



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

AUG 29 1989

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

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

Attention: Mr. Harold B. Ray, Vice President
Nuclear Engineering, Safety, and Licensing Department

Gentlemen:

Subject: NRC INSPECTION OF SAN ONOFRE NUCLEAR GENERATING STATION
UNIT NOS. 1/2/3

This refers to the maintenance team inspection conducted by Mr. A. Toth and other members of our staff during June 26 through July 21, 1989. This inspection examined your activities as authorized by NRC License Nos. DPR-13, NPF-10, and NPF-15. Discussions of our findings were held with you and other members of your 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.

As evidenced by the attached Maintenance Inspection Tree, the maintenance process for San Onofre has been exceptionally well defined and incorporates many current industry initiatives recognized for their contribution to a successful maintenance program. It reflects management support and involvement, and a commitment to rising standards of performance.

As also indicated by the attached Maintenance Inspection Tree, while the implementation of the program appears satisfactory, several areas could be further strengthened. Consistent implementation of rigorous procedural controls by all involved plant staff remains to be demonstrated. Continued management initiatives and efforts appear warranted to improve compliance by all program implementing individuals.

Many of the observations of this inspection were supported by results of the San Onofre employee feedback and management overview programs. Continuation of noted management efforts to increase attention to such results also appears warranted.

By dealing vigorously with those areas which could be strengthened, you may be able to improve your SALP rating in the maintenance area to a Category 1.

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Inspection Overview

The purpose of this inspection was to determine the effectiveness of the total integrated maintenance process at the San Onofre Nuclear Generating Station, to assure that components, systems, and structures of the facilities are adequately maintained so that they are available to perform their intended functions. Specific inspection emphasis was focused on the following objectives:

1. Assess the effectiveness of the maintenance program to avoid challenges to safety systems from transients initiated or made more severe by equipment failures due to maintenance weaknesses.
2. Assess the effectiveness of quality verification organizations in contributing to the identification, solution, and prevention of safety significant technical problems and deficiencies in plant systems and operations.
3. Assess the effectiveness of problem identification and resolution processes, including awareness and actions regarding industry initiatives in equipment performance monitoring and preventive maintenance.
4. Assess the status of corrective actions for Self-Assessment efforts in the maintenance area.

Major Concerns Highlighted by this Inspection

As summarized below and discussed in detail in the attached report, the inspection identified several findings associated with the systems inspected. Underlying each of the findings is one or more of the following basic concerns:

1. Inadequate attention to detail in development of maintenance work plans, in the implementation of maintenance work instructions, and in root cause analyses and development of comprehensive corrective action plans.
2. Inability to resolve the long-standing weaknesses in control of equipment status (work clearances), including both the adequacy of the governing procedures and adherence to such procedures by plant staff.
3. Continued unidentified discrepancies between the plants and the configuration described in the Updated Final Safety Analysis Reports.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation and Notice of Deviation, enclosed herewith as Appendix A and Appendix B, respectively. Your response to these notices are to be submitted in accordance with the provisions of 10 CFR 2.201, as stated in the Notices.

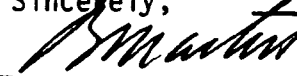
The findings related to equipment status control are particularly troublesome. The inability to resolve the long-standing problems in this area reflects poorly on your management systems. Please address your plan of action to resolve this situation in your response to this letter.

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

The responses directed by this letter and the attached Notice 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,



J. B. Martin
Regional Administrator

Enclosures:

1. Appendix A (Notice of Violations)
2. Appendix B (Notice of Deviations)
3. Inspection Report Nos. 50-206/89-16
50-361/89-16
50-362/89-16

cc w/enclosures:

D. J. Fogarty, SCE
C. B. McCarthy, Jr., SCE
H. E. Morgan, SCE (San Clemente)
State of CA

bcc w/enclosures:
 Project Inspector
 Resident Inspector
 C. Trammel, NRR/PD5
 A. Gody, NRR/LPQE
 T. Foley, NRR
 Region I
 Region II
 Region III
 Region IV
 J. Martin, RV
 B. Faulkenberry, RV
 G. Cook, RV
 A. Toth, RV
 J. Burdoin, RV
 C. Ramsey, RV
 K. Johnston, RV
 J. Russell, RV
 T. Dunning, NRR/OTSB
 D. Schultz, COMEX Corp.
 docket file

M. Virgilio, NRR
 B. Clayton, OEDO

bcc w/o enclosures:
 J. Zollicoffer
 M. Smith
 N. Western

REGION V/dot

A. Toth ^K 8 / 17 / 89	R. Huey ^K 8 / 12 / 89	D. Kirsch ^K 8 / 12 / 89	8 / / 89	8 / / 89
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P. Johnson 8 / 18 / 89	A. Johnson 8 / 17 / 89	A. Chaffee ^{all} 8 / 20 / 89	R. Zimmerman 8 / / 89	J. B. Martin 8 / / 89
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SEND TO PDR YES / NO
