

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Unit 1

Docket No. 50-206
License No. DPR-13

During an NRC inspection conducted on October 7 through November 22, 1989, two violations of NRC requirements were identified. In accordance with 10 CFR Part 2, Appendix C, "General Statement of Policy and Procedure for NRC Enforcement Actions," the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," as implemented by Chapter 1-F of the Southern California Edison Topical Quality Assurance Manual states:

"Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

Contrary to the above, the licensee's program did not assure that adequate corrective actions were taken to prevent additional failures of Automatic Switch Corporation (ASCO) solenoid valves after it was identified in Licensee Event Report (LER) 87-016 (dated December 12, 1987) that the presence of a thin hard film formed between the top of the slug and the slug housing was the cause for five solenoid valve failures in 1987. On March 11, 1988 ASCO informed the licensee that a thin coat of Dow Corning 550 lubricant was applied to the valves, and cognizant licensee personnel at that time recognized this lubricant to be the cause of the 1987 failures. Notwithstanding the knowledge within the licensee's organization of the root cause of the failures,

1. The Nuclear Engineering & Construction (Projects) group installed new ASCO solenoid valves for CV-304 and CV-305 in April 1988, unaware that previous failures of similar ASCO valves had been experienced;
2. On August 23, 1989, CV-304, in the normal charging line to reactor coolant system Loop A, failed to close due to the use of Dow Corning 550 lubricant on the associated ASCO solenoid valve;
3. The ASCO solenoid valves models of concern were not added to the licensee's Control of Problem Equipment (COPE) List until September 1, 1989, following the August 23, 1989 failure of CV-304.

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

- B. Section 3.3.1 of the Unit 1 Technical Specification (TS) for the safety injection and containment spray systems states that the reactor shall not be maintained critical unless a number of conditions are met. These Limiting Conditions for Operation (LCOs) include the operability of two recirculation pumps, the recirculation heat exchanger, two charging pumps, and valves and interlocks associated with these systems. With inoperable associated valves for this TS, Section 3.0.3 of the TS applies.

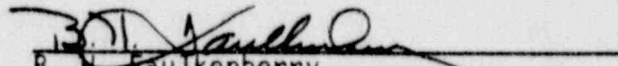
Section 3.0.3 of the TS specifies that, when an LCO is not met, action shall be initiated within one hour to place the Unit in a Mode in which the specification does not apply by placing it in at least hot standby within the next six hours and in at least hot shutdown within the following six hours.

Contrary to the above, on August 23, 1989, with Unit 1 operating in Mode 1, the licensee did not initiate action within one hour to shut down the Unit after it was determined at 3:22 p.m. that LCO 3.3.1 was not satisfied. Specifically, charging isolation valve CV-304, a valve which must close to ensure acceptable post-LOCA, safety injection system operation, was inoperable.

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

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, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Senior Resident Inspector, San Onofre, 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


B. H. Faulkenberry
Deputy Regional Administrator

Dated at Walnut Creek, California
this 26th day of December, 1989