

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-361/80-20

Docket No. 50-231 License No. CPPR-97 Safeguards Group _____

Licensee: Scuthern California Edison Company

P. O. Box 800 - 2244 Walnut Grove Avenue

Rosemead, California 9177-

Facility Name: San Onofre 2

Inspection at: San Onofre Site, San Diego County, CA and Corporate Offices, Rosemead, CA

Inspection conducted: November 3-7, 1980

Inspectors: R. F. Fish 12/11/80
R. F. Fish, Radiation Specialist Date Signed

M. Cillis 12/12/80
M. Cillis, Radiation Specialist Date Signed

Approved by: F. A. Wenslawski 12/12/80
F. A. Wenslawski, Chief, Reactor Radiation Safety Section Date Signed

Approved By: H. E. Book 12/2/80
H. E. Book, Chief, Fuel Facility and Materials Safety Branch Date Signed

Summary:

Inspection on November 3-7, 1980 (Report No. 50-361/80-20)

Areas Inspected: Routine, unannounced preoperational inspection of licensee action on previous inspection findings, preoperational testing procedures, preoperational environmental monitoring program, quality assurance action on IE bulletins and circulars and a tour of the facility. The inspection involved 69 hours of onsite time by two inspectors.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

Southern California Edison Company

D. Rundstrom, Research Scientist
R. De La Parra, Engineer
*J. Albers, Chemical Radiation Protection Engineer
B. Graham, Chemical Radiation Protection Engineer
W. Moody, Manager, Nuclear Licensing
W. Swab, Startup Engineering Supervisor
I. Isturiz, EDM Group Leader
J. Thomas, Senior QA Engineer
*H. Chun, QA Engineer
*P. Croy, Project QA Supervisor, Units 2 and 3
D. Stonecipher, Supervisor, Operations QA/QC
*T. Garven, QA Engineer
R. Fitch, QA Engineer
J. Pantaleo, QA Engineer

Bechtel Power Corporation

J. Mackey, Startup Engineer

*Denotes those present at exit interview.

2. Licensee Action on Previous Inspection Findings

(Open) Unresolved Item (80-14-01): Primary calibration of process and effluent radiation monitors. A partial examination of the primary calibration data and curves stored in the EDM (document control) files was performed. This item will remain unresolved until the examination of these records has been completed.

(Open) Unresolved Item (80-14-02): Biweekly inspections for erosion during transmission line activities. Subsequent to the August 11-15, 1980 inspection Southern California Edison (SCE) sent a letter to San Diego Gas & Electric (SDG&E) discussing the NRC findings and describing those transmission line activities that could involve cut and fill work which would require erosion inspections. By letter dated September 26, 1980 SDG&E responded to SCE on this matter and stated that the transmission line work was not specifically related to the construction of Units 2 and 3. SCE informed the inspector that SDG&E is preparing a written report of transmission line work performed which will be sent to SCE. This item will remain unresolved until the SDG&E report has been examined.

3. Preoperational Testing Procedures

The preoperational test procedure for the waste gas system (No. 2PE-240-01) was examined. This procedure was Revision 0 and still in draft form. The procedure was formatted with the following topics: objectives, acceptance criteria, references, prerequisites, limits and precautions, test equipment, initial conditions, procedure and data collection, system restoration. The procedure was being reviewed by interested groups and, therefore, subject to some change prior to the test performance. It appeared from the examination that the objectives would be met and no significant deficiencies were identified.

Two additional procedures were examined. One procedure (No. CV-240-06) was for the flushing of the gaseous radwaste system. The other procedure (No. CV-240-04) was for the flushing of the miscellaneous liquid waste system. These procedures appeared to accomplish the described objectives and no significant deficiencies were identified.

No items of noncompliance or deviations were identified.

4. Preoperational Environmental Monitoring Program

The San Onofre Units 2 and 3 preoperational environmental monitoring program has been described in paragraphs 3 and 4 of IE Inspection Report No. 50-361/79-04. Since that January 1979 inspection there have been some minor changes to the program. For some time Dave Rundstrom, Research Scientist, has been responsible for the nonradiological part of the program. There has been no change in the contractors performing the nonradiological, preoperational environmental monitoring program since the January 1979 inspection. Mr. Rundstrom has monitored this effort by (1) reviewing the monthly verification reports submitted to SCE by the contractors, (2) examination of the SCE QA audit reports related to the contractor activities and (3) being a member of the committee that reviews the data and prepares the annual reports which have been sent to the NRC. Expert consultants to SCE have also been included in the membership of the committee reviewing the preoperational environmental monitoring data. The contracted activities had not been changed since the January 1979 inspection.

There have been no changes in the radiological part of the preoperational environmental monitoring program. The inspector confirmed that the air sampler (particulate and iodine) located east of Units 2 and 3 was operating and the two TID stations located near the southeast and south southeast boundary of the site were in place.

