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VICE PRESIDENT

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September 3, 1985

U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. J. B. Martin, Regional Administrator

Dear Sir:

Subject: Docket No. 50-206
IE Inspection Report 50-206/85-20
Response to Notice of Violation
San Onofre Nuclear Generating Station, Unit 1

Mr. D. F. Kirsch's letter of August 6, 1985, issued IE Inspection Report 50-206/85-20 and forwarded a Notice of Violation resulting from the routine inspection conducted between May 22 and July 26, 1985. The enclosure to this letter provides our response to the Notice of Violation, as requested.

Southern California Edison (SCE) respectfully requests your reevaluation of the level of the cited violation. As discussed in the attached enclosure, separate individuals performed the valve manipulation and verification, respectively, at the time of the surveillance. It is SCE's position that this satisfies the intent of regulatory requirements for dual verification of valve position, notwithstanding that our procedure on verification was not performed in a timely manner. We believe that the untimely implementation of the more conservative requirements of our procedure constitute a Level V violation; not a Level IV violation as cited.

If you require any additional information, please so advise.

Sincerely,

Kenneth P. Baskin

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Enclosure

cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 & 3)

ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. D. F. Kirsch's letter of August 6, 1985.

Appendix A to Mr. D. F. Kirsch's letter states:

"Technical Specification 6.8.1 requires, in part, that:

'Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of ANSI N18.7-1976, Administrative Controls for Nuclear Power Plants; Appendix "A" of USNRC Regulatory Guide 1.33, Rev. 1, Quality Assurance Program Requirements (Operation). . . .'

"Paragraph 8.b of Regulatory Guide 1.33, Revision 1, states in part that '...implementing procedures are required for each surveillance test... listed in the technical specifications.'

"Paragraph 5.3 of ANSI Standard N18.7-1976 states, in part that:

'Activities affecting safety at nuclear power plants shall be described by written procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions and procedures.'

"San Onofre Nuclear Generating Station Surveillance Procedure SO1-12.3-2, Hot Operational Test of the Safety Injection and Containment Spray Systems, provides detailed instructions for performing Technical Specification required operability tests on the safety injection and refueling water pumps. Section 2.5.8 of this test procedure requires independent verification that the north refueling water pump discharge valve (CRS-306) is locked open before isolating the south refueling water pump by shutting its discharge valve (CRS-307).

"Contrary to the above requirements on June 10, 1985, Unit 1 operations personnel performing this surveillance test did not perform independent verification that valve CRS-306 was locked open prior to shutting valve CRS-307.

"This is a Severity Level IV Violation (Supplement I) applicable to Unit 1."

RESPONSE

INTRODUCTION

SCE acknowledges that the independent verifier, who SCE considers the primary method for dual verification, did not perform his duties in a timely manner nor did procedures clearly delineate that the verifier's check should be completed prior to manipulating the other train. Contrary to administrative

ENCLOSURE (Continued)

procedures, the procedural step was not fully completed in the order specified in the test procedure. However, dual verification, mandated by regulatory requirements, were fully met as discussed below. Consequently, SCE believes that it is inappropriate to classify this as a Level IV item of noncompliance, and that it should be identified as Level V instead.

BACKGROUND

On June 10, 1985, with Unit 1 at 92% power, control operators performed the routine surveillance "Hot Operational Test of the Safety Injection and Containment Spray System" per Operating Procedure SO1-12.3-2 on the refueling water pumps. This test is required by Technical Specifications Surveillance Requirement 4.2.1.II.A. In accordance with the procedure, the first operator locked open the north refueling water pump discharge valve CRS-306 and initialed Section 2.5.8 of the procedure checklist as the "manipulator" of the valve.

A second operator, who accompanied the manipulator, physically observed this manipulation and observed the proper valve was manipulated and locked open. The second operator initialed as the "checker" of the proper valve position, next to the manipulator's initials.

