

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company

Docket No. 50-361
50-362

San Onofre Units 2 and 3

License No. NPF-10
NPF-15

During an NRC inspection conducted on July 30 through September 9, 1989, two 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 (1989), the violations are listed below:

- A. Section 6.8.1 of the Unit 2 Technical Specifications requires written procedures to be established and implemented for "The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978." Appendix A of Regulatory Guide 1.33, Revision 2, includes in the listing of procedures which should be provided, "1. Administrative Procedures ... b. Authorities and Responsibilities for Safe Operation and Shutdown."

Section 6.5.2 of Operating Division Procedure S0123-0-14, TCN 0-9, "Technical Specification LCO Action Requirements (LCOAR) and Equipment Deficiency Mode Restraints (EDMR)," requires that upon discovery of inadvertent LCO 3.0.3 entry, immediate action to correct the problem shall be initiated. In addition, "If the condition is not corrected within 30 minutes of discovery or one hour after initiation time (whichever time is later), then initiate a plant shutdown."

Section 4.0.3 of the San Onofre Technical Specifications states, in part, that "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation."

Section 3.3.2 of the Technical Specifications requires loss of voltage relays associated with the 4.16 vital buses to be operable in Mode 1. Section 4.3.2.1 of the Technical Specifications specifies channel calibration requirements for these relays.

Contrary to the above, at approximately 1:00 p.m. on August 24, 1989, with the unit operating in Mode 1, the licensee determined that the channel calibration for the loss of voltage relays associated with the "A" Train 4.16 KV vital bus was required to have been performed on August 15, 1989. Since this channel was required to be operable pursuant to the limiting condition for operation under Technical Specification 3.3.2, Technical Specification 3.0.3 was entered. However, the required surveillance test was not completed until 12:02 p.m. on August 25, 1989, and a Unit shutdown was not initiated as required.

This is a Severity Level IV violation (Supplement I), applicable to Unit 2.

- B. Technical Specification 6.8.1 requires that applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978 be established and implemented.

Appendix A of Regulatory Guide 1.33, Section 9, "Procedure for Performing Maintenance," states that "Maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances."

Attachment 6 to procedure S0123-I-1.7, "Maintenance Order Preparation, Use and Scheduling (TCN 2-4)", states that:

"Work activities that require any obstruction to pass through a Control Room Boundary Doorway must be accurately described in the work documents as being a breach of Control Room CREACUS (control room emergency air cleanup system) boundaries. The work organization must ensure that any obstructions through the boundary doors, such as hoses, cables, etc., will have a quick disconnect device in the near vicinity of the breached doorway. The Maintenance Order will specify that personnel will be prepared to remove the obstruction and close the door when notified.

For cases where a work organization has an obstruction through a Control Room Boundary doorway, it will have an individual continuously stationed at the door ready to react to directions from Security or Operations personnel to remove the obstruction and close the door as directed."

Contrary to above, on August 15, 1989, CREACUS door AC236 was tied open with five temporary power cables installed through the door opening. These cables did not have quick disconnect devices installed and no one was stationed at the doorway.

This is a Severity Level IV violation (Supplement I), applicable to Units 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, 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 if admitted, (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, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

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

Dated at Walnut Creek, California
this 27 day of October, 1989