

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION V 1450 MARIA LANE, SUITE 210 WALNUT CREEK, CALIFORNIA 94596

FEB 5 1990

Docket Nos. 50-206, 50-361, 50-362

Southern California Edison Company Irvine Operations Center 23 Parker Street Irvine, California 92718

Attention: Mr. Harold B. Ray, Vice President Nuclear Engineering, Safety, and Licensing

Gentlemen:

This refers to the routine inspection conducted by Messrs. C. W. Caldwell, A. L. Hon, and C. D. Townsend of this office on November 19, 1989 through January 6, 1990 of activities authorized by NRC License Nos. DPR-13, NPF-10 and NPF-15 and to the discussion of our findings held by the inspectors with Mr. R. H. Bridenbecker and other members of the Southern California Edison staff at the conclusion of the inspection.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection resisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

We are concerned regarding the events that led to the hydrogen fire associated with the gaseous radioactive waste system on December 1, 1989, as discussed in paragraph 4.a of the enclosed inspection report. In particular, the fact that work was allowed to proceed with the awareness of an elevated hydrogen concentration (greater than 25%) in the waste gas surge tank indicates a weakness in understanding of fundamental concepts on the part of the operators involved in the evolution. It was fortuitous that no personnel were injured and that there was no damage to equipment from the fire. We have reviewed your letter to Mr. Roy Zimmerman of the Region V staff, dated January 9, 1990 and the detailed report concerning this matter. Due to your extensive efforts in determining a root cause and corrective actions for this event, and due to the minimal severity of the event, we have documented this issue as a non-cited violation, and no further written response is necessary.

Additionally, we are concerned about your use of overtime during outages, as discussed in paragraph 10.a of the enclosed report. While we recognize that the use of overtime during outages may be necessary, we encourage you to carefully consider your policy in this regard, particularly when considering that overlapping unit outages can result in the usage of overtime becoming routine.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A.

Your response to this Notice is to be submitted in accordance with the provisions of 10 CFR 2.201 as stated in Appendix A, Notice of Violation.

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In accordance with 10 CFR 2.790(a), a copy of this letter, the enclosure, and your response will be placed in the NRC Public Document Room.

The response directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely, at alla

A. E. Chaffee, Deputy Director Division of Reactor Safety and Projects

Enclosures:

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1. Appendix A -- Notice of Violation

2. Inspection Report Nos. 50-206/89-33 50-361/89-33

and 50-362/89-33

cc w/Enclosures:

- D. J. Fogarty, Executive Vice President C. B. McCarthy, Vice President and Site Manager (San Clemente) H. E. Morgan, Station Manager (San Clemente) State of California

bcc w/copy of enclosures 1 and 2: Docket File Project Inspector Resident Inspector G. Cook B. Faulkenberry

J. Martin

- A. Johnson
- P. Johnson
- R. Nease, NRR

bcc w/ copy of enclosure 1:

M. Smith

N. Western

J. Zollicoffer

