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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1990 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

Docket No. 50-206

SEP 3 1980

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

Attention: Dr. L. T. Papay, Vice President
Advanced Engineering

Gentlemen:

Subject: NRC Inspections - SONGS Unit 1

This refers to the inspection conducted by Messrs. J. R. Curtis and F. A. Wenslawski of the NRC Region V office on July 8, 9 and 10, 1980 of activities authorized by NRC License No. DPR-13, and to the discussion of our findings held by Mr. Curtis with Messrs. E. Morgan, R. Brunet and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violations, enclosed herewith as Appendix A. These items of non-compliance have been categorized into a level as described in our correspondence to all NRC licensees dated December 31, 1974.

This notice is sent to you pursuant to the provisions of Section 2.201, of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

The findings of this inspection and other recent inspections of the radiation protection program at the San Onofre Nuclear Generating Station Unit 1 indicate weaknesses in the radiation protection program and limitations on its ability to operate effectively during major outage conditions. The findings of other inspections to which we refer were forwarded to you by letters dated May 23, 1980, June 11, 1980 and August 15, 1980.

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Our August 15, 1980 letter transmitted the results of our comprehensive Health Physics appraisal at your facility. One of the significant findings of that appraisal was that "the present level of staffing in the Chemistry and Radiation Protection Group at the technician, first line supervisor and professional level is not sufficient to...assure continued radiation protection program quality in the event of the loss or absence of personnel, and to permit adequate performance under nonroutine and possibly during routine operations." Weaknesses in your radiation protection program evidenced during your refueling/steam generator outage included repeated failure to follow certain established radiation protection procedures; instances of poor job planning; weak radiation protection training; inadequate radiation protection supplies (particularly lower range self-reading pocket dosimeters); breakdowns in your internal supply system in receiving film dosimetry; delays in entering official exposure data into your computerized dosimetry control system and inadequacies in exposure data evaluation that culminated in an exposure in excess of regulatory limits.

In our view, the items of noncompliance in Appendix A and other radiation protection problems experienced during the outage raise serious concerns about the capability of the radiation protection program to function adequately during a major outage. Therefore, we request in addition to your specific replies to the items identified in Appendix A, your comments on the concerns expressed in this letter. We particularly would like a description of any actions you have taken or plan to take to improve the effectiveness of your radiation protection program during major outage conditions. The results of your efforts to assure future compliance with NRC regulations, in particular adherence to radiation exposure limits will be discussed in a meeting with you and your staff on September 5, 1980 and examined by our continuing inspection program. Your response to this letter and results of these inspections will be considered by this office in determining whether elevated enforcement actions must be taken by this office to assure compliance.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you believe to be proprietary, it is necessary that you submit a written application to this office, within (20) days of the date of this letter, requesting that such information be withheld from public disclosure. The application must include a full statement of the reasons why it is claimed that the information is proprietary. The application should be prepared so that any proprietary information identified is contained in an enclosure to the application since the application without the enclosure will also be placed in the Public Document Room. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

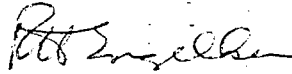
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Dr. L. T. Papay

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Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely,



R. H. Engelken
Director

Enclosures:

- A. Notice of Violation
- B. IE Inspection Report
No. 50-206/80-22

cc w/o enclosure B:

R. Dietch, Vice President, Nuclear Engineering & Operations
J. M. Curran, San Clemente