



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PDR

JAN 23 1981

Docket No. 50-206
EA 81-10

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:

The apparent items of noncompliance listed in Appendix A to this letter were identified during our September 22-26 and October 14-17, 1980 inspection of the Radiation Protection Program at San Onofre Nuclear Generating Station Unit 1. These apparent items of noncompliance are the latest in a continuing series of problems and inadequacies associated with your radiation protection program in the last nine months. Since April 1980 you have been cited for repeated failure to follow radiation protection procedures, failure to perform surveys, failure to limit a worker's exposure to 3 rem in a calendar quarter, failure to post radiation areas, and failure to label containers of radioactive materials.

On September 5, 1980, the Director of our Region V office met with your management to discuss our concerns about the radiation protection program at San Onofre Unit 1. At the time of that meeting your staff was evaluating an apparent series of radiation exposures associated with steam generator repair, the potential for which had been previously pointed out to your management by one of our inspectors. During that meeting you were informed that the over-exposures would likely result in a civil penalty.

Shortly after the September 5, 1980 meeting, we became aware of an additional occurrence that had substantial potential for personnel exposure in excess of regulatory limits. This occurrence involved work on a spent fuel shipping cask. Your evaluation of that situation concluded that although a high hand exposure had occurred, there were otherwise no particular problems. Our inspector's evaluation of that occurrence concluded that significant radiation protection inadequacies did in fact exist.

The nature of the apparent violations set forth in Appendix A to this letter and other related inspection findings involving radiation protection brought to your attention by letters dated May 23, 1980, May 28, 1980, June 11, 1980, August 15, 1980, August 20, 1980, September 3, 1980 and September 30, 1980 indicate the need for your organization to improve the radiation protection program, especially during major plant outage conditions. With specific regard to the violations identified in Appendix A to this letter, the events of the

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radiation overexposures and the work on the shipping cask indicate a need to substantially improve your ability to fully evaluate radiological hazards and to implement appropriate precautions. As you are aware, our review of your preparations for steam generator decontamination and tube sleeving raised similar concerns and the steam generator repair preparations were specifically discussed with you by our Region V office during the September 5, 1980 management meeting.

In addition, we are concerned about your ability to insure employees' adherence to approved radiation protection procedures. Our letters to you dated May 23, 1980, June 11, 1980, August 20, 1980 and September 3, 1980 each identified instances of failure to follow procedures. Appendix A to this letter again identifies such instances. It is apparent that corrective actions taken to date have not been effective.

Your letter dated September 30, 1980 to our Region V office delineated specific actions being taken by you to improve the Radiation Protection Program at San Onofre. We believe that the actions outlined in your letter represent a positive step toward long range improvement in your program. We remain concerned, however, with the apparent lack of depth or understanding demonstrated in the evaluation of radiological hazards associated with various maintenance activities and with employees' apparent disregard for established and approved procedures. It is the NRC's expectation that all licensees will pay meticulous attention to detail and strive to achieve a high standard of compliance. Your performance concerning the radiation overexposures that occurred inside the steam generators, the inadequate evaluations of hazards and the lack of adequate radiological surveys associated with work on the spent fuel shipping cask do not meet NRC requirements for radiological safety.

In view of the serious nature of the violations for which civil penalties are proposed and in view of the enforcement history related to your radiation protection program over the course of the last nine months, the new interim enforcement criteria (45 F.R. 66754, October 7, 1980), are being applied for these violations.

We consider the first event involving the overexposure of employees to be particularly egregious because: (1) a large number of employees were involved; (2) the situation existed for a long period of time and might have continued for a considerably longer period of time if it had not been discovered by an NRC inspector; (3) the event was readily preventable; (4) the enforcement history referred to above with regard to health physics violations; and (5) you have calculated that 42 individuals received total occupational doses to the whole body in excess of 3 rem in the second calendar quarter. In view of these problems, and to emphasize the importance of improving the performance of your radiation protection program and complying with NRC requirements, we are proposing a civil penalty of \$100,000 for the event involving the overexposures.

In view of this enforcement action for the 24 overexposures during the third quarter, enforcement action is not being taken for the 42 overexposures in the second quarter.

With regard to the second event involving the handling of the spent fuel cask, given the above-mentioned history, you should have been alerted that improvements were necessary in your radiation monitoring program at a much earlier date. Therefore, the civil penalty for this event has been increased by 25% pursuant to the interim enforcement criteria.


This results in the proposed imposition of civil penalties in the cumulative amount of one hundred fifty thousand dollars (\$150,000) for the items of noncompliance identified in Appendix A. Appendix B to this letter is the Notice of Proposed Imposition of Civil Penalties.

You are required to respond to this letter, and in preparing your response you should follow the instructions in Appendices A and B. In addition to your specific replies to the items identified in Appendix A you should also include a description of what measures you will take to assure that: (1) personnel assigned to evaluate radiological hazards are knowledgeable and capable, (2) hazards are fully evaluated and the appropriate precautions are taken, (3) an appropriate level of management oversight is being exercised to assure a meticulous attention to detail in the performance of (1) and (2) above, and (4) all personnel are aware of and will adhere to radiation protection procedures.

Your written reply to this letter and Notice of Violation and findings of our continuing inspections of your licensed activities will be considered in determining whether further enforcement actions such as additional civil penalties or orders to suspend, modify or revoke the license may be required to assure future 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 its enclosures will be placed in the Nuclear Regulatory Commission's Public Document Room.

Sincerely,



Victor Stello, Jr., Director
Office of Inspection and Enforcement

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Proposed
Imposition of Civil Penalties

cc w/enclosures:
J. M. Curran