



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE  
WALNUT CREEK, CALIFORNIA 94596-5368

MAR 19 1993

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

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

Attention: Mr. Harold B. Ray  
Senior Vice President, Nuclear

SUBJECT: FINAL SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT  
FOR SAN ONOFRE UNITS 1, 2 AND 3 (AUGUST 1, 1991 THROUGH NOVEMBER  
30, 1992)

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) Board Report Number 50-206/361/362/92-28, dated December 24, 1992, for your San Onofre Nuclear Generating Station and to the written comments provided in your February 16, 1993 letter (Enclosure 4) in response to the SALP Board's Report. The results of this assessment were discussed with you during a management meeting on January 14, 1993, as documented in Meeting Report Number 50-206/361/362/93-04, transmitted to you by our letter dated February 12, 1993 (Enclosure 3).

We have reviewed your comments made in the February 16, 1993 letter. The letter contained three comments regarding the SALP Board's Report in the areas of Maintenance/Surveillance, Engineering/Technical Support, and Safety Assessment/Quality Verification (SA/QV). We have considered these comments, as summarized below and further discussed in Enclosure 2.

Your February 16, 1993 letter provided new information to the SALP Board in stating that risk analysis information had in fact been considered by SCE management when developing the maintenance strategy to repair the High Pressure Safety Injection pump. The comments made in the Initial SALP Report were based on documented inspection report findings, discussions with SCE management, and Exit Meeting discussions which indicated that senior plant management did not consider this risk analysis information to be significant when planning the work. After consideration of this new information, the Board concluded that the associated SALP Report paragraph should be deleted (Enclosure 2, page 11). This change did not affect the SALP Board's conclusions regarding the Maintenance/Surveillance area. The Initial SALP Report, revised to reflect this change, is provided as Enclosure 2 to this letter as the Final SALP Report for San Onofre.

The NRC recognizes the progress reported by you in the commercial grade procurement area and discussed in the January 14, 1993 management meeting. However, our Initial SALP Report, which cited weaknesses in your program at that time, was based on the information available to the NRC staff in this area, as of the end of the SALP period. Based on this, the SALP Board has

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determined not to revise the SALP Report and its conclusion in the area of Engineering remains unchanged.

Your February 16, 1993 letter commented that management aspects of events were evaluated in both the Engineering/Technical Support and Safety Assessment/Quality Verification (SA/QV) areas, rather than in just the Engineering/Technical Support area. This resulted in a less positive evaluation in the SA/QV area. We would agree with your comment if Engineering management had been ineffective, but upper management had interceded to effectively deal with the issues discussed. That was not the case in the issues discussed in the SA/QV area. Upper management did not intercede effectively in these cases. Therefore, the SALP Board concluded that changes to the SA/QV section of the SALP Report were not considered to be warranted.

Overall NRC conclusions are presented in Enclosure 1 to this letter. As discussed in our January 14, 1993 management meeting, the challenge for Southern California Edison Company (SCE) is to effectively use the existing management, programs and personnel to consistently achieve good performance.

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.

Should you have any questions concerning this letter or the enclosures, we will be pleased to discuss them with you.

Sincerely,

*J. B. Martin*  
fsl J. B. Martin  
Regional Administrator

- Enclosures:
1. NRC Conclusions
  2. Final SALP Report
  3. SALP Meeting Report No. 50-206, 361, 362/93-04
  4. Licensee Response to Initial SALP Report dated February 16, 1993

cc w/enclosures:

H. E. Morgan, Vice President and Site Manager (San Clemente)  
R. W. Krieger, Station Manager (San Clemente)  
State of California  
INPO

bcc w/enclosures:  
 Chairman Selin  
 Commissioner Rogers  
 Commissioner Curtiss  
 Commissioner Remick  
 Commissioner de Planque  
 J. Taylor, EDO  
 J. Sniezek, DEDO  
 M. Lesser, OEDO  
 T. Murley, NRR  
 F. Miraglia, NRR  
 J. Lieberman, OE  
 DCS  
 PDR  
 LPDR

B. Faulkenberry  
 G. Cook  
 C. Holden, NRR  
 P. Ray, NRR  
 SALP Board Members  
 SALP File  
 Docket File

bcc w/o enclosure:  
 LFMB  
 M. Smith

*PER TELEPHONE*  
*W/C CALDWELL*  
 CALDWELL \_\_\_\_\_ WONG *HW* MILLER *[Signature]* RICHARDS *[Signature]* PERKINS \_\_\_\_\_  
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bcc w/enclosures:

