



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511

June 25, 2014

Mr. Tom Palmisano
Senior Vice President and
Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

**SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION – NRC INSPECTION
REPORT 05000361/2014502 AND 05000362/2014502**

Dear Mr. Palmisano:

On May 15, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the San Onofre Nuclear Generating Station, Units 2 and 3. The NRC inspector discussed the results of this inspection with you and other members of your staff during an on-site exit meeting conducted May 15, 2014. The inspector documented the results of this inspection in the enclosed inspection report.

NRC inspectors documented two licensee-identified Severity Level IV non-cited violations under the traditional enforcement process. If you contest the violations or significance of these NCVs, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and the NRC resident inspector at the San Onofre Nuclear Generating Station.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's

Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Mark S. Haire, Branch Chief
Plant Support Branch 1
Division of Reactor Safety

Docket Nos.: 05000361, 05000362
License Nos.: NPF-10, NPF-15

Enclosure:
Inspection Report 05000361/2014502
and 05000362/2014502
w/Attachment: Supplemental Information

cc w/enclosure: Electronic Distribution

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DATE	6/12/2014	6/12/2014	6/12/2014	6/23/2014	6/25/2014	

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Letter to Tom Palmisano from Mark Haire, dated June 25, 2014

SUBJECT: SAN ONFORE NUCLEAR GENERATING STATION – NRC INSPECTION
REPORT 05000361/2014502 AND 05000362/2014502

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Dockets: 05000361; 05000362

Licenses: NPF-10, NPF-15

Reports: 05000361/2014502; 05000362/2014502

Licensee: Southern California Edison Company

Facility: San Onofre Nuclear Generating Station, Units 2 and 3

Location: 5000 South Pacific Coast Highway, San Clemente, California

Dates: May 12 through May 15, 2014

Inspector: P. Elkmann, Senior Emergency Preparedness Inspector

Approved By: Mark S. Haire
Chief, Plant Support Branch 1
Division of Reactor Safety

Enclosure

SUMMARY

IR 05000361/2014502; 5000362/2014502; 05/12/2014 - 05/15/2014; San Onofre Nuclear Generating Station; Regional Inspection Report; 71114.05

The inspection activities described in this report were performed between May 12 and May 15, 2014, by an inspector from the NRC's Region IV office. Violations of NRC requirements are dispositioned in accordance with the NRC Enforcement Policy. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

Licensee-Identified Violations

Severity Level IV violations that were identified by the licensee have been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. These violations and associated corrective action tracking numbers are listed in Section 4OA7 of this report.

REPORT DETAILS

Emergency Preparedness

1EP2 Alert and Notification System Evaluation (71114.02)

a. Inspection Scope

The inspector verified the adequacy of the licensee's methods for testing the primary and backup alert and notification system (ANS). The inspector interviewed licensee personnel responsible for the maintenance of the primary and backup ANS and reviewed a sample of corrective action system reports written for ANS problems. The inspector compared the licensee's alert and notification system testing program with criteria in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1; FEMA Report REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants," and the licensee's current FEMA-approved alert and notification system design report, "System Design Report, Alert and Notification System (Community Alert Siren System)," dated June 13, 2013.

b. Findings

No findings were identified.

1EP3 Emergency Response Organization Staffing and Augmentation System (71114.03)

a. Inspection Scope

The inspector verified the licensee's emergency response organization on-shift and augmentation staffing levels were in accordance with the licensee's emergency plan commitments. The inspector reviewed documentation and discussed with licensee staff the operability of primary and backup systems for augmenting the on-shift emergency response staff to verify the adequacy of the licensee's methods for staffing emergency response facilities, including the licensee's ability to staff pre-planned alternate facilities. The inspector also reviewed records of emergency response organization augmentation tests and events to determine whether the licensee had maintained a capability to staff emergency response facilities within emergency plan timeliness commitments.

b. Findings

No findings were identified.

