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Southern California Edison Company

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April 17, 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. G. P. Yuhas (NRC) to Mr. Harold B. Ray (SCE), dated March 19, 1990

The Reference forwarded NRC Inspection Report No. 90-08 and a Notice of Violation (NOV) resulting from the routine inspection conducted by Mr. K. M. Prendergast during the period of February 26 through March 2, 1990. In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to this NOV.

If you have any questions, or if you require additional information, please let me know.

Sincerely,

Enclosure

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

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TEO!

ENCLOSURE

REPLY TO A NOTICE OF VIOLATION

Appