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January 8, 1990

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Subject: Docket Nos. 50-206, 50-361 and 50-362
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Units 1, 2 and 3

Reference: Letter, Mr. R. A. Scarano (NRC) to Mr. Harold B. Ray (SCE), dated December 8, 1989

The reference forwarded NRC Inspection Report Nos. 50-206/89-28, 50-361/89-28, and 50-362/89-28 and a Notice of Violation resulting from the routine inspection conducted by Mr. G. Cicotte. In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison reply to the subject Notice of Violation.

We have responded to the referenced letter's concern about our audit program in my letter dated December 20, 1989. We will provide a separate response to the referenced letter's concern about the apparent declining trend in the radiation protection program by January 19, 1990.

If you require any additional information, please let me know.

Very truly yours,

Harold B. Ray

Enclosure

cc: J. B. Martin, Regional Administrator, Region V
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

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ENCLOSURE
REPLY TO A NOTICE OF VIOLATION

Appendix A to Mr. Scarano's letter, dated December 12, 1989, states in part:

"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 exposure 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 SO123-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 SO123-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 (SO123-VII-2.4, 'Use, Cleaning, Inspection and Maintenance of Full-Face Air Purifying Respirators,' Revision 7, dated May 15, 1989) for maintenance of full-facepiece 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."

RESPONSE TO ITEM A.1

1. Reasons for the violation, if admitted

Procedure SO123-VII-2.4 was deficient in two respects: (1) the procedure did not contain a manufacturer's exploded parts diagram (used to ensure correct assembly) for any of the respirators used at San Onofre; and (2) although the procedure contained a parts list for MSA respirators, it did not contain a parts list for Draeger and Norton/North respirators.

The reason the procedure never contained a manufacturer's exploded parts diagram, or referred the procedure user to such a diagram in a vendor manual, was an oversight in the preparation of the procedure. Procedure SO123-VII-2.4 was initially issued on February 8, 1982. Neither during its preparation, nor in subsequent revisions, was it recognized that the procedure needed the degree of detail afforded by a manufacturer's exploded parts diagram.

The procedure was revised (Revision 3) on June 3, 1985, to include the MSA parts list. When Draeger and Norton/North respirators were subsequently procured and added to the respirator program, no assessment was made to identify that procedure SO123-VII-2.4 required revision to include the Draeger or Norton/North respirators. This omission remained undetected because: (1) the routine biennial procedure review, conducted in 1988 failed to identify that Draeger and Norton/North respirator-types had not been incorporated into the procedure; and (2) respiratory protection personnel failed to notify supervision that the procedure did not address Draeger and Norton/North respirators.

2. Corrective steps that have been taken and the results achieved

Procedure SO123-VII-2.4 was revised on December 20, 1989. The procedure now includes both the manufacturers' exploded parts diagrams and parts lists for the MSA and Draeger respirators. Norton/North respirators have been permanently removed from service at San Onofre.

On November 27, 1989, respiratory protection supervision were re-instructed on the necessity to apply adequate attention to detail when preparing, revising or reviewing procedures. On December 15, 1989, respiratory protection personnel were re-instructed in the requirement to promptly identify to supervision any instances where procedure steps are inaccurate or outdated.

3. Corrective steps that will be taken to avoid further violations

Health Physics respiratory protection series SO123-VII-2 procedures, are being reviewed and revisions, if necessary, will be issued by March 31, 1990.

Enhancements will be developed and implemented by February 28, 1990, to the Health Physics process for adding new equipment, to assess the impact of new equipment on procedures.

Guidance for Health Physics personnel performing biennial procedure reviews will be issued by February 28, 1990.

4. Date when full compliance will be achieved

Full compliance was achieved on December 20, 1989, when procedure SO123-VII-2.4, Revision 9 was issued.

Appendix A to Mr. Scarano's letter, dated December 12, 1989, states in part:

"2. Licensee procedure SO123-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."

RESPONSE TO ITEM A.2

1. Reasons for the violation, if admitted

SCE has concluded that for the deficiencies identified by the NRC: (1) the missing and interchanged parts were caused by the failure to include an exploded parts diagram in procedure SO123-VII-2.4, which has been discussed in the response to item A.1; and (2) the use of substitute parts resulted from the failure to follow applicable procedures. SCE's review determined that the "parts for which the inspection checklists indicated their presence, but which were not part of the assembly" refers to an incorrectly completed checklist, due to personnel error, rather than to a missing or substitute part required by the respirator.

SCE has analyzed the assembly deficiencies identified by the NRC and has concluded that, although unacceptable, they would not have resulted in a significant reduction in the level of protection afforded by the respirators.

2. Corrective steps that have been taken and the results achieved

Respirator issuance was suspended the evening of November 3, 1989, and all respirators were formally removed from service. A thorough reinspection was performed of respirators under the direct supervision of manufacturer-trained respiratory protection supervisors. Recertified respirators have been returned to service; other respirators will be added to the program only after applicable procedures are revised, and training is provided.

Respiratory protection supervision and personnel have received training from manufacturer's representatives on the assembly maintenance and inspection of Draeger and MSA respirators.

Respiratory protection personnel were instructed to complete a Respiratory Equipment Inspection Tag for the individual respirators at the time of inspection. An independent verification program for inspection of the respirators is being developed.

On November 14, 1989, respiratory protection personnel and supervision were instructed in the importance of attention to detail and compliance with established procedures during the performance of their duties and responsibilities.

The Respiratory Protection Program Supervisor duties have been redefined, such that he is now dedicated solely to the respiratory protection program. This will increase supervisory oversight.

3. Corrective steps that will be taken to avoid further violations

Assembly, repair and maintenance training and attendant procedural revisions for the MSA Airline Continuous Flow and MSA Powered Air Purifying respirators will be completed by March 31, 1990. These respirators will not be issued for use until training is provided and procedures are revised.

To ensure that a respirator is functional following assembly, repair, cleaning or maintenance, a respirator testing program will be established by February 28, 1990.

4. Date when full compliance will be achieved

Full compliance was achieved on November 4, 1989, when only certified respirators were available for issuance.

Appendix A to Mr. Scarano's letter, dated December 12, 1989, states in part:

"3. Licensee procedure SO123-VII-2.4, 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 SO123-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."

RESPONSE TO ITEM A.3

1. Reasons for the violation, if admitted

The San Onofre policy with respect to the use of procedures places the responsibility for verification of correct procedure revision with the user. This is clearly stated in the prerequisite section of each procedure which governs quality affecting activities. Notwithstanding this requirement, in this case personnel neglected to perform this verification. Contributing to this failure was the presence of uncontrolled copies of procedures, situated in various plant locations for the convenience of personnel. This apparently led users to incorrectly conclude that it was acceptable to use such files without verification.

2. Corrective steps that have been taken and the results achieved

The evening of November 3, 1989, procedure SO123-VII-2.4, Revision 6, was removed from the respiratory protective device room.

As an interim corrective action, on November 14, 1989, respiratory protection personnel and supervision were instructed in the importance of attention to detail and compliance with established procedures. The directive was augmented by a December 18, 1989 memorandum from the Health Physics Manager to all Health Physics personnel and supervision, emphasizing the requirement to use the current version of procedures.

3. Corrective steps that will be taken to avoid further violations

Since this problem is similar to one contained in a Notice of Violation issued with NRC Inspection Report No. 50-206/88-[illegible], a review is being conducted to determine the extent of this problem at San Onofre. At the conclusion of this review, policies and/or programs will be developed, as appropriate. This review will be completed by February 28, 1990.

By January 15, 1990, the Station Manager will issue a memorandum to all Site personnel, reminding them of their responsibilities regarding the use of current procedure revisions, regardless of the source from which it was obtained.

The Nuclear Oversight Division will increase oversight during routine surveillances for compliance with the new program.

4. Date when full compliance will be achieved

Full compliance was achieved the evening of November 3, 1989, when Health Physics procedure SO123-VII-2.4, Revision 6 was removed from use.