1EP5 Maintenance of Emergency Preparedness (71114.05)

a. Inspection Scope

The inspector reviewed the following for the period July 2012 through April 2014,

- After action reports for emergency classifications and events
- After action evaluation reports for licensee drills and exercises

- Independent audits and surveillances of the licensee's emergency preparedness program
- Self-assessments of the emergency preparedness program conducted by the licensee
- Licensee evaluations of changes made to the emergency plan and emergency plan implementing procedures
- Drill and exercise performance issues entered into the licensee's corrective action program
- Emergency preparedness program issues entered into the licensee's corrective action program
- Evaluations of changes in the population of the Emergency Planning Zone
- Maintenance records for equipment supporting the emergency preparedness program
- Emergency response organization and emergency planner training records

The inspector reviewed summaries of 664 corrective action program reports associated with emergency preparedness and selected 31 to review against program requirements to determine the licensee's ability to identify, evaluate, and correct problems in accordance with planning standard 10 CFR 50.47(b)(14) and 10 CFR Part 50, Appendix E, IV.F. The inspector verified that the licensee accurately and appropriately identified and corrected emergency preparedness weaknesses during critiques and assessments.

The inspector verified by facility walk-through that the Control Room, Technical Support Center, Alternate Emergency Operations Facility, and North Staging Area were maintained in accordance with the commitments of the licensee's emergency plan. The inspector also observed a limited-scope licensee drill conducted on May 13, 2014, and the licensee's response to a nearby wildfire on May 14, 2014.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

40A6 Meetings

Exit Meeting Summary

On May 15, 2014, the inspector presented the results of the onsite inspection of the licensee's emergency preparedness program to Mr. T. Palmisano, Vice President, and other members of the licensee staff. The licensee acknowledged the issues presented. The licensee confirmed that any proprietary information reviewed by the inspectors had been returned or destroyed.

40A7 Licensee-Identified Violations

The following Severity Level IV violations were identified by the licensee and are violations of NRC requirements which meet the criteria of the NRC Enforcement Policy for being dispositioned as non-cited violations.

Emergency Preparedness

- Severity Level IV. The licensee identified a failure to declare a Notification of Unusual Event emergency classification when the conditions existed on March 28, 2014. The failure to recognize entry conditions for emergency action level HU1.1, "Seismic Event," was a performance deficiency. The issue was entered into the licensee's corrective action program as Nuclear Notification 202827656.

Title 10 of the Code of Federal Regulations, Section 50.54(q)(2) requires, in part, that power reactor licensees follow an emergency plan that meets the requirements of 10 CFR 50, Appendix E, and the standards of 50.47(b). Section 50.47(b)(4) requires, in part, that a standard emergency action level scheme is in use by the licensee. Contrary to the above, on March 28, 2014, San Onofre Nuclear Generating Station did not follow an emergency plan that met the requirements of Appendix E and the standards of 50.47(b). Specifically, the licensee failed to implement a standard emergency action scheme which met the standards of 50.47(b)(4).

- Severity Level IV. The licensee identified a failure to follow the requirements of the San Onofre Emergency Plan, Section 8.1.4, which requires, in part, that the Manager, Emergency Planning, shall ensure the maintenance and inventory of site emergency equipment, supplies, and facilities as specified in emergency plan implementing procedures. The failure to perform surveillances required by plant procedures is a performance deficiency. This violation was entered into the licensee's corrective action program as Nuclear Notification 202542348, "Apparent Cause Evaluation: Emergency Planning Documentation Deficiencies."

