Southern California Edison Company

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L. T. PAPAY
VICE PRESIDENT

TELEPHONE
213-572-1474

February 12, 1981

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

Attention: Mr. R. H. Engelken, Director

DOCKET NO. 50-206
SAN ONOFRE UNIT 1

Dear Mr. Engelken:

In a letter from your office dated January 27, 1981, we were requested to respond to a Notice of Violation resulting from an inspection of San Onofre, Unit 1 which took place December 1-24, 1980. The attached enclosures provide our response.

In accordance with Section 2.790(d) of NRC "Rules of Practice" Part 2, Title 10, Code of Federal Regulation, you are requested to withhold the contents of the attached Enclosure II from public disclosure.

I trust the enclosures respond adequately to all aspects of the notice. Should you have any questions concerning the response, please contact me.

Subscribed on the 13th day of February, 1981 by

OFFICIAL SEAL
AGNES CRABTREE
NOTARY PUBLIC - CALIFORNIA
PRINCIPAL OFFICE IN
LOS ANGELES COUNTY
My Commission Exp. Aug. 27, 1982

L. T. Papay
Vice President
Southern California Edison Company

Subscribed and sworn to before me this 13th day of February, 1981.

Agnes Crabtree
Notary Public in and for the
County of Los Angeles, State of
California

cc: J. F. Miller

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ENCLOSURE 1
RESPONSE TO NOTICE OF VIOLATION

ITEM A

Technical Specification 6.8.1 states that written procedures shall be established that meet or exceed the requirements and recommendations of Appendix "A" of USNRC Regulatory Guide 1.33, Rev. 1, Quality Assurance Program Requirements (Operation). Among these recommendations is one for "Repair of PWR Steam Generator Tubes" (Paragraph 9C (1)). Technical Specification 6.8.2 requires that each procedure of 6.8.1 above and changes thereto shall be reviewed by the On Site Review Committee and approved by the Plant Manager, prior to implementation.

Contrary to these requirements, Procedure Change Notice No. 3 to SPE-307, "Procedure for Operation of One Revolution Cutter Tool," a procedure to intentionally perforate selected steam generator tubes, was implemented on December 6, 1980 without prior review by the On-Site Review Committee and approval by the Plant Manager. The procedure, which was new, had been attached to an existing, approved procedure SPE-307, "Sleeve Insertion, Expansion and Mandrel Removal Hands On", which described the procedures and methods for installing sleeves into the steam generators.

RESPONSE:

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED.

   Procedure Change Notice No. 3, entitled "Procedure for Operation of One Revolution Cutter Tool," to SPE-307, entitled "Sleeve Insertion, Expansion and Mandrel Removal Hands On", was initiated on December 6, 1980 upon signature of two Onsite Review Committee members.

   A review of the PCN by the entire Onsite Review Committee on December 12, 1980 revealed the potential for the change to alter the intent of the origional procedure, and approval was denied.

   The form on which procedure change notices are requested, SO(1)-446, was revised and re-issued on December 23, 1980. The revision added a check-off as a reminder to the committee members signing that a change may not be issued which alters the intent of the procedure.

ITEM A (Continued)

1. (Continued)

On January 7, 1981, a memorandum was circulated to all members and alternates of the Onsite Review Committee, reiterating the requirements for issuance and review of procedure revisions and/or procedure change notices and requesting each individual involved to review these requirements.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE.

No further action is intended. Procedure Change Notices which alter the intent of the origional procedure have not been a problem before or after the occurrence in question. This occurrence is considered to be an isolated incident, and existing administrative controls are sufficient to assure future compliance.

3. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED.

Insofar as this incident is concerned, San Onofre Unit 1 was in full compliance with applicable Technical Specifications and regulatory requirements as of December 12, 1980, when the Onsite Review Committee cancelled PCN No. 3 to SPE-307.