

Southern California Edison Company

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HAROLD B. RAY  
VICE PRESIDENT

November 21, 1989

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TELEPHONE  
714 458-6600

Mr. Dennis F. Kirsch, Chief  
Reactor Safety Branch  
U. S. Nuclear Regulatory Commission, Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596-5368

Dear Mr. Kirsch:

Subject: **Docket Nos. 50-206 and 50-361**  
**Response to NRC Inspection Conclusion**  
**San Onofre Nuclear Generating Station**

In a letter from you to me dated August 15, 1989 which forwards Inspection Report Nos. 50-206/89-21 and 50-361/89-21, you included the following comment:

"(W)e have concluded that additional management attention is required to ensure that the San Onofre Commitment Register system (SOCR) efficiently functions to ensure timely resolution of NRC concerns. In several instances, the inspector noted that there has been a lack of attention to detail and timeliness on the part of licensee personnel responsible for following up on NRC identified concerns and there has been inadequate priority and resources assigned to resolve NRC identified concerns."

In order to accurately measure the magnitude of the problem, Edison conducted a comprehensive audit of all NRC-related items in SOCR, including items defined by Edison as well as those defined by the NRC. At the time of the audit in September, there were a total of 617 such items, and about half indicated they were either overdue or contained some other form of schedule discrepancy. Clearly, this indicated that SOCR was not being used to manage the closure of these items, as much of this status was shown incorrectly.

For the past two months since the completion of this audit, a concentrated effort has been undertaken to accomplish the following:

- o Identify any items which involve a failure to meet a commitment which should be reported to the NRC. The results of this effort have been completed and reflected in separate communications, as appropriate.

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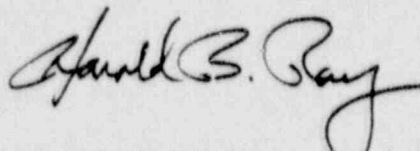
- o Correct errors in the data base which result from incorrect or deficient entry of information. For example, a mistaken impression has existed among some that by sending a copy of correspondence to the NRC to the SOCR address that action would automatically be taken to close the SOCR item.
- o Determine why the growing number of apparently overdue items previously received little or no notice from cognizant managers and supervisors and institute corrective action.
- o Identify the features of SOCR which cause it to be user unfriendly, with the result that data were not maintained current and a number of other, separate commitment tracking systems were established to meet the needs of individual organizations.
- o Initiate action required to consolidate the various commitment tracking systems in the two nuclear departments, Nuclear Engineering, Safety & Licensing and Nuclear Generation Site, into a single, integrated, user friendly system with appropriate resources to ensure it is maintained and used effectively.
- o Establish requirements to ensure that closure of NRC-related commitments is validly based on completion of the associated action.

We estimate that completion of this effort will require a period of six months. In the meantime, special attention will be devoted to NRC-related items in SOCR to ensure that they are closely followed by cognizant management and completed as required.

Separate from the problems with SOCR, we have considered the need for additional attention to detail and timeliness, and for a higher priority and resource commitment, relative to concerns identified by the NRC. I believe there is such a need, and Mr. Bridenbecker and I are taking action to ensure it is met in the future.

If you have any questions or comments, or if you would like additional information, please let me know.

Sincerely,



cc: J. B. Martin, Regional Administrator, Region V  
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre  
G. Knighton, Office of Nuclear Reactor Regulation, NRC