

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Nuclear Generating Station
Units 1, 2, and 3

Docket Nos. 50-206, 50-361
and 50-362
License Nos. DPR-13, NPF-14
and NPF-15

During an NRC inspection conducted on October 16-20, 1989, October 30-November 3, and November 8, 1989, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violation is listed below:

A. Technical Specification 6.11, Radiation Protection Program, states:

"Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

10 CFR 20.103(c) states, in part:

"When respiratory protective equipment is used to limit the inhalation of airborne radioactive material...[t]he licensee may make allowance for this use...in estimating exposures of individuals...provided that... (2)[t]he licensee maintains and implements a respiratory protection program that includes, as a minimum:...written procedures regarding...maintenance of respirators...."

1. Licensee procedure S0123-VII-2, "Respiratory Protection Program," Revision 8, dated August 15, 1989, states in part:

"...specific use and maintenance procedures for respiratory protection equipment will be provided in the Health Physics S0123-VII-2.xxx series procedures."

Contrary to the above, as of November 2, 1989, National Draeger model Panorama Nova, Norton/North model 7500-8, Mine Safety Appliances models Ultratwin and Ultravue full-facepiece air purifying respirators were in use by the licensee, and the licensee's procedure (S0123-VII-2.4, "Use, Cleaning, Inspection and Maintenance of Full-Face Air Purifying Respirators," Revision 7, dated May 15, 1989) for maintenance of full-face air purifying respirators was not specific in that no instructions were included for assembly of the respirators governed by the procedure, and the procedure did not reference the manufacturers' instructions..

2. Licensee procedure S0123-VII-2.4, Revision 7, states in part that:

"Replacement parts will only be provided by the respirator manufacturer as maintaining the NIOSH or MSHA approval for the respirator. Parts will not be interchanged between different respirator types."

Contrary to the above, on November 1, 1989, the licensee had assembled, inspected and provided for use, more than 30 full-facepiece respirators, but the respirators either had missing parts, parts which had not been manufactured by the manufacturer of the respirators, parts which had been interchanged between respirators of different types from the same manufacturer, or parts for which the inspection checklists indicated their presence, but which were not part of the assembly.

3. Licensee procedure S0123-VII2.4, Revision 6, dated June 10, 1988, stated in part, that prior to use of a copy of the procedure:


"...it is the user's responsibility to verify that the revision and any [Temporary Change Notices] are current"

Contrary to the above, as of October 31, 1989, a copy of S0123-VII-2.4, Revision 6, had been in daily use by licensee personnel performing respiratory protective device maintenance in the Respiratory Protective Device Room on the 68' elevation of the Unit 2/3 Radwaste Building, since May 15, 1989, when Revision 7 of the procedure became effective and was available for verification and use.

These are, in the aggregate, a Severity Level IV violation (Supplement IV).

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, Dosimetry Clerk 20555, with a copy to the Regional Administrator, Region V, 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



Ross A. Scarano, Director
Division of Radiation Safety
and Safeguards

Dated at Walnut Creek, California
this 8th day of December, 1989