

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Nuclear Generating Station, Unit 1

Docket No. 50-206/81-15
License DPR-13

As a result of the inspection conducted on March 29 to May 1, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- a. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Appendix "A" of USNRC Regulatory Guide 1.33, Revision 1.

1. Paragraph 9e of Appendix A to the Guide states that general procedures for the control of maintenance, repair, replacement and modification work should be prepared. These procedures should include information such as the following; (1) Method for obtaining permission and clearance for operation personnel to work and for logging such work.

Station Order SOI-A-17, "Work Authorizations" requires that no person shall work on station equipment without first obtaining proper authorization from the operator in charge or the Watch Engineer.

On April 1, 1981, a wireman removed the wire supplying power to fuse #2 (Temporary Feed to FI 2004), not knowing that the wire had not been deenergized. As the wire was pulled out of the panel, it grounded the safety-related Vital Bus #2, blew a fuse in the normal power supply to that bus, causing the bus to be transferred to its alternate supply, and created a transient which tripped open the firewater deluge valve to the #2 Diesel Generator.

Contrary to the above requirements, proper authorization to perform the wire removal had not been obtained prior to performing this work.

This is a Severity Level V violation (Supplement I).

2. Paragraph 9a of Appendix A to the Guide states that maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Nonconformance Report SOI-P-485 Revision 0, detailed the licensee's procedure for the repair of a leaking epoxy patch in the discharge line of the South Saltwater Pump. Paragraph 20.8.2 of this procedure required that an initial service leak test per ANSI B31.1 be performed prior to the return to service of the line.

The applicable edition of ANSI B31.1, Paragraph 137.6.2 states that "when performing an initial service leak test the piping system shall be gradually brought up to normal operation pressure and continuously held for a minimum time of 10 minutes. Examination for leakage shall be made of all joints and connections. The piping system...shall show no visual evidence of weeping or leaking."

On April 13, 1981, licensee personnel performed this initial service leak test. At 8:40 a.m. the inspector was informed by the witnessing test engineer that the test had been satisfactorily completed. At 8:45 a.m. the Control Operator's log stated that the "South Saltwater Pump leak test completed satisfactory. South Saltwater Pump O.K. for service."

Contrary to the above requirements, the inspector observed that the acceptance criteria of the procedure had not been met. At 8:45 a.m. the South Saltwater Pump flange downstream of POV-6 had not yet been observed for 10 minutes with no leakage, and was, in fact, still leaking from several points.

This is a Severity Level VI violation (Supplement I).

3. Paragraph 7b of Appendix A to the Guide recommends that procedures for control of radioactivity include spent resin handling.
- SO 1-5.6, "Transfer of Spent Resins," Step 6.11 requires an operator to "Close primary flush water to spent resin tank," following spent resin transfer.

Contrary to this requirement, on April 23, 1981 at about 6:30 p.m. the operator did not close this valve following spent resin transfer. This error caused the Auxiliary Building Sump and the Decontamination Drain Tank to overflow the next morning. Approximately 150 gallons of contaminated water spilled over the upper and lower level floor drains of the Auxiliary Building Sump and the decontamination shower in the Control Building.

This is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201 the Sacramento Municipal Utility District is required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

June 1, 1981
Dated

Gerald B. Zwetzig
Gerald B. Zwetzig, Acting Chief
Reactor Projects Section 2