



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596
OCT 27 1989

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

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

Attention: Mr. Harold B. Ray, Vice President
Nuclear Engineering, Safety, and Licensing

Gentlemen:

This refers to the routine inspection conducted by Messrs. C. W. Caldwell, A. L. Hon, and C. D. Townsend of this office on July 30 through September 9, 1989 of activities authorized by NRC License Nos. DPR-13, NPF-10 and NPF-15 and to the discussion of our findings held by the inspectors with Mr. H. R. Ray and other members of the Southern California Edison staff at the conclusion of the inspection.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. Your response to this Notice is to be submitted in accordance with the provisions of 10 CFR 2.201, as stated in Appendix A, Notice of Violation.

Of particular concern is your staff's failure to fulfill Technical Specifications requirements on August 24, 1989 instead of relying on generic letter guidance, as discussed in paragraph 4.a of the enclosed inspection report. This lapse in the understanding and fulfilling of regulatory requirements should be clearly addressed as part of your response to the enclosed Notice of Violation.

We are also concerned with recent operational problems that have occurred in the last few months at San Onofre. In particular, problems were encountered with identifying control room emergency air cleanup system boundaries in Unit 2, control of reactor power during partial insertion of a part length control element assembly in Unit 2, understanding the transient insertion limit curve for Unit 2, restoration of an atmospheric dump valve to automatic operation in Unit 2, and the occurrence of a negative axial shape index that led to a manual reactor trip in Unit 2. These problems are considered to be attributable to training and to insufficient formality in the conduct of normal operations. Your attention to this matter is necessary to minimize the potential for further problems with performance of normal operations.

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This inspection included a followup inspection to a violation identified in inspection report 50-361/89-06. In your response to the Notice of Violation dated July 12, 1989, SCE denied that this event constituted a violation of the Technical Specification. After further review of this item, we still consider it to be a valid violation. As discussed in the enclosed inspection report, we consider corrective actions on this matter to have been completed.

In accordance with 10 CFR 2.790(a), a copy of this letter, the enclosure, and your response will be placed in the NRC Public Document Room.

The response directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

A. E. Chaffee, Deputy Director
Division of Reactor Safety and Projects

Enclosures:

1. Appendix A -- Notice of Violation
2. Inspection Report Nos. 50-206/89-24
50-361/89-24
and 50-362/89-24

cc w/Enclosures:

D. J. Fogarty, Executive Vice President
R. H. Bridenbecker, Vice President and Site Manager (San Clemente)
H. E. Morgan, Station Manager (San Clemente)
State of California

bcc w/enclosures:

Docket File
Project Inspector
Resident Inspector
G. Cook
B. Faulkenberry
J. Martin
A. Johnson
R. Nease, NRR

bcc w/enclosure 1 only:

M. Smith
N. Western
J. Zollicoffer

OCT 27 1989

Regional Conference received from O.E. on 10/26/89

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CTownsend
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REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO	YES / NO

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YES / NO	YES / NO

SEND TO PDR
YES / NO