

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Docket Nos. 50-361, 50-362
License Nos. NPF-10, NPF-15

As a result of the inspection conducted March 21 through March 30, 1983, and in accordance with the NRC Enforcement Policy, 10 CFR 2, Appendix C, the following violations were identified.

- A. Technical Specification 3.3.3.8, Radioactive Liquid Effluent Monitoring Instrumentation requires in part that either the Liquid Radwaste Effluent line monitor 2/3 RT-7813 be operable during releases or that at least two independent samples be collected and analyzed and that at least two technically qualified members of the facility staff independently verify the release rate calculations and discharge line valving.

Contrary to the above requirement, between 8:25 p.m. March 23, 1983 and 2:30 a.m. March 24, 1983 approximately 21,224 gallons of liquid containing 9.8 millicuries of radioactive material were discharge via the radwaste effluent line with monitor 2/3 RT-7813 inoperable and two independent samples were not collected and analyzed and two independent discharge valve lineup verifications were not made. Monitor 2/3 RT-7813 was not operable since there was no sample flow through the detector due to a closed isolation valve.

This failure to properly monitor a release of radioactive liquid effluent is symptomatic of two more general conditions. First, plant Piping and Instrumentation Drawings (P&ID) do not show all valves necessary to assure proper component operation. Secondly, some individual component operating procedures fail to provide sufficient specificity to assure that important valves are properly aligned.

This is a Severity Level IV violation (Supplement 1).

The following items relate to the implementation of Proposed Facility Change (PFC) No. 2/3-83-039, which involved installation of a bypass line around the steam generator blowdown processing system.

- B. 10 CFR 20.201, "Surveys", states in part that, "Each licensee shall make or cause to be made such surveys as... (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present." "As used in the regulations in this part, "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present."

Contrary to the above requirement, from March 21 through March 24, 1983 workers were permitted to enter the Unit 2 circulating water discharge seal weir vent shaft and work in the immediate vicinity of the open liquid radioactive effluent discharge conduit and no survey for the presence of radioactive materials had been made to evaluate the extent of radiation hazards present. On March 25, 1983, a worker was permitted to enter a similar area at Unit 3 without a survey first being performed. Subsequent surveys revealed fixed contamination levels up to 100,000 dpm/probe area inside² the open radioactive effluent discharge conduit and up to 8,000 dpm/100cm² removable contamination on the vent shaft walls below the discharge pipe.

This is a Severity Level IV Violation (Supplement IV).

- C. 10 CFR 19.12, "Instructions to workers," states in part that, "All individuals working in or frequenting any portion of a restricted area shall be kept informed of the storage, transfer, or use of radioactive material or of radiation in such portions of the restricted area;...".

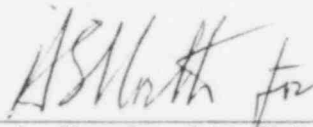
Contrary to the above requirement, between March 21 and March 25, 1983, workers were permitted to enter the Units 2 and 3 circulating water discharge seal weir vent shafts and work in the immediate vicinity of the open liquid radioactive effluent discharge conduit and were not informed of the presence of radioactive materials or of the potential for discharges of liquids contaminated with radioactive material from the open conduit. In addition, the circulating water discharge seal weir vent shafts were not marked or posted with special entrance precautions as required in section 6.2.5.2 of the San Onofre Nuclear Generating Station Health Physics Manual:

This is a Severity Level IV Violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, the Southern California Edison Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

APR 18 1983

Dated


F. A. Wenslawski, Chief
Reactor Radiation Protection Section