

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-206/91-33, 50-361/91-33, and 50-362/91-33

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

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

Licensee: Southern California Edison Company  
Irvine Operations Center  
23 Parker Street  
Irvine, California 92718

Facility Name: San Onofre Units 1, 2, and 3

Meeting at: San Onofre, San Clemente, California

Report Prepared By: *K. E. Johnston* 11-1-91  
K. E. Johnston, Project Inspector Date Signed

Approved By: *P. H. Johnson* 11/1/91  
P. H. Johnson, Chief Date Signed  
Reactor Projects Section 3

Meeting on October 16, 1991 (Report Nos. 50-206/91-33, 50-361/91-33, 50-362/91-33)

Scope: Management meeting to review the NRC Systematic Assessment of Licensee Performance (SALP) report for the period from February 1, 1990 through July 31, 1991 and to discuss other pertinent issues.

## DETAILS

### 1. Meeting Attendees

#### a. Licensee Attendees

H. B. Ray, Senior Vice President, Nuclear  
H. E. Morgan, Vice President and Site Manager  
R. W. Krieger, Station Manager  
R. M. Rosenblum, Manager of Nuclear Regulatory Affairs  
J. T. Reilly, Manager of Nuclear Engineering and Construction  
B. Katz, Manager of Nuclear Oversight  
R. W. Waldo, Operations Manager  
M. P. Short, Technical Manager  
L. O. Cash, Maintenance Manager  
P. J. Knapp, Health Physics Manager  
W. G. Zintl, Site Emergency Preparedness Manager  
J. L. Reeder, Nuclear Training Manager  
H. W. Newton, Site Support Services Manager  
M. A. Wharton, Manager, Nuclear Engineering Design Organization  
M. J. Speer, Security Manager  
R. D. Plappert, Technical Support and Compliance  
W. C. Marsh, Assistant Operations Manager  
J. L. Rainsberry, Units 2 and 3 Licensing Manager  
L. D. Brevig, Onsite Nuclear Licensing Supervisor  
J. J. Jamerson, Onsite Nuclear Licensing Lead Engineer  
D. A. Werntz, Onsite Nuclear Licensing Engineer  
J. Sutton, Onsite Nuclear Licensing Engineer  
F. Briggs, Station Technical Supervising Engineer  
O. E. Flores, Chemistry Engineering Supervisor  
R. Sandstrom, Operations Training Supervisor  
D. M. Barron, Corporate Communication Representative  
R. O. Lacy, Manager, Nuclear, San Diego Gas and Electric

#### b. NRC Attendees

J. B. Martin, Regional Administrator  
R. P. Zimmerman, Director, Division of Reactor Safety and Projects  
T. R. Quay, Director, NRR Project Directorate V  
F. A. Wenslawski, Deputy Director, Division of Radiation Safety and Safeguards  
D. F. Kirsch, Chief, Reactor Safety Branch  
P. H. Johnson, Chief, Reactor Projects Section 3  
C. W. Caldwell, Senior Resident Inspector, San Onofre  
L. E. Kokajko, Units 2/3 NRR Project Manager  
A. L. Hon, Resident Inspector, San Onofre  
C. D. Townsend, Resident Inspector, San Onofre  
K. E. Johnston, Project Inspector  
G. N. Cook, Senior Public Affairs Officer

#### c. Others

G. Edwards, City of Anaheim  
A. Horan, Orange County Register

## 2. Meeting Minutes

Mr. Martin opened the meeting by noting that the meeting provided an opportunity for an open discussion of the NRC Systematic Assessment of Licensee Performance (SALP) report. Mr. Martin characterized the licensee's performance as quite good in some areas with other areas requiring additional attention. Mr. Ray stated that his staff had given the SALP report thoughtful consideration and that the assessment was similar to their own.

Mr. Johnson summarized the Board's assessment and recommendations in the following functional areas:

- Plant Operations
- Maintenance/Surveillance
- Engineering/Technical Support
- Safety Assessment/Quality Verification

The licensee provided the following comments after the discussion of each of the functional areas:

### Operations

Mr. Waldo agreed with the assessment and noted that efforts were continuing to address areas of weakness. Mr. Morgan recognized that the recommendation for continued attention to proper application of Technical Specification requirements was directed toward management and would be addressed.

