

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company  
San Onofre Unit 1

Docket No. 50-206  
License No. DPR-13

During an NRC inspection conducted on April 4 through May 23, 1987, 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 (1987), the violations are listed below:

A. 10 CFR 50, Appendix B, Criterion V, states:

"Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

10 CFR 50, Appendix B, Criterion XII, states:

"Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

1. Chapter 1C of the licensee's Topical Quality Assurance Manual (TQAM) requires that quality affecting procedures include "appropriate qualitative and quantitative acceptance criteria, as applicable, to determine that designated activities are accomplished in a satisfactory manner."

Contrary to this requirement, on April 27, 1987, calibration procedure S01-II-1.6.3 did not include acceptance criteria (in that allowed deviation from desired readings was not specified) for the data recorded by paragraphs 6.2.19 and 6.3.14 of the procedure. These data were required as part of the calibration of the startup rate meters and neutron level meters associated with source range nuclear instrument channel NIS-1201.

2. Chapter 5C of the licensee's TQAM states, "Measuring and test equipment used in the performance of safety-related activities shall be appropriately calibrated and controlled..."

Contrary to this requirement, on May 23, 1987, procedures S01-II-1.6.3 (Calibration of Source Range Startup Rate Channel N-1201) and S01-II-1.6.6 (Calibration of Intermediate Range Startup Rate Channel N-1204) did not require calibration of a ramp generator used for calibration of rate circuits in these channels, nor was the output of the ramp generator verified using calibrated measuring and test equipment.

This is a Severity Level IV violation (Supplement I).

- B. Paragraph 6.8.1 of the Unit 1 Technical Specifications, by reference to Regulatory Guide 1.33, requires procedures to be established, implemented and maintained for maintenance activities.

Maintenance Procedure S0123-I-1.1, titled "Organization and Responsibilities of the Maintenance Section," requires activities to be accomplished in verbatim compliance with approved procedures (paragraph 6.2.3.5) and requires procedures to be revised if additional actions are required (other than minor corrective maintenance) beyond those allowed by written work procedures (paragraph 6.2.3.5.3).

Maintenance Procedure S0123-I-1.7, titled "Maintenance Order Preparation, Use and Scheduling," requires work to be done in verbatim compliance with approved procedures and documented instructions contained in the work packages (paragraphs 6.12.11 and 6.12.12) and requires that measuring and test equipment (M&TE) used during maintenance activities be recorded on applicable Maintenance Orders (paragraphs 6.12.7 and 6.12.19.5).

Maintenance Procedure S01-II-1.6.3, titled "Source Range Channel N-1201 Calibration", specifies the requirements for performing calibration of source range nuclear instrument channel N-1201. Specifically:

- (1) Paragraphs 6.1.15 and 6.2 require the use of a pulse counter during calibration of the discriminator and pulse log integrator circuits.
- (2) Paragraphs 6.3.12 and 6.3.13 require adjustment of the rod stop annunciator to alarm at 2.0 DPM.
- (3) Paragraphs 6.5.7 and 6.5.8 require calibration of Foxboro EMF converters NYV-2201 and NYI-2201.
- (4) Paragraph 3.2.1 identifies that the pulse generator, pulse counter and oscilloscope specified in paragraph 6.1.15 for calibration of the source range discriminator circuit are M&TE.

Contrary to the above, on January 17, 1987, during calibration of source range channel N-1201 per MO 87011045000/1, procedure S01-II-1.6.3 was not complied with in that:

- (1) A pulse counter was not used during calibration of the discriminator and pulse log integrator circuits.
- (2) Rod stop annunciator adjustments were not accomplished.
- (3) Calibrations of the Foxboro EMF converters NYV-2201 and NYI-2201 were not accomplished.
- (4) The pulse generator, pulse counter and oscilloscope were not recorded as M&TE on the Maintenance Order.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Senior Resident Inspector, San Onofre, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION



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A. E. Chaffee, Acting Chief  
Reactor Projects Branch

Dated at Walnut Creek, California  
this 24<sup>th</sup> day of July 1987