

APPENDIX A

Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, California 91770

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

Notice of Violation

Based on the results of an NRC inspection conducted on February 5-16, 1979, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Facility License No. DPR-13 and NRC Regulations as indicated below.

- A. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1976, Administrative Controls for Nuclear Power Plants.

Section 5.3 of ANSI N18.7-1976 requires that activities affecting safety shall be described by written procedures; and that these procedures shall include appropriate qualitative or quantitative acceptance criteria. Section 5.3 also recommends the general scope and content for procedures and has specific recommendations regarding the scope and content of certain procedure groups.

Contrary to the above:

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 I.B, did not incorporate the requirements and recommendations of ANSI N18.7-1976.
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 10 CFR 50.55a(g) and the licensee's identified program for inservice testing of pumps and valves.
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.

This is an infraction.

8003280438

- B. Technical Specification 6.5.2.8 requires that facility activities shall be audited under the cognizance of the Nuclear Audit and Review Committee (NARC) and that these audits shall include 1) the performance training and qualifications of the entire facility staff annually, and 2) the conformance of facility operations to all provisions contained in the TS and applicable license conditions annually.

Contrary to the above, 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.

This is an infraction.

- C. Title 10, Chapter 1, Code of Federal Regulations, Part 50, Appendix B, Criterion XVI states, in part: "... The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

Final Safety Analysis Report, Appendix D, Quality Assurance Program Plan, described the licensee's Quality Assurance Program for implementing requirements of 10CFR50, Appendix B. Section D.16 stated, in part: "Corrective actions are instituted to assure that conditions adverse to quality are promptly identified," and, "This identification occurs as a result of examination, tests and inspections, including reviews and audits that are conducted by the Quality Assurance Organization."

Quality Assurance Manual, Appendix A, Section 12.0 stated, in part: "Conditions adverse to maintaining the capability of the fire protection package to perform its intended function shall be identified, documented and corrected in accordance with the provisions of Chapter 16 of the Manual and its Amendment." Chapter 16, paragraph 16.1.4 stated, in part: "The Corrective Action Request ... shall be used for documenting conditions adverse to quality discovered by SCE personnel at the station, ..."

Contrary to the above, 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.

This item is a deficiency.

- D. Technical Specification 6.4.1 states in part: "A retraining and replacement training program for the facility staff shall be maintained ... and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 ..."

Section 5.5 of ANSI 18.1-1971 states, in part: "A training program shall be established which maintains the proficiency of the operating organization through periodic training exercises, instruction periods,

and reviews covering those items and equipment which relate to safe operation of the facility ..." Section 3.2 of ANSI 18.1-1971 states, in part: "The operating organization of a nuclear power plant consists of onsite personnel concerned with the day to day operations, maintenance, and certain technical services."

Contrary to the above, 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.

This item is a deficiency.

- E. Technical Specification (TS) 6.5.1.6.a requires that the On-Site Review Committee (OSRC) shall be responsible for reviewing all procedures required by TS 6.8 and changes thereto. TS 6.5.1.7.b requires that OSRC shall render determinations in writing to the Plant Manager with regard to whether or not the items reviewed under TS 6.5.1.6.a constitute an unreviewed safety question.

Contrary to the above, 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.

This item is a deficiency.

- F. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Appendix "A" of USNRC Regulatory Guide 1.33, Revision 1, Quality Assurance Program Requirements (Operation).

Appendix A of USNRC Regulatory Guide 1.33, Revision 1, Section 9.6 recommends that preventive maintenance schedules should be developed for inspection of equipment, replacement of such items as filters, and strainers, and inspection or replacement of parts that have a specific lifetime, such as wear rings.

Contrary to the above, 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.

This item is a deficiency.

- G. Technical Specification 6.8.1 states, in part: "Written procedures and administrative policies shall be ... implemented ... that meet or exceed the requirements and recommendations of ... Paragraph 2.2.1 of Fire Protection Program Review, BTP APCSB 9.5-1 ..."

Paragraph 2.2.1 of BTP APCS 9.5-1 states, in part: "The administrative procedures used to formally implement the Fire Protection Program are as follows: Division Order D-A-13, Fire Protection Program ... Station Order S-A-2, Fire Protection ..."

Division Order D-A-13 states, in part: "This Division Order outlines procedures to be used by generating stations for fire protection, ..."  
Paragraph I.C. states in part: "Demonstrations in hose handling, extinguisher operation and fire fighting shall be held on Company property at least once each year. The fire fighting demonstration should include an approved flame simulation of an oil fire. The simulation is necessary to minimize the demonstration's environmental impact, and prior approval by the local Air Pollution Control District is required."

Station Order S-A-2, Revision 17, paragraph IV B states, in part: "Monthly meetings shall be held for training purposes. The training will include fire fighting with portable fire extinguishers, the use of hose lines, ventilation of buildings, salvage operations, rescue operations, and the special aspects of fighting fires in controlled areas."

Contrary to the above, 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.

This item is a deficiency.