### Maintenance

Mr. Cash observed that the assessment presented in the SALP was fair and accurate and that initiatives to strengthen the work process, training, and the implementation of the maintenance program had been initiated. He stated that in the area of work process and procedures, the following initiatives were underway:

- An upgrade of the quality of mechanical and electrical procedures (overall, 44% complete)
- A work authorization task force to improve the control of equipment
- The development of a standard for estimating the duration of maintenance work activities
- Further development of the Reliability Centered Maintenance (RCM) program

With regard to training improvements, the following activities were in progress:

- Maintenance supervisor training
- Planner training
- Enhancement to craft training programs

- ° A review of On-The-Job Training (OJT) incorporating new INPO guidelines
- ° Craft job skills analysis

To enhance the implementation of maintenance programs, the following programs have been initiated:

- ° "Partners For Success," a program to build planner/foreman/craft teamwork
- ° "Stop Think Observe Perform," a self-verification program to be included in formal communications training
- ° The incorporation of good work practices into maintenance laboratory training
- ° Upgrades to the Division Incident Investigation program

Mr. Martin asked whether involvement of the engineering organizations had been considered in the development of the maintenance improvement programs. Mr. Morgan recognized the importance of engineering involvement in maintenance activities and stated that they were considering how to better integrate the two.

#### Engineering/Technical Support

Mr. Short agreed with the comments and recommendations made in this functional area. He noted that increased support had been provided in design and root cause efforts, allowing cognizant engineers to focus on emergent issues. Additionally, he stated that when emergent issues become more demanding, management expects engineering to seek help outside their immediate organization. Mr. Short recognized that recent problems had pointed out weaknesses in initial root cause assessments and noted that efforts would be made to perform follow-up root cause validation to address these problems. He also noted that when the cause of a problem has not been identified, management needs to be made aware of the situation and evaluate the consequences of proceeding.

Mr. Reilly stated that efforts were continuing in the areas of set-point methodology and design information and drawings. In addition, he noted that efforts would be made to support the station technical organizations to reduce the time it takes to resolve issues.

Mr. Martin observed that the difference between a good and an excellent engineering program involves engineers that gravitate toward problems. He complimented the licensee for the progress they had made in the engineering areas in the three years since the program was rated SALP Category 3.

#### Safety Assessment/Quality Verification

The licensee concurred with the comments and recommendations made in this functional area.

Mr. Wenslawski then summarized the Board's assessment of the following functional areas:

- ° Radiological Controls
- ° Emergency Preparedness
- ° Security

The licensee provided the following comments after the discussion of each of the functional areas:

#### Radiological Controls

Mr. Knapp stated that he agreed with the findings presented in the meeting. Mr. Krieger noted that the chemistry department had been reorganized to improve its performance. One change was to have the department report to him directly rather than to the Technical Manager. Additionally, efforts were underway to improve the communication of problems between units. To promote this, the division investigations program would be improved to emphasize the communication of problems.

#### Emergency Preparedness

Mr. Zintl concurred with the comments made regarding this functional area and stated that they were addressing the fuel building public address system and emergency response requalification exam issues. In addition, he agreed to examine their dose assessment capabilities.

#### Security

Mr. Speer agreed with the findings presented and stated that the security organization would continue to maintain their level of performance. In addition, he noted that he recognized areas for improvement, such as security training, and was taking appropriate action.

#### Summary

Mr. Martin summarized the assessment, providing some perspective. Regarding Plant Operations, he noted that several years ago, the licensee's operations organization was a top performer. However, in the recent past its performance had declined. As demonstrated by the licensee's commitment to on-line maintenance and the reduced operator attention which resulted, management appeared to have lost touch with the Operations organization. Last year, the licensee put energy into programs to address these problems and, as a result, performance has improved. These results are evidenced in the more positive attitudes of plant operators.