Chairman Selin  
Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick  
Commissioner de Planque  
J. Taylor, EDO  
J. Sniezek, DEDO  
M. Lesser, OEDO  
T. Murley, NRR  
F. Miraglia, NRR  
J. Lieberman, OE  
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PDR  
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B. Faulkenberry  
G. Cook  
C. Holden, NRR  
P. Ray, NRR  
SALP Board Members  
SALP File  
Docket File

bcc w/o enclosure:

LFMB  
M. Smith

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w/c. CALDWELL  
CALDWELL HJW

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MILLER \_\_\_\_\_

RICHARDS [Signature]

PERKINS [Signature]

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SCARANO \_\_\_\_\_

PER E-MAIL  
FROM T. QUINN  
VIRGILIO HJW

MARTIN [Signature]

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## NRC CONCLUSIONS

### A. Comments Received From The Licensee

Southern California Edison Company's (SCE) February 16, 1993 response to the San Onofre SALP Report presented no significant objections to the content of the report. The SCE response identified three corrections and clarifications to the report. One of these three comments has been incorporated into the final report and does not affect the conclusions or rating for the associated functional area.

### B. NRC Conclusions Regarding Acceptability of the Licensee's Planned Corrective Actions

We concluded that the licensee's proposed actions to address areas needing improvement were responsive. We will review SCE's progress as part of our future inspection program, as appropriate.

### C. Regional Administrator's Conclusions Based on Consideration of the Licensee's Response

I have concluded that the overall ratings in the affected areas have not changed.

SALP BOARD REPORT REVISION SHEET

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NOW READS: An NRC inspection of the licensee's program for the procurement and dedication of commercial grade items used in safety-related applications at SONGS identified some weaknesses. These weaknesses included incomplete identification of appropriate safety functions, and incomplete specification and verification of specific safety function performance characteristics. To the licensee's credit, many of the dedication program weaknesses had been self-identified before the NRC's inspection, and the licensee has committed to fully upgrade their procurement program to staff guidelines by January 1993.

SHOULD READ: [This section of the report has not been changed.]

Basis: The SALP discussion of the licensee's programs for the procurement and dedication of commercial grade items used in safety-related applications at SONGS did include the information provided to the staff during the June 2, 1992 meeting. The inspection report issued by the staff on March 24, 1992, categorized the findings as deficiencies and stated that there was an apparent 2 year delay in upgrading the SCE program to be in accordance with NUMARC's first initiative on the dedication of commercial grade items. The inspection report further stated that the findings would be referred to Region V for any potential enforcement actions. Based on the information provided in the June 2, 1992 meeting, and on a generic re-evaluation of the staff's position in this area, we concluded that the findings should be considered weaknesses, not deficiencies, and that it would not be appropriate to cite the licensee in regard to any possible delay in implementing the NUMARC program.

The second point discussed by the licensee was in reference to a meeting held on January 13, 1993 and reported on in a memorandum dated February 2, 1993. There are two reasons for not including the results of this meeting in the SALP period under discussion here. First, the meeting occurred well after the SALP period had ended, and after the SALP report had been issued. Second, while the staff was pleased with the progress made by the licensee in upgrading their commercial grade program, this meeting was not an inspection and it would not be prudent to significantly alter the staff's previous inspection findings based on a brief discussion of issues that are better resolved by the normal inspection process. The progress of the licensee in the area of commercial grade programs will be the subject of future NRC inspections. Based on these two reasons, it is the staff's opinion that the progress noted to date in 1993, and any future information obtained by the staff in this area, is an appropriate subject for the next SALP report.

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NOW READS: One instance regarding the negative impact of scheduled maintenance on safety was observed. It involved a Unit 3 high pressure safety injection (HPSI) pump which was out of service for troubleshooting and repair

Enclosure 2

for more than six weeks. Although licensee management considered that the spare pump was installed for operational flexibility, a probabilistic risk assessment performed for work on a Unit 2 HPSI pump of a similar duration determined that this resulted in an approximate 10% increase in core damage probability.

SHOULD READ: [This paragraph has been deleted.]

Basis: While discussions with SCE management during the inspection period indicated that having the HPSI pump out of service for this length of time was not safety significant, the written response from SCE states that the PRA was considered when developing the HPSI maintenance strategy.

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NOW READS: ... but recent observations indicated continued weaknesses in: management assessment of emerging issues, including effective communication with the NRC on these issues; corrective action followup; and accuracy of submittals to the NRC.

SHOULD READ: [This section of the report, and a subsequent paragraph that describes these weaknesses, have not been changed.]

Basis: As identified in the SCE comment, the NRC does evaluate licensee management effectiveness in each of the individual SALP functional areas. When an issue with elevated safety significance requires interaction of senior licensee management, this issue is also evaluated under Safety Assessment / Quality Verification.