

Southern California Edison Company



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L. T. PAPAY
VICE PRESIDENT

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May 13, 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:

DOCKET No. 50-206
SAN ONOFRE - UNIT 1

Your letter of April 21, 1980 forwarded us a Notice of Violation concerning certain of our activities related to the March 10, 1980 loss of salt water cooling incident at San Onofre Nuclear Generating Station Unit 1. The enclosure to this letter provides our response to the Notice.

Should you have any questions, or if we can provide additional information, please let me know.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'L. T. Papay'.

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ENCLOSURE

The following provides the SCE response to the Notice of Violation described in Appendix A of NRC letter to SCE dated April 21, 1980 regarding the March 10, 1980 loss of salt water cooling pump incident at San Onofre Unit 1.

ITEM A: Technical Specification 3.3.1A.(1)h states that the reactor shall not be maintained critical unless two salt water cooling pumps are operable, or one salt water cooling pump and the auxiliary salt water cooling pump are operable.

Technical Specification 3.3.1B(6) states that during critical operation, maintenance shall be allowed on one of the two required salt water cooling pumps or auxiliary salt water cooling pump for a period of time not longer than 72 consecutive hours.

Contrary to the above, on March 10, 1980, from 9:25 PM to 9:56 PM, the reactor was operated at or near 100% of rated power with the two salt water cooling pumps and the auxiliary salt water cooling pump inoperable. Also from 9:56 PM on March 10, 1980, to 12:05 AM on March 11, 1980, the reactor was operated at or near 100% of rated power with both salt water cooling pumps inoperable.

Response: 1. Corrective Action Taken and Result Achieved.

- a. Regarding Technical Specification 3.3.1A.(1)h, the requirements of this specification are implemented by Emergency Operating Instruction S-3-5.34. This instruction was revised effective April 4, 1980 to incorporate the following changes:
 - (1) Reference to the auxiliary salt water cooling pump was deleted from the immediate operator action steps and this pump is no longer being considered in determining the operability of the safety injection system.
 - (2) Emphasis was placed on directing the operator to commence an immediate orderly shutdown of the Unit in the event both the north and south salt water pumps are determined to be inoperable.
 - (3) Reference was made in the immediate operator action steps to Emergency Operating Instruction S-3-5.19, "Loss of Component Cooling Water System", in the event that loss of the salt water cooling pumps results in loss of cooling capability of the component cooling water system. This instruction in turn requires that the reactor be tripped in the event that component cooling water is lost and cannot be restored.

Response (Cont'd)

- b. Regarding Technical Specification 3.3.1B(6), Emergency Operating Instruction S-3-5.34 again applies. This instruction was further revised effective April 4, 1980 to allow maintenance on only one of the two required salt water pumps for a period of time not longer than 72 hours during critical operation, irrespective of the operable status of the auxiliary salt water pump. It is noted that since credit is not being taken for auxiliary salt water pump in determining safety injection system operability, it is considered that critical operation of the reactor is in effect not limited under the Technical Specifications by maintenance on, or inoperability of, the auxiliary salt water pump.
- c. Effective April 4, 1980, Station Order S-0-100, "Station Operations", was revised to include direction to control room operators to take immediate steps to shut down the reactor in accordance with the appropriate Emergency Operating Instructions in the event that a limiting condition for reactor operation as specified by the Technical Specifications is exceeded.
- d. Effective April 4, 1980, training was conducted for all licensed operators on shift on the changes to Emergency Operating Instruction S-3-5.34 and Station Order S-0-100, with emphasis on the future interpretation and application of Technical Specifications 3.3.1A(1)h and 3.3.1.B.(6), and on the need to abide by Technical Specification action statements when limiting conditions for operation are exceeded.

2. Corrective Action to be Taken to Avoid Further Non-compliance

The actions described above provide assurance that further non-compliance with Technical Specification 3.3.1.A.(1)h and 3.3.1.B.(6) will be avoided. To provide assurance that all Technical Specifications governed by LCO's are properly interpreted and that corresponding time constraints are clearly specified as appropriate for those actions to be taken when LCO's are exceeded, the following additional corrective actions are being taken:

Response (Cont'd)

- a. Limiting conditions for operation as defined in the San Onofre Unit 1 Technical Specifications are being reviewed and all emergency operating instructions are being revised as necessary to clearly specify time constraints during which required actions must be taken.
- b. The system employed in the generation and revision of emergency operating instructions is being revised to provide for independent review by SCE's Nuclear Engineering and Licensing Organization of all such instructions.

The above actions will be completed by the completion of the current refueling outage.

3. Date When Full Compliance Will be Achieved

The corrective actions described above will serve to assure full compliance with Technical Specifications 3.3.1.A(1)h and 3.3.1.B(6). Actions described in 1. above were completed as of April 4, 1980. Actions described in 2. above will be completed prior to return to power operation in June 1980 after completion of the current refueling outage.

ITEM B: Technical Specification 6.8.1 states, in part, that: "Written procedures 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 Contents for Nuclear Power Plants; Appendix "A" of USNRC Regulatory Guide 1.33, Rev. 1, Quality Assurance Program Requirements (Operation);...."

Emergency Operating Instruction S-3-5.34, Rev. 0, February 1, 1980, Section 3, states that if both salt water cooling pumps become inoperable and the auxiliary salt water cooling pump cooling is inadequate, trip the unit.

Contrary to the above requirements, while operating the reactor at or near 100% of rated power on March 10, 1980, the unit was not tripped when both salt water cooling pumps were inoperable and when the auxiliary salt water cooling pump was not providing any coolant flow to the system.

Response: 1. Corrective Action Taken and Results Achieved

Revisions were made to Station Order S-0-100, "Station Operations", effective April 4, 1980 to explicitly require that all station personnel follow applicable instructions. In particular, S-0-100 was revised to require operating personnel to adhere to Emergency Operating Instructions unless it is certain that to do so would place the plant in an obviously worse condition. Also, effective April 4, 1980, all licensed operators on-shift received training on the changes to S-0-100 and were counselled as to the importance to plant safety of following Emergency Operating Instructions.

As stated in response 1.a. to Item A above, Emergency Operating Instruction S-3-5.34 was revised effective April 4, 1980 to reflect the interpretation of the applicable Technical Specifications to be applied thereafter. All licensed operators on shift received training on these revisions to S-3-5.34 on April 4, 1980

2. Corrective Actions Taken to Avoid Further Non-Compliance

The actions described above, in concert with those described in response to Item A above, provide assurance that further non-compliance with the requirements of Technical Specification 6.8.1 pertaining to following Emergency Operating Instructions will be avoided.

To provide additional assurance that all emergency operating instructions are properly established, implemented, and maintained, all such instructions will be reviewed for accuracy and revised as needed prior to the completion of the current refueling outage. This review will include independent review by the SCE Nuclear Engineering and Licensing Organization.

3. Data When Full Compliance will be Achieved

The revisions to S-0-100 and S-3-5.34 described above and the accompanying operator training serve to assure full compliance with Technical Specification 6.8.1 vis-a-vis S-3.5.34. As stated above, these corrective actions were completed on April 4, 1980.

The review of all emergency operating instructions for accuracy and revision as needed to assure compliance with Technical Specification 6.8.1 will be completed prior to a return to power operation in June 1980 after completion of the current refueling outage.