On an annual basis SCE has been submitting reports of the results of the environmental monitoring performed in connection with the preoperational effort for Units 2 and 3 and the routine effort for Unit 1 to the NRC. The report of the 1979 data included the results of the special ichthyoplankton study (Section VI of Volume II). The 1979 report was submitted to the NRC as an enclosure to a March 31, 1980 letter. The inspection included an examination of the air sampling (particulate and iodine) and direct radiation (TLD) data used to prepare the 1979 report and that accumulated during the first 6 months of 1980. This examination disclosed that direct radiation data for the south southwest boundary location was missing for the first and second quarters of 1979. The TLD's for these periods were lost due to moving the fence to which they were attached. The corrective action was to place them in a larger plastic pipe holder that was attached to the fence post rather than the fencing.

By letter dated January 15, 1980 SCE informed the NRC of their intention to terminate the preoperational monitoring program (PMP) for Units 2 and 3 in June 1980 because 2 years of data had been collected and a delay in the initial fuel loading and operation of Unit 2 has occurred. In a September 11, 1980 letter, Mr. A. Schwencer, NRC, informed Mr. Robert Dietch, SCE, that the (NRC) staff had reviewed the PMP data collected and believed that an adequate data base had been accumulated. Also this letter states the NRC had no objection to the termination of the PMP at the end of the 2 year period. The applicant stated that the phase out of the PMP occurred during the period June through August 1980. It was also stated that the following critical activities would be continued so as to provide a continuity in the data base: oceanographic temperature measurements, nonradiological fish sampling, kelp beds mapping and underwater density measurements. The radiological environmental monitoring will also continue since most of this effort is connected with Unit 1.

During the inspection the operations of the Corporate EDM (document control) Center were examined in connection with the PMP data storage. The original documents (data sheets) have been received on an annual basis from the contractors. The documents have been coded for retrieval purposes. The codes and key works were then entered into the computer. The documents were microfiched and stored in cabinets that are kept locked except during periods of use. Copies of the microfiches have been placed in separate files and these have been used as working copies. The operations were confirmed by requesting and examining on a random basis the October 1979 data sheets for the nonradiological, environmental monitoring samples. The original documents have been stored in a warehouse. The applicant stated that the site EDM Center is a duplicate of the one at the Corporate Office and it also has the capability and does process original documents.

No items of noncompliance or deviations were identified.

5. Quality Assurance

The August 1980 inspection of the construction environmental monitoring program included an examination of three related QA audit reports. One of these audits resulted in a corrective action request (CAR) concerning the failure to perform beach and bottom profiles in January and August 1978. This inspection included an examination of this CAR (No. EM-71) and the corrective action. The failure to perform the required profiles in January was due to inclement weather. The August failure was related to a strike and the lack of alternate provisions for such examinations under the circumstances. The corrective action was to inform the involved personnel that they must inform Environmental Engineering if they will be unable to perform the profiles so arrangements can be made to have someone else perform the work.

No items of noncompliance or deviations were identified.

6. Tour of Facility

During the inspection a tour of the Unit 2 facility was made. The tour included the Unit 2 Containment and Fuel Handling Buildings and the Auxiliary Building.

No items of noncompliance or deviations were identified.

7. Actions on IE Bulletins and Circulars

a. IEB 80-10, Contamination of Nonradioactive System and Resulting Potential for Unmonitored, Uncontrolled Release of Radioactivity to Environment

This bulletin, which was sent to construction permit holders for information, has been discussed with Bechtel Power Corporation (BPC). BPC has been requested to provide a formal summary of the several discussions that took place concerning the bulletin as it relates to Units 2 and 3.

b. IE Circular 79-21, Prevention of Unplanned Release of Radioactivity

By letter dated August 8, 1980 BPC provided SCE with a summary of their review of the Units 2 and 3 as built systems having the potential for unplanned releases of radioactivity because of design or construction errors. Two potential problems were identified -possible spills of radioactive water or resin in the truck bay area during the transfer of the resins and cross-connects between Units 2 and 3 systems during the startup of Unit 2. The former is undergoing a designed review by BPC as authorized by SCE. The latter will be prevented by locking closed, capping or flanging the cross-connects. An action item report was issued to assure appropriate action by SCE Startup and SCE Nuclear Operations to prevent contamination of Unit 3 systems during the startup of Unit 2. Item is closed.

8. Exit Interview

At the conclusion of the inspection, the inspectors met with those persons identified in paragraph 1 of this report. Mr. D. E. Nunn, Manager of QA, SCE, was also present. Mr. R. J. Pate, NRC Senior Resident Inspector, and Mr. C. Schwan, Region V NRC Inspector, were present at the exit interview. The scope of this inspection and the findings were described. The applicant was informed that there were no items of noncompliance or deviations and the two unresolved items (see paragraph 2 of this report) would remain unresolved.