

Southern California Edison Company

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L. T. PAPAY
VICE PRESIDENT



TELEPHONE
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October 6, 1980

Mr. R. H. Engelken, Director
Office of Inspection and Enforcement
Region V
U. S. Nuclear Regulatory Commission
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94596

Dear Mr. Engelken:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station, Unit 2

In a letter from your office dated September 17, 1980 we were requested to respond to a Notice of Violation resulting from inspections of San Onofre Unit 2 startup activities which took place during the period July 18 to August 15, 1980. Our response to this Notice of Violation is provided as Attachment 1.

I trust the attachment responds adequately to all aspects of the Notice of Violation. If you have any questions, or if we can provide additional information, please let me know.

Very truly yours,

A handwritten signature in cursive script, appearing to read "L. T. Papay".

Attachment

cc: R. J. Pate (NRC-San Onofre Units 2 and 3)

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80-109

RESPONSE TO NRC NOTICE OF VIOLATION
DATED SEPTEMBER 17, 1980

San Onofre Nuclear Generating Station, Unit 2

Response to the Notice of Violation is provided below. A statement of the condition described by the notice is given for reference.

NOTICE OF VIOLATION

"Based on the results of an NRC inspection conducted on July 18 to August 15, 1980, it appears that one of your activities was not conducted in full compliance with conditions of your NRC Construction Permit No. CPPR-97 as indicated below:

Appendix B of 10 CFR 50, Criterion V, states, in part, that, 'Activities affecting quality shall be prescribed by documented instructions ... and shall be accomplished in accordance with these instructions....' Section 17 of the FSAR commits to comply with the requirements of 10 CFR 50, Appendix B.

The plant procedure WPP/QCI-800, Rev. 2, Construction/Startup Turnover Procedure, states in Paragraph 6.7.1.3 that the turnover package shall be signed and dated by the S/U QA. 'His signature and date shall signify that the Component or System Turnover Package has been reviewed for completeness and accountability prior to transmitting the package to EDMC for retention.'

Contrary to the above, the inspector found the startup package for the Safety Injection System and a change to the startup package for the 4.16 KVA System in EDMC (records storage) without the S/U QA signature.

This is a deficiency."

RESPONSE

1. Corrective Steps Which Have Been Taken and Results Achieved

Construction System Turnover Package 2-BHA-01 (Safety Injection System) and Turnover Package Change Request, file no. 55, to Turnover Package 2-PBA-01 (4.16 KVA System) were reviewed and signed by Startup QA.

All Construction System Turnover Packages and Turnover Package Change Requests in EDMC were reviewed to assure that they were properly signed. An additional six (6) Construction Turnover Packages and ten (10) Turnover Package Change Requests were found that required Startup QA review and signature. These reviews were accomplished and documented.

Startup QA personnel have been instructed to exercise additional attention to assuring that reviews have been accomplished prior to transmittal of documents to EDMC.

2. - Corrective Steps Which Will be Taken

WPP/QCI-800 will be revised to provide positive control of the routing of Turnover Packages to Startup QA for review and approval and to provide a requirement for Turnover Package Change Requests to be reviewed and approved by the same organization that approved the original Turnover Package.

3. Date by Which Compliance Will be Achieved

Full compliance will be achieved by October 17, 1980, when the appropriate revisions to WPP/QCI-800 are complete.