

85.14

JUL 31 1985

Docket Nos. 50-206, 50-361, 50-362

Southern California Edison Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 92770

Attention: Mr. Kenneth P. Baskin, Vice President
Nuclear Engineering Safety and Licensing

Gentlemen:

This refers to the routine inspection conducted by Messrs. F. R. Huey, J. P. Stewart, A. D'Angelo, and J. E. Tatum of this office during the period of March 23 through May 21, 1985 of activities authorized by NRC License Nos. DPR-13, NPF-10 and NPF-15 and to the discussion of our findings held by the inspectors with Mr. H. B. Ray and other members of the Southern California Edison 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 inspectors.

Based on the results of this inspection, it appears that certain of your activities were not conducted in compliance with Nuclear Regulatory Commission requirements. The specific deficiencies are described in the Notices of Violation and Deviation included as Appendices A and B to this letter.

Your response to the Appendix A and B notices are to be submitted to the Nuclear Regulatory Commission as requested in the individual notices.

In addition to the issues in Appendix A and B, the unresolved item in paragraph 5 of this report merits your careful attention. It is our position that the requirements of Specification 3.6.1.1, Primary Containment Integrity, (as defined in Specification 1.7) apply to the (MSIV's) which are listed in Technical Specification Table 3.6-1 as containment isolation valves and form a part of the primary containment boundary. It is our understanding that you do not fully agree with this position, and that you also consider a containment isolation valve (including an MSIV) which is closed but energized to be operable in so far as containment isolation and integrity are concerned, and in regards to Specification 3.7.1.5. We request that you state your position on these issues in addition to the response requested by the enclosed notices, so we may further evaluate this unresolved item.

8508200658 850731
PDR ADOCK 05000206
Q PDR

IEO

JUL 31 1985

In accordance with 10 CFR 2.790(a), a copy of this letter, the enclosures, and your responses thereto will be placed in the NRC Public Document Room.

The responses directed/requested by this letter and the accompanying Notices are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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

Sincerely,

D. F. Kirsch, Acting Director
Division of Reactor Safety
and Projects

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Deviation
3. Inspection Report:
Nos. 50-206/85-14
50-361/85-13
50-362/85-12

cc w/enclosures:

D. J. Fogarty, Executive Vice President
H. B. Ray, Vice President (San Clemente)
H. E. Morgan, Station Manager (San Clemente)
State of California

bcc w/enclosures:

Mr. Martin
Resident Inspector
RSB/Document Control Desk (RIDS)

bcc w/o enclosures:

LFMB
Greg Cook

RV/dot

PPW for STEWART D'ANGELO TATUM P. JOHNSON CHAFFEE A. JOHNSON KIRSCH AXELRAD

7/30/85 7/30/86 7/30/85 7/30/85 7/30/85 7/30/85 7/30/85 7/30/85 7/30/85 7/30/85