Title 10 of the Code of Federal Regulations, Section 50.54(q)(2) requires, in part, that power reactor licensees follow an emergency plan that meets the requirements of 10 CFR 50, Appendix E, and the standards of 50.47(b). The San Onofre Emergency Plan, Revisions 34 through 36, Section 8.1.4, states in part, that the responsibilities of the Manager, Emergency Planning, shall include, "(10) Ensuring the maintenance and inventory of site emergency equipment, supplies, and facilities as specified in the emergency plan implementing procedures." Contrary to the above, in 2012 and 2013, the licensee did not follow San Onofre Emergency Plan, Section 8.1.4. Specifically, the Manager, Emergency Planning, did not ensure the maintenance and inventory of emergency facilities as specified in the emergency plan implementing procedures.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

L. Bosch, Manager, Oversight and Nuclear Safety Concerns
R. Brabec, Manager, Regulatory Affairs and Emergency Preparedness
J. Carrillo Jr., Technical Specialist, Performance Improvement
D. Cleavenger, Manager, Emergency Preparedness
T. Clepper, Manager, DIA
J. Davis, Operations Manager
K. Gallion, Manager, Emergency Preparedness
J. Jankie, Manager, Radiation Protection and Chemistry
M. Moran, Manger, Engineering
A. Murray, Communications Project Manager
T. Palmisano, Vice President
R. Pettus, Compliance Chief and Reportability Engineer
R. Quam, Manager, Security
B. Sholler, Shutdown Plant Manger

NRC Personnel

None

LIST OF DOCUMENTS REVIEWED

Section 1EP2: Alert and Notification System Testing

Procedures

<u>Number</u>	<u>Title</u>	<u>Revisions</u>
SO-123-VII-0.302	Onsite Emergency Siren System Test	6-7
SO123-XVIII-10	Siren – Community Alert Siren System – System Description and Operational Guide	17
SO123-XVIII-10.1	Siren – Community Alert Siren System – Biweekly Silent Test	13
SO123-XVIII-10.3	Siren – Community Alert Siren System – Quarterly Growl Test	17
SO123-XVIII-10.4	Siren – Community Alert Siren System – Response to a report of an Inadvertent Siren Activation	7
SO123-XVIII-10.5	Siren – Community Alert Siren System – Annual Activation Test Procedures	13
SO123-XVIII-10.6	Siren – Community Alert Siren System – Inspection and Maintenance	13

Nuclear Notifications (Corrective Action Program)

202134975 202292938 202345473

Section 1EP3: Emergency Response Organization Staffing and Augmentation System

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
SO123-VIII-30.7	Emergency Notifications	18
	Recall System Test performed July 23, 2012	
	Recall System Test performed August 14, 2012	
	Recall System Test performed September 25, 2012	
	Recall System Test performed October 20, 2012	
	Recall System Test performed November 28, 2012	
	Recall System Test performed January 20, 2013	
	Recall System Test performed May 19, 2013	
	Recall System Test performed September 13, 2013	

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
	Recall System Test performed December 11, 2013	
	Recall System Test performed December 16, 2013	
	Recall System Test performed March 20, 2014	
	Recall System Test performed May 3, 2014	

Nuclear Notifications (Corrective Action Program)

202083708 202398446

Section 1EP5: Maintenance of Emergency Preparedness

Documents

<u>Number</u>	<u>Title</u>	<u>Revision</u> <u>Date</u>
	San Onofre Nuclear Generating Station Emergency Plan	36
SO123-EP-1	SONGS Emergency Plan Implementation	9-1
SO123-VIII-CR	Emergency Response Organization Control Room Position Checklists	2
SO123-VIII-TSC	Emergency Response Organization Technical Support Center Position Checklists	1
SO123-VIII-0.100	Maintenance and Control of Emergency Planning Documents	17
SO123-VIII-0.101	Emergency Response Equipment Management	0
SO123-VIII-0.200	Emergency Plan Drills and Exercises	18
SO123-VIII-0.201	Emergency Plan Equipment Surveillance Program	27
SO123-VIII-0.202	Assignment of Emergency Response Personnel	11-12
SO123-VIII-1	Recognition and Classification of Emergencies	35-37
SO123-VIII-10	Emergency Coordinator Duties	30-32
SO123-VIII-10.3	Protective Action Recommendations	16
SO123-VIII-10.5	Event Closeout and Recovery	5
SO123-VIII-30.7	Emergency Notifications	17-18
SO123-VIII-CR	Emergency Response Organization	0-2
SO123-XV-ERO-1	Emergency Response Organization Standards and Expectations	5

