

## NOTICE OF VIOLATION

Southern California Edison Company  
San Onofre Units 1, 2 and 3

Docket Nos. 50-206, 50-361,  
50-362  
License Nos. DPR-13, NPF-10,  
NPF-15

During an NRC inspection conducted on August 27 through October 21, 1992, 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, the violations are listed below:

- A. Technical Specification 6.8.1 for San Onofre Nuclear Generating Station, Units 1, 2, and 3, requires that written procedures be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2. Appendix A of Regulatory Guide 1.33 specifies that safety related activities should be covered by written procedures, including procedures for control of measuring and test equipment (M&TE).

Section 6.2.4 of procedure S0123-II-1.2, TCN 1-4, "Preparation And Responsibility Of The M&TE traveler," requires that, "Without exception all M&TE's used in conjunction with a Maintenance order or any other approved Station procedure shall be recorded in the Traveler."

Contrary to the above, as of October 1, 1992, the inspector identified 24 instances in which M&TE usage was not properly documented on travelers in accordance with procedure S0123-II-1.2. These instances included two cases in which the M&TE used were not properly documented and also needed to be evaluated due to calibration failures (I2-8526 used in M092041235000 and M1-3469 used in M091111631001). Additional examples of improperly documented M&TE usage were subsequently identified by the licensee.

This is a Severity Level IV violation (Supplement I) applicable to Units 1, 2, and 3.

- B. Technical Specification 6.8.1 for San Onofre Nuclear Generating Station, Units 1, 2, and 3, requires that written procedures be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2. Appendix A of Regulatory Guide 1.33 specifies that safety related activities should be covered by written procedures, including procedures for control of M&TE.

Sections 6.2.4 and 6.2.5 of procedure S0123-II-1.5, TCN 1-4, "Evaluation Of Calibrated Items After M&TE Failure," requires that the cognizant department supervisor detail the specific reasons that retests or recalibrations are not required if M&TE fails calibration. The procedure states, "This detail shall include identifying a component as non-safety related if this is the reason for not performing a retest or recalibration." Otherwise, the supervisor shall initiate a nonconformance report or initiate the proper work documents to perform remeasurements, retests, or recalibrations with known accurate M&TE.

Contrary to the above, as of October 1, 1992, M&TE used in conjunction with the MOs specified were not properly evaluated in accordance with procedure S0123-II-1.5. Specifically, evaluations for M&TE M1-1596 (used in M090042324000), I1-6427 (used in M089082495000), M2-3992 (used in M090100691000), M1-1973 (used in M09105011000), M1-2634 (used in M091041634000), and M2-4857 (used in M091121502000), did not provide adequate justification of why a retest or recalibration was not required nor were nonconformance reports issued to document that the equipment was operating properly.

This is a Severity Level IV violation (Supplement I) applicable to Units 1, 2, and 3.

- C. 10 CFR Part 50, Appendix B, Criterion XVI, requires, in part, that measures shall be established to assure that conditions adverse to quality, such as deficiencies, deviations, and nonconformances, are promptly identified and corrected. The measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

On June 21, 1990, a Quality Assurance (QA) audit of the M&TE program identified instances in which M&TE uses were not being properly documented on M&TE travelers in accordance with station procedure S0123-II-1.2, "Preparation And Responsibility Of The M&TE Traveler."

Contrary to the above, as of October 1, 1992, the licensee had not taken adequate actions to correct the deficiencies found in the 1990 QA audit, as evidenced by the fact that the inspector identified 24 instances in which M&TE usage was not documented in travelers as required by station procedure S0123-II-1.2.

This is a Severity Level IV violation (Supplement I) applicable to Units 1, 2, and 3.

- D. 10 CFR Part 50, Appendix B, Criterion XVI, requires, in part, that measures shall be established to assure that conditions adverse to quality, such as deficiencies, deviations, and nonconformances, are promptly identified and corrected. The measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

On September 27, 1991, an audit of the employee personnel records qualification program by the site Quality Assurance (QA) organization identified instances in which documentation of station personnel qualifications, in accordance with station procedure S0123-VI-33, "Personnel Records Qualification Program," had not been performed for several individuals.

Contrary to the above, as of October 15, 1992, the licensee had not taken adequate actions to correct the deficiencies found in the 1991 QA audit, as evidenced by the fact that the inspector identified four instances in

which documentation of personnel qualifications had not been performed in accordance with station procedure S0123-VI-33.

This is a Severity Level IV violation (Supplement I) applicable to Units 1, 2, and 3.

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 Nuclear Generating Station, 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, or, if contested, the basis for disputing the violation, (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, the Commission may issue an order or a demand for information as to why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown consideration will be given to extending the response time.

Dated at Walnut Creek, California  
this 20<sup>th</sup> day of November, 1992