

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Units 2 and 3

Docket Nos. 50-361/50-362
License Nos. NPF-10/NPF-15

As a result of the inspection conducted during the period March 23 through May 21, 1985, certain violations of NRC requirements were identified. In accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2 Appendix C, as revised, 49 FR 8583 (March 8, 1984), the violations are set forth below:

A. Paragraph 4.7.1.2.1 of the Unit 3 Technical Specifications states, in part:

"Each auxiliary feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days by:

4. Verifying that the AFW piping is full of water by venting the accessible discharge piping high point vents."

This requirement is applicable in Modes 1, 2, and 3.

Contrary to this requirement, the accessible AFW discharge piping high point vents were not vented during the months of November and December 1984 and January 1985. Unit 3 was in mode 1, 2, or 3 throughout this period.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 3.

B. Paragraph 4.8.2.1 of the Unit 2 Technical Specifications states, in part:

"Each 125-volt battery bank and charger shall be demonstrated OPERABLE:

d. At least once per 18 months, during shutdown, by verifying that the battery capacity is adequate to supply and maintain in OPERABLE status all of the actual or simulated emergency loads for the design duty cycle when the battery is subjected to a battery service test."

Contrary to the above requirement, the 18 month surveillance to verify battery capacity was not accomplished on Unit 2 batteries 2B007 and 2B008 from the time the batteries were placed into service (February 1982) until December 1984 and February 1985, respectively.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 2.

8508200670 850731
PDR ADDCK 05000206
G PDR

C. Paragraph 6.8.1 of the Unit 2 and 3 Technical Specifications states, in part:

"Written procedures shall be established, implemented and maintained covering the activities referenced below:

c. Surveillance and test activities of safety related equipment."

Paragraph 6.1.1 of Procedure S023-3-3.16, "Auxiliary Feedwater System Monthly Tests," issued pursuant to Specification 6.8.1, requires a trip test of the steam driven auxiliary feedwater pump in order to ensure pump operability.

Contrary to the above requirements:

1. A trip test of the Unit 3 steam driven auxiliary feedwater pump was not conducted during the months of November and December 1984 and January 1985. During this period Unit 3 was in Modes 1, 2, and 3.

This is a Severity Level V Violation (Supplement I) applicable to Unit 3.

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in response to violation C including: (1) the corrective steps which have been taken 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. Consideration may be given to extending the response time for good cause shown.

Prior to the conclusion of the inspection, our inspectors verified that appropriate corrective actions had been defined and implemented for Violations A and B. Consequently, these violations need not be addressed in your response.

JUL 31 1985

Dated

P. H. Johnson for

P. H. Johnson, Chief
Reactor Projects Section 3