Mr. Martin stated that the maintenance organization appears to be in the same situation that Operations was in last year. He stated that leadership and energy would be necessary to ensure that the programs initiated would be as successful as the Operations programs had been. Mr. Martin

concluded by observing that efforts in the quality assurance area appeared to be making a valuable contribution. He suggested that the licensee enhance the use of probabilistic risk assessment techniques in the decision making process.

Mr. Martin observed that the licensee was approaching excellent performance in the Operations, Engineering/Technical Support, and Safety Assurance/Quality Verification categories, and that current efforts to improve in these areas could result in the licensee achieving these goals.

Mr. Ray indicated that SCE had found the SALP report to be an accurate assessment, and would not respond in writing.

### 3. Discussion of Recent Issues

#### a. Salt Water Cooling System

Mr. Johnson summarized the issues discussed in Inspection Report 91-19 regarding salt water cooling (SWC) system availability. Prior to the Unit 2 refueling outage, one train of SWC was removed from service several times for heat exchanger cleaning. While the cumulative out of service time did not violate Technical Specification requirements, it did result in a significant increase in probabilistic risk. NRC management and inspectors questioned whether the licensee adequately considered taking advantage of an unplanned April 1991 outage to repair the valves. The decision not to make repairs at that time raised questions regarding whether SCE management attached sufficient importance to the SWC backflush feature and its capability to significantly reduce system outage time.

Although he felt that plant management could have addressed the SWC issues in a more formal manner, Mr. Morgan stated that he could not conclude that the SWC system lacked management attention and did not believe that insensitivity existed. Mr. Zimmerman observed that while the differences in the details of these circumstances could not be resolved in this forum, the level of sensitivity to SWC system issues and the need to take relative risk into perspective when planning maintenance work appeared to have been established.

#### b. Unit 1 Turbine Driven Auxiliary Feedwater Pump Steam Supply Valve CV-113

Mr. Johnson summarized the issues, to be further documented in Inspection Report 91-28, regarding inappropriate actions to correct long-standing problems with the operation of Unit 1 turbine driven auxiliary feedwater pump steam supply valve CV-113. He noted that the experiences with CV-113 indicated weaknesses in several areas, including maintenance procedures and controls, maintenance training, work planning, and technical staff involvement. Licensee representatives stated that they recognized the weaknesses indicated by the inspection findings, and would take appropriate actions to address them.

Mr. Zimmerman observed that the CV-113 issue would be an excellent topic for a case study of weaknesses in the maintenance program. Mr. Katz stated that a case study was underway and that lessons learned would be applied broadly.

c. Temporary Waiver of Compliance

Mr. Zimmerman discussed a temporary waiver of Technical Specification compliance issued on October 10 regarding testing of the low pressure safety injection check valves. Although the waiver had been approved, the waiver request included technical discrepancies and lacked thorough management review. Further, the need for a waiver could have been avoided had the licensee prepared for approval of the TS change requiring the testing.

Mr. Rosenblum agreed with these findings. He stated that the responsibility rested with his organization, and that he had initiated a complete review of the incident. Mr. Rosenblum committed to submit a letter discussing this issue and the action taken to correct the deficiencies identified.

d. Emergency Diesel Generator Issues

Mr. Short provided an update on the status of emergency diesel generator problems. He stated that a review was ongoing to determine the cause of failure of the Unit 2 train B diesel generator and of the fractured cam shaft dowel bolts of the Unit 3 train B diesel generator.

e. Main Steam Isolation Valves

Mr. Reilly provided a status of work being performed on the Unit 2 main steam isolation valves HV 8204 and HV 8205. He stated that an inadequate design modification to HV 8204 had resulted in the damage observed during the outage. Mr. Johnson observed that each of the valves had slightly different configurations due to the inconsistent application of corrective actions and encouraged the licensee to take a more uniform approach.

4. Conclusion

Mr. Martin stated that he considered the meeting to have been a productive discussion of the important issues involved, and thanked those present for their interest and participation.

The meeting concluded at 12:45 p.m.