Documents

<u>Number</u>	<u>Title</u>	<u>Revision Date</u>
SO123-XV-50	Corrective Action Program	30
SO123-XV-50.CAP-1	Writing Nuclear Notifications for Problem Identification and Resolution	11
SO123-XV-50.CAP-2	SONGS Nuclear Notification Screening	10
	Apparent Cause Evaluation, Notification 202044191, Drill Weakness Not Corrected	August 10, 2012
	Notification NX202125254, Observation of the Control Room Simulator	August 29, 2012
	Notification NX20212381, Observation of the Control Room Simulator	August 31, 2012
	Notification NX202193874, Observation of the Control Room Simulator	October 25, 2012
	Notification NX202197856, Observation of the Control Room Simulator	October 25, 2012
	SCES 008-12, Emergency Preparedness Audit	September 6, 2012
	SCES 009-13, Emergency Preparedness Audit	August 27, 2013
	Nuclear Oversight Assessment 133, Emergency Preparedness	September 18, 2013
	Nuclear Oversight Assessment 134, Emergency Preparedness	September 18, 2013
	Nuclear Oversight Assessment 145, Emergency Preparedness	October 23, 2013
	Nuclear Oversight Assessment 165, Emergency Preparedness	March 11, 2014
	Nuclear Oversight Assessment 167, Emergency Preparedness	March 18, 2014
	Notification 201811829, Emergency Planning Focused Assessment	June 29, 2012
	Notification 202284100, Emergency Planning Focused Assessment	March 29, 2013
	2014 SONGS Baseline Inspection Readiness Assessment Report	April 21, 2014

Documents

<u>Number</u>	<u>Title</u>	<u>Revision Date</u>
	After-Action Report, Notifications of Unusual Event, August 26, 2012	November 14, 2012
	After-Action Report, Notification of Unusual Event, March 28, 2014	April 25, 2014
Drill 1203	After-Action Report for the August 29, 2012 Drill	September 28, 2012
Drill 1204	After-Action Report for the October 25, 2012 Exercise	November 21, 2012
	After-Action Report for the November 7, 2012 Environmental Monitoring Drill	November 13, 2012
Drill 1301	After-Action Report for the April 16, 2013 Drill	August 6, 2013
Drill 1304	After-Action Report for the September 18, 2013 Drill	October 17, 2013
Drill 1305	After-Action Report for the October 23, 2013 Drill	April 4, 2014
Drill 1306	After-Action Report for the June 20, 2013 Medical Drill	July 10, 2013
	After-Action Report for the November 19, 2013 Drill	December 13, 2013
	Surveillance Record Log, Third Quarter 2013	October 17, 2013
	Surveillance Record Log, Fourth Quarter 2013	January 2, 2014
	Surveillance Record Log, First Quarter 2014	April 3, 2014
	Notification 202542349, Apparent Cause Evaluation, Emergency Planning Deficiencies	September 26, 2013
	San Onofre Nuclear Generating Station Emergency Preparedness Rulemaking Gap Assessment Report	May 7, 2012
	ERO On-Shift Staffing Analysis	2
KLD TR-525	San Onofre Nuclear Generating Station, Development of Evacuation Time Estimates, Final Report, Revision 1	November 2012
KLD TR-550	San Onofre Nuclear Generating Station, 2013 Population Update Analysis	May 30, 2013
	Emergency Planning Bulletin 1342B, Raddose V Operational Status	October 22, 2013

Nuclear Notifications (Corrective Action Program)

202065833	202065874	202066759	202075180	202093231	202094953
202100053	202128936	202146363	202152341	202162605	202171989
202182947	202195309	202234209	202256551	202315120	202334012
202374824	202416145	202417507	202497601	202542349	202543217
202535954	202608283	202632147	202880703	202882105	202883344