

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
P. O. Box 800
Rosemead, California 91770

San Onofre Units 1 and 2
Docket Nos. 50-206, 50-361
License Nos. DPR-13, NPF-10

During an NRC inspection conducted during the period of June 26 through July 21, 1989, 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 (1988), the violations are listed below:

1. San Onofre Nuclear Generating Station (SONGS) Unit-1 Technical Specification 6.8.1 states, in part, that "Written procedures shall be established, implemented and maintained covering... surveillance and test activities of safety related equipment."

San Onofre approved plant procedures and S0123-II-9.37 established the post-maintenance testing and return to service requirements applicable to safety related air operated valves. These procedures required calibration of the valves and recording of associated data on "Instrument Calibration Data Card(s)". The procedures were invoked by the "Tests Required" section of maintenance order MO# 87102901000, for the safety related Unit-1 containment spray header isolation valve actuator S1-CRS-CV-82-ACT.

Contrary to the above, on February 25, 1988, Unit-1 personnel failed to perform the specified calibration and testing as required by maintenance order MO 87102901000.

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

2. SONGS Unit-2 Technical Specification 6.8.1 states, in part, that "Written procedures shall be established, implemented and maintained covering...the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978." Appendix A of Regulatory Guide 1.33, Section 1.c specifies administrative procedures for "Equipment Control (e.g., locking and tagging)".

Implementing SONGS procedures S0123-0-21 (TCN 1-4, dated May 25, 1989) and S0123-XV-10.0 (Revision 0, November 14, 1985) had been established for "Equipment Status Control". These safety related procedures were not implemented for the Unit-2 containment spray pump #1 Work Authorization Request (WAR) 2-8902448, as follows:

- a. Procedure S0123-0-21 states, in part, "6.5.1 A licensed operator or qualified person will prepare the WAR in accordance with applicable portions of WAR keypoints (Attachment 2)..."

Contrary to the above, on May 15, 1989, WAR 2-8902448 was not prepared and updated/maintained fully in accordance with the applicable portions of the WAR keypoints, as follows:

- #34 WAR 2-8902448 did not specify a "tailboard" briefing.
- #36 The date of release was not recorded for one of four releases.
- #37 "When" (more work required) was not recorded.
- #47 No record of date/time the tagout was completed.
- #48 The important-to-safety control room handswitch was not verified for the containment spray pump-1 motor control. Unused spaces were not crossed through with diagonal lines to prevent unauthorized add-ons.

- b. Procedure S0123-0-21 states, in part, "6.18.6 People that are working under the Work Authorization shall be notified prior to release of the Work Authorization by the Work Authorization holder."

"6.20.2 All Work Authorization holders affected by any tagging status changes shall notify all personnel working under their work authorization of the change."

Contrary to the above, on May 30, 1989, personnel working under WAR 2-8902448 were not notified prior to release of this WAR.

- c. Procedure S0123-XV-10.0, states, in part, "6.2.3 Foreman (or above) shall: .1 Review the SO(123) 1356 to ensure all entires are complete and job(s) is complete;..."

Contrary to the above, on May 30, 1989, on WAR 2-8902448, a foreman (or above) did not review the associated SO(123) 1356 prior to release of the equipment for use (testing).

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

3. 10 CFR 50, Appendix B, Criterion 16 requires, in part, "In the case of significant conditions adverse to quality, (the) measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition ... and the corrective action taken shall be documented and reported to appropriate levels of management."

Contrary to the above, San Onofre Unit-1 Nonconformance Report NCR S01-P-7294, dated June 28, 1989, did not establish the cause of identified inadequate thread engagement on fasteners on the Unit-1 east safety injection pump.

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

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement of 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



J. B. Martin
Regional Administrator, Region V

Dated at Walnut Creek, California
this 29 day of August, 1989