U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-206/87-17, 50-361/87-16 and 50-362/87-18

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

License Nos. DPR-13, NPF-10 and NPF-15

Licensee: Southern California Edison Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Facility Name: San Onofre Units 1, 2 and 3

Inspection at: San Onofre, San Clemente, California

Inspection Conducted: June 15 through July 2, 1987

Inspectors: J. F. Melfi, Reactor Inspector — Date Signed: 7/16/87

W. J. Wagner, Reactor Inspector — Date Signed: 7/16/87

Approved by: S. A. Richards, Chief, Engineering Section — Date Signed: 7/21/87

Summary:

Inspection During the Period of June 15 through July 2, 1987 (Report Nos. 50-206/87-17, 50-361/87-16 and 50-362/87-18)

Areas Inspected: Routine unannounced inspection by regional based inspectors of activities associated with implementation of the licensee's QA Program. NRC Inspection Procedures 30703 and 35701 were covered during this inspection.

Results: No violations or deviations were identified.

DETAILS

1. Persons Contacted

*D. Shone, Site QA Manager
*R. Reiss, QA Supervisor
*J. Harmon, QA Supervisor
*W. Lazear, QA Supervisor
*R. Plappert, Compliance Manager
*C. Couser, Compliance Engineer
*H. Newton, Manager Material Support
*R. Santosuosso, Assistant Maintenance Manager
S. Martorauo, QC Engineer
W. Kirby, QC Supervisor
R. Ruiz, QC Inspector
D. Tuttle, Engineer
C. Chiu, Assistant Technical Manager
R. Brown, QA Engineer
G. Johnson, QA Engineer
G. Whetton, Field Surveillance Lead
H. Revie, QA Engineer
M. Ramsey, QA Engineer

*Attended the Exit Meeting on June 19, 1987.

2. Quality Assurance (QA) Program Annual Review

a. QA Program Changes

The licensee's QA Program for operations is currently described in Amendment 9 of their Topical Report SCE-1-A "Quality Assurance Program." Two changes to SCE-1-A, Change Notice (CN) Nos. 16 and 18, were recently submitted to and approved by NRC:Region V in accordance with 10 CFR 50.54(a). CN No. 16 added requirements for control of "conditional use" of certain items prior to completion of the nonconformance disposition. CN No. 18 was added for clarification of the two calibration and control programs established for permanent plant equipment and measuring and test equipment. The inspector discussed these changes with licensee personnel and is satisfied that the significance of these changes and the manner in which they are to be implemented are understood.

The inspector reviewed changes to the following implementing procedures and found the changes to be in conformance with the approved QA Program described in Topical Report SCE-1-A:

QA Procedure No.	Title	Revision	Effective Date
N2.03	Stop Work Order	7	1/26/87
N2.13	QA Concerns Reporting to Upper Management	2	1/26/87

N2.19	Qualification of Quality Assurance Auditors	1	1/26/87
N4.06	QA Review of Procurement Documents	7	1/26/87
N12.01	Control of Measuring and Test Equipment Assigned to the Quality Assurance Organization	8	3/16/87
N16.06	Corrective Action Monitoring	4	1/2/87
N17.01	Quality Assurance Organization Review of Quality Assurance Records	14	5/2/86
N18.04	Quality Assurance Organization Audits - Scheduling, Planning, Performance, Documentation and Follow-up	32	6/5/87

Engineering and Construction Department Procedure E&C 40-9-17, Revision 6 of May 23, 1986, was also reviewed by the inspector. This procedure contains provisions for informing key licensee personnel of new and existing regulatory requirements. Procedural actions include processing of generic letters, IE Bulletins, regulatory guides, IE Information Notices and proposed NRC regulations.

In reviewing the management organization charts, the inspector noted that the organization was as specified in the Topical Report but was not consistent with the Technical Specifications. However, the licensee has made a Technical Specification submittal for NRC review and approval that describes the current organization.

b. QA Program Implementation

(1) Receipt, Storage and Handling of Equipment and Materials Program

The following implementing procedures were reviewed:

XI-3.0	Control and Use of Material Handling Equipment
XI-3.2	Storage of Quality-Affecting Items
XI-3.3	Packaging and Preservation Requirements for Storage and Shipment of Quality-Affecting Items
XI-3.4	Material Maintenance Program

XI-3.5	Handling and Storage of Hazardous Materials at the SONGS Mesa Storage Facilities
XI-3.6	Receiving of Material and Equipment by SONGS Warehouse
XI-3.7	Control of Items Sent Off Site
XV-5.0	Nonconforming Material, Parts and Components.
MSSONGS-W/I-561	Issue and Return of Material Stocked by the SONGS Material Management Organization.
QAP N10.02	Receiving Inspection
QAP N10.23	Inspection of Items in Storage

