



Southern California Edison Company

23 PARKER STREET

IRVINE, CALIFORNIA 92718

SO JAN 23 A 9:39

TELEPHONE
714-455-4400

HAROLD B. RAY
VICE PRESIDENT

January 18, 1990

Mr. Roy Zimmerman, Director
Division of Reactor Safety and Projects
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Dear Mr. Zimmerman:

Subject: **Docket No. 50-362**
The Impact of Outage-Related Overtime
San Onofre Nuclear Generating Station, Unit 3

The purpose of this letter is to document a commitment made in discussion with San Onofre Resident Inspectors following a routine, monthly exit interview conducted at the site on January 12, 1990. This commitment was in response to concerns identified by the inspectors with respect to the impact on the normal operation of San Onofre Unit 3 of an overtime program that was implemented during a recent refueling outage of San Onofre Unit 2.

Because of the dual-unit design of San Onofre Units 2 and 3, it is operated and maintained as a single entity with respect to many organizational and management systems. Among these is the system for the management of overtime. For represented employees, the single entity character of the dual units is also reflected in the negotiated working agreement which describes how overtime will be administered.

In planning for the recent refueling of San Onofre Unit 2, Edison sought among other things to respond to employees' concerns about the disruptive effect of unpredictable schedules for the increased levels of overtime, which are always required during an outage, by adhering to a fixed schedule of planned overtime throughout the outage. Although this schedule might result in an increase in overtime hours on the average, because it was fixed and predictable employees were assured that they would not be called in during periods of planned time off, and we believed the increased overtime would have a less negative effect. Edison devoted the additional, available work hours resulting from the fixed overtime schedule, as compared to an as-needed overtime schedule, to activities such as training.

9002230530 900118
PDR ADDCK 05000362
P PNU

110
IE-01

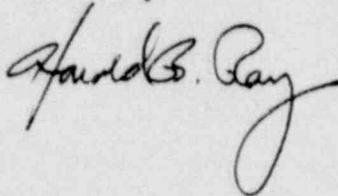
While we believe the fixed overtime schedule did achieve the intended positive result of assuring employees that planned time off would not be disrupted by a call-in, it also obviously had the result that the overtime became routine for the duration of the outage. In addition, because the level of overtime was outage-related, it was in excess of what we consider an appropriate upper limit for an operating unit. Accordingly, as San Onofre Unit 3 was operating normally during the outage, in retrospect we conclude that the fixed overtime schedule was contrary to Technical Specification 6.2.2.f of the Unit 3 Technical Specifications.

At the time the fixed overtime schedule was implemented, Edison did not consider that it represented routine heavy use of overtime, contrary to the Technical Specifications, because the schedule was limited to the duration of the refueling outage, and the duration beyond which heavy use of overtime becomes routine is not defined. However, consistent with my letter to you dated November 16, 1989, Edison intends to conservatively implement the Technical Specifications. Accordingly, in the future we will not schedule heavy use of overtime for the duration of a refueling outage for those personnel addressed by the Technical Specifications assigned to the operating unit.

Recognizing the dual-unit design of San Onofre Units 2 and 3 and our inability to temporarily increase certain critical personnel resources (e.g., licensed operators), we may in the future implement fixed overtime schedules which affect personnel assigned to an operating unit for much shorter durations, but these will be limited to periods when particular evolutions are underway (e.g. startup). Otherwise, we will take steps to ensure that planned outages on either unit do not result in personnel assigned to the operating unit working heavy overtime on a routine basis.

If you have any questions or comments or if you would like additional information, please let me know.

Sincerely,



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