Procedures are being prepared requiring that the Fire Hose Inspector conduct inspections at San Onofre, Unit 1 in accordance with the provisions of Appendix A to the Quality Assurance Manual. Additionally contractors have again been notified that use of fire protection equipment for unauthorized purposes is prohibited.

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2. Corrective Action to be Taken to Avoid Further Noncompliance:

In addition to the actions described above, the Fire Hose Inspector will be instructed in writing to discuss the findings of his inspections with site Quality Assurance personnel as well as station Management. Quality Assurance will review these findings against the fire protection program requirements and issue Corrective Action Requests as appropriate.

3. Date When Full Compliance Will be Achieved:

The above actions and directions will be accomplished by April 1, 1980.

Item D.

"No training program for retraining maintenance personnel had been established as evidenced by a review of Station Order S-A-126, Personnel Training, which listed the formal training programs currently in effect, and as supported by discussions with a licensee representative." ole

Response:

1. Corrective Action Taken and Results Achieved:

Presently maintenance supervision performs a review of all maintenance activities prior to initiation of work. Maintenance supervision will be further instructed to review personnel qualifications for those unique or significant maintenance operations that will be performed. If necessary, special training will be provided prior to initiation of work.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

An outside consultant, NUS Corporation, has been engaged to prepare a comprehensive Task Analysis for all maintenance personnel. From this task analysis a training program will be developed to comply with Section 6.4.1 of the Technical Specifications and ANSI N18.1-1971.

3. The Date When Full Compliance Will be Achieved:

The training program will be developed and implemented by November 30, 1980.

Item E.

"OSRC was not providing the Plant Manager with a written determination as to whether or not the procedures and procedure changes which they reviewed constituted an unreviewed safety question." OK

Response:

1. Corrective Action Taken and Results Achieved:

Station Order S-A-109, Station Documents - Preparation, Revision and Review, has been revised to include a specific requirement for OSRC to include in its minutes a written determination of its findings, in regard to a procedure, or procedure revision, as to whether or not the procedure or procedure revision constitutes an unreviewed safety question.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

The above action will avoid further noncompliance.

3. The Date When Full Compliance Will be Achieved:

Station Order S-A-109 has been revised and is scheduled for OSRC approval by March 1, 1980.

Item F.

"Written procedures and policies for a comprehensive preventive maintenance program which must include all appropriate safety related pumps, valves, and other equipment inspection requirements was not provided." OK

Response:

1. Corrective Action Taken and Results Achieved:

Many individual preventative maintenance tasks on safety related components are currently scheduled by a computerized Preventative Maintenance Order, form SCE 29-2. Records of performance of these tasks are retained and reviewed. Additionally, various station procedures prescribe items of preventative maintenance on specific safety related components. Actions have been taken to revise Station Procedure S-I-1.14, "General Maintenance Procedure", such that the requirements of ANSI N18.7 - 1976 and Regulatory Guide 1.33, Revision 1 are addressed. The revised procedure will establish requirements for maintenance schedules and the inspection and replacement of safety related parts that have a specific lifetime.



2. Corrective Action to be Taken to Avoid Further Noncompliance:

An outside contractor (NUS) is currently being engaged to provide a detailed, comprehensive, and integrated preventative maintenance program for all appropriate safety related equipment. When this program is completed it will include frequency of maintenance and procedures for performance of the preventative maintenance tasks and will be integrated into maintenance planning programs now being developed.

3. The Date When Full Compliance Will be Achieved:

- a. Station Procedure S-I-1.14 will be revised, reviewed and approved by April 1, 1980.
- b. The scope of the preventative maintenance program will be completed by November 30, 1980.
- c. The complete preventative maintenance program will be implemented by August 1, 1981.

Item G.

"Live fire fighting demonstrations were not held by or for the generating station during the year 1978; nor were any Fire Brigade monthly training meetings held between September 10 and November 2, 1978." o/l

Response:

1. Corrective Action Taken and Results Achieved:

Station Order S-A-2 currently requires monthly fire fighting training sessions for individuals assigned to the fire brigade. Deletion of the scheduled training meeting for October, 1978 was inadvertently authorized during a Refueling Outage. Live fire fighting demonstrations were not utilized for fire brigade training prior to January, 1979.

Since January, 1979 monthly fire fighting training sessions and an annual fire fighting demonstration have been performed.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

A written station procedure describing fire brigade training and retraining will be written. The procedure will include monthly fire fighting training sessions and annual live fire demonstrations and will incorporate fire brigade training now found in various other procedures.

3. The Date When Full Compliance Will be Achieved:

The above procedure will be prepared, approved and implemented by June 1, 1980.

ENCLOSURE II

The following provides the SCE response to the Notice of Deviation described in Appendix B of the January 16, 1980 letter from the NRC regarding its Management Inspection of San Onofre Unit 1 conducted February 5 through February 16, 1979.

1. CAUSE OF THE DEVIATION

Certain requirements in Section 4.2.1 of ANSI N18.7-1972 were overlooked during the writing of the NARC Charter. Therefore, the Charter does not include a description of the mechanism used for initiating NARC audits nor the identification of the management position to which NARC auditors from QA will report while performing NARC audits.

2. STEPS TAKEN TO CORRECT THE DEVIATION

A revision will be issued to the NARC Charter by April 1, 1980, to include a description of the mechanism used for initiating NARC audits and the identification of the management position to which NARC auditors from the QA Organization will report while performing NARC audits.

3. STEPS TAKEN TO PREVENT RECURRENCE

The NARC Charter will be revised to include all applicable requirements of ANSI N18.7-1972. It will furthermore designate the NARC secretary as responsible for identifying all applicable regulatory requirements and their inclusion into the Charter, subject to Committee approval. The Charter will provide for an annual review by the Committee of the adequacy of the Charter with respect to compliance with NRC requirements and a semiannual review of the NARC audit program.

The Date When Full Compliance Will be Achieved

The NARC Charter will be revised and issued by April 1, 1980.