

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company  
San Onofre Nuclear Generating Station, Unit 1

Docket No. 50-206/80-35  
License DPR-13

As a result of the inspection conducted on December 1-24, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- 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.

This is a Severity Level 5 violation.

- B. See Attachment 1 to Enclosure 1 (2.790 Material).

Pursuant to the provisions of 10 CFR 2.201 the Southern California Edison Company is required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Under this authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

January 22, 1981  
Dated

B. H. Faulkenberry  
B. H. Faulkenberry, Chief  
Reactor Projects Section #2

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