Operating Instruction SO1-14-43, "Control of System Alignments," Section 6.3 states in part ". . . Independent Verification is vital to the safe operation of nuclear facilities, and is simply a recognition that even the best operators will make an occasional error; when the risks and consequences of such an error are extreme, a second check is required (IE Notice 84-51, Independent Verification). . . Manipulation and/or initial alignment of systems or components (this includes valves, breakers and switches) outside the Control Room that are important-to-safety shall be performed by two persons, a manipulator and a checker." Section 6.3.2 states "The manipulator and checker both shall normally initial in the first blank . . ."

SCE believes that the action taken by the two operators on June 10, 1985, is consistent with accepted industry practice and satisfies the intent of NRC regulatory guidance for independent verification contained in:

1. NUREG-0737, Item I.C.6, "Guidance on Procedures for Verifying Correct Performance of Operating Activities ," which states in part: "... (5) for the return-to-service of equipment important to safety, a second qualified operator should verify proper systems alignment unless functional testing can be performed without compromising plant safety, and can prove that all equipment, valves, and switches involved in the activity are correctly aligned..."

ENCLOSURE (Continued)

2. ANSI N18.7-1976/ANS-3.2, Section 5.2.6, "Equipment Control ," which states in part: "...The procedures shall require independent verifications, where appropriate, to ensure that necessary measures, such as tagging equipment, have been implemented correctly..."

"...When equipment is ready to be returned to service, operating personnel shall place the equipment in operation and verify and document its functional acceptability..."

3. IE Notice 84-51, "Independent Verification ," which states in part: "...Independent verification should be independent with respect to personnel, i.e., two appropriately qualified individuals, operating independently, should verify that equipment has been properly returned to service. Both verifications are to be implemented by procedure and documented by the initials or signature of the two individuals performing the alignment and verification..."

Utilities have acceptably implemented the above regulatory guidance by using either a manipulator and a checker or a manipulator and an independent verifier who is not in the company of the manipulator. Both methods have been accepted by the NRC, providing the checker performs a verification function, and not a record keeping role.

SCE procedures provide a system wherein three parties may be used (manipulator, checker and an independent verifier) as described in Procedure S01-14-43, Section 6.3.3, which states in part "... the Independent Verifier shall not be in the company of those persons who performed the manipulation and checking of the component..." When the Independent Verifier initials, the Note to Section 6.3.3 clearly states the intent to be "... This means that the person signing/initialing for Independent Verification will be certifying that he/she conducted the verification physically separate (emphasis added) from person(s) conducting the manipulation or initial check..."

The use of three individuals is more conservative than the regulatory guidance cited above requires. In the case of the June 10, 1985, manipulation regarding CRS-306, the checker satisfied the regulatory requirements for dual verification. Therefore, SCE believes that the appropriate level of citation is that for a procedural noncompliance which does not involve noncompliance with regulatory requirements.

Prior to this event, SCE had reviewed its independent verification program and had decided to delete the requirement for a checker. However, compliance with the regulatory requirements is fully achieved by the use of a manipulator and an independent verifier or by use of a manipulator and a checker, as in this case.

ENCLOSURE (Continued)

Corrective Steps Which Have Been Taken and the Results Achieved

Upon discovery of the delinquent third party verification, appropriate Operations personnel were counseled on the importance of prompt completion of the third party verification prior to manipulating the other train.

Procedure S01-12.3-2 "Hot Operational Test of the Safety Injection and Containment Spray Systems," has been revised to explicitly require the third verification to be completed for one train prior to manipulation of the remaining train.

Corrective Steps Which Will be Taken to Avoid Further Items of Noncompliance

Appropriate Site procedures and/or directives/orders for Units 1, 2 and 3 will be revised to include the requirement for the completion of the verification on one train, prior to removing from service the remaining train of important to safety systems or components.

Further, additional training on Independent Verification will be developed and conducted for personnel qualified and required to perform manipulation, alignment, installation, removal, restoration, assembly, etc., of important to safety systems or components.

Date When Full Compliance Will be Achieved

Compliance with NRC requirements was achieved on June 10, 1985, when the second operator performed and signed, as the checker, the dual verification of the correct position of the valve. Compliance with the SCE procedural requirements for a third verification check was completed approximately 8 hours later on June 10, 1985.

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