These procedures provide the licensee with the necessary administrative controls to assure that items received, stored and subsequently issued are in conformance with FSAR commitments. For receipt of safety-related items, this includes requirements for the following activities: conducting receipt inspections, identification of vendors allowed to supply material supported by a "quality certification," conformance with original procurement documents, inspection of damaged materials, and retention of receipt inspection activities. Controls also addressed disposition of items received such as tagging or marking for storage. Items may be conditionally released provided the required justification and authorization is obtained. Administrative controls covered both onsite and offsite storage to assure proper levels of storage, identification of items, access control, maintenance and care of items in storage including shelf life, periodic inspections, and assigned responsibilities for implementation of these storage controls. Procedures for routine and special handling of materials were included in this program reviewed by the inspector.

The inspector selected three items stored in the warehouse that were identified by receiving to be in nonconformance. The three items, identified as DDN No. 295A, 1556-86 and 1244-86, were properly marked and segregated in accordance with QA Program procedures. While in the receiving area, the inspector selected from the receiving record files four items that were recently received, and was able to verify that receipt inspections were conducted, items were properly dispositioned, and storage of the items were all in accordance with the procedural requirements. The items selected were identified as follows:

P.O. Number	Item Description
6C106007	Bronze Adjusting Packing Ring
6A027006	Johnston Stainless Steel Welding Rod
8A035901	Westinghouse Lubricant
8B094094	GE-Circuit Board

In order to determine if items stored in the warehouse are properly identified, the inspector singled out 5,000 pounds of weld rod, a 1/3 HP motor, and one valve bonnet assembly. In each instance, the item was tagged and marked to allow traceability to the purchase order, receipt records and quality certification documents.

(2) Audit Program

The inspector reviewed changes to the licensee's QA Program relating to the audits of Units 1, 2 and 3 activities to assure that the audit program was in conformance with the regulatory requirements, licensee's commitments and industry standards. The audit program was looked at previously in Inspection Report Nos. 50-206/86-05, 50-361/86-06 and 50-362/86-06; there have been no major program changes since this inspection report.

The Topical Quality Assurance Manual (TQAM) sets forth the policies and general requirements for establishing and implementing the licensee's QA Program. The scope of the audit program is defined in TQAM Chapter 1E, "Audits"; the audit program defined in this document is consistent with Section 6 of the Technical Specifications and Section 17 of the FSAR. Other QA procedures applicable to the audit program are contained in the Quality Assurance Organization Reference Procedure Manual (QAP). The following QAP procedures changes were reviewed by the inspector:

Procedure Number	Title	Revision Number	Effective Date
N18.04	Quality Assurance Organization Audits - Scheduling, Planning, Performance, Documentation and Follow-up	32	6/5/87
N2.19	Qualification of Quality Assurance Organization Auditors	0	6/19/87

The changes to the procedures were discussed with the licensee. The procedure changes to N18.04 were determined to be a reduction in the amount of words in the procedure that would be applicable to a plant during construction or startup. The

intent of the procedure was not changed. Procedure N2.19 superseded procedure N18.05. This new procedure was substantially the same, but with more specific criteria for determining the qualifications of auditors.

The following procedures mentioned in the previous inspection report were not changed:

Procedure Number	Title	Revision Number	Effective Date
N18.07	Participation of Technical Personnel from Other Departments on Audit Teams	3	5/6/85
N18.11	Independent Audits	2	6/19/85
N18.13	Technical Specification Audits by the Quality Assurance Organization	5	2/3/86

By reviewing the above QA Program Procedures N18.04 and N2.19, the inspector verified that the responsibilities were assigned in writing for overall management of the audit program including:

(a) Determining the adequacy of the qualifications of audit personnel.

(b) Ensuring corrective actions taken for deficiencies identified during audits.

(c) Determining the independence of audit personnel.

(d) Determining when reaudits are required.

(e) Issuance of audit reports to management.

(f) Periodic reviews of the audit program to determine its status and adequacy.

(g) Preparation of long-range audit plans.

The audit program also requires a response from the audited organization within 30 days. Preliminary findings are discussed with the audited organization during an exit interview. The audited organization has several days to provide additional information to any findings, before the findings are tracked by the licensee.

The following procedures used by the licensee to monitor conditions adverse to quality (in accordance with Criterion XVI of 10 CFR 50, Appendix B) were reviewed by the inspector:

Procedure Number	Title	Revision Number	Effective Date
N16.03	Instruction for Issuance and Control of Corrective Action Request (CAR)	23	6/5/87
N16.06	Corrective Action Monitoring	4	1/2/87

No problems with the corrective action monitoring were identified.

Distribution requirements for audit reports and corrective actions responses have been defined in the QAP. Checklists are used in the performance of all audits.

The licensee did an administrative change to the audit program. Previously, the QA/QC organizations were in charge of reviewing Section XI and in charge of tracking Nonconformance Reports (NCRs). The station technical is now in charge of tracking NCRs, and operation maintenance is in charge of reviewing Section XI. The QA organization is now doing more field investigations.

No violations or deviations were identified.

(3) Audit Program Implementation

The inspector examined the licensee's activities in the implementation of the audit program. The inspector examined completed site, technical specification, and vendor audits performed by the licensee. The purpose of this review was to determine if the licensee is using qualified personnel to conduct these audits and whether these audits are in conformance with regulatory requirements, licensee commitments, and industry guides and standards.

When the licensee identifies problems in the area audited, they will issue a Corrective Action Request (CAR) for procedural or programmatic problems, and a Problem Review Report (PRR) for other noted deficiencies. The amount of CARs outstanding has been approximately 30 for the past 2 quarters.

The implementation of the audit program was also looked at previously in Inspection Report Nos. 50-206/86-41, 50-361/86-30 and 50-361/86-19.

(a) Site Audits

The following site audits were reviewed by the inspector for completeness, and types of problems identified (PRRs or CARs):

Audit Number	Title	Problems Identified
SCES-024-86	"Environmental Qualification of Equip."	1 CAR, 1 PRR
SCES-069-86	"Identification and Control of Materials, Parts, and Components"	1 CAR, 3 PRRs
SCES-072-86	"Quality Planning (Instructions and Procedures)	1 CAR, 1 PRR
SCES-011-87	"Training and Personnel Qualifications"	2 CARs
SCES-016-87	"Audit of Compliance with NUREG-0737, Supplement 1"	3 PRRs
SCES-017-87	"Vendor/Supplier Data/ Control and Implementation of Monitoring Program"	None

The qualifications of the auditors were reviewed on a selected basis and found to be acceptable. The audits were performed in accordance with the controlling procedure and any problems identified were being tracked to completion.

(b) Technical Specification Audits

The Technical Specification audits are performed to determine the implementation of the plants Technical Specifications. These audits were looked at in the inspection report listed above. The inspector evaluated the pre-audit work in progress for several different Technical Specification audits. The pre-audit planning for these audits was found to be acceptable.

The inspector also reviewed several completed Technical Specification audits of safety systems. The following Technical Specification audits were reviewed by the inspector:

Audit No.	SONGS Unit	Technical Specifications	Problems Identified
SCES-036-86	1	4.1.6, 4.1.7, 4.1.12, 4.2.1, 4.2.2, 4.2.3, 4.3.1, 4.3.2	None
SCES-040-86	2,3	4.7.1 through 4.7.6, 4.7.10, 6.10.2.L	1 CAR, 3 PRRs

SCES-057-86	1	4.1.1.E, 4.1.1.F, 4.1.1.G, 4.8	None
SCES-007-87	1	4.1.9, 4.1.10, 4.11, 4.13	None

The qualifications of the auditors were reviewed. The audit was performed in accordance with the controlling procedure, and the audits received appropriate reviews.

The audit SCES-040-86, which was a review of plant systems for Units 2 and 3, identified a programmatic deficiency on a surveillance of a safety system. The deficiency was that no formal program exists to review operational data or visually inspect safety piping systems to determine the snubbers needing testing. The station is now doing a more formalized review of their snubber testing. The actions taken seem appropriate. The inspector inquired as to whether the acceptance criteria for hydraulic snubber lock-up velocity compensates for the affect of temperature at which the functional test is performed. By reviewing in-place test procedure PD 18393 and test results, the inspector was able to verify that the acceptance criteria satisfactory addressed temperature affects to assure desired maximum lock-up values at operating temperature.

(c) Vendor Audits

The licensee performs audits of vendors to assure that the vendor has an effective QA Program. If the licensee approves the vendors QA Program, the vendor is put on the approved supplier list.

The following vendor audits were reviewed by the inspector:

- TDI-1-86 "Transamerica Delaval, Inc."
- LMTA-1-86 "Limitorque Corporation"

The audits of these vendors were chosen by the inspector due to problems identified in the industry with respect to these vendors. The audits were done with qualified personnel in accordance with a preplanned audit of the vendors. No corrective action requests were identified in the audit of Limitorque, but five CARs were identified in the Transamerica Delaval audit.

The inspector was informed that the QA organization was not doing backshift work on a general basis. Backshift observations are being left to the QC organization. Since the majority of work is occurring on the day shift, and there is QC onsite during the backshift, this seems acceptable.

No violations or deviations were identified.

3. Exit Meeting

The inspectors met with licensee management representatives denoted in Paragraph 1 on June 19, 1987. The scope of the inspection and the inspectors' findings, as noted in this report, were discussed. At this meeting, the inspectors also requested additional information concerning snubber testing, and informed the licensee that this material would be reviewed in the region and the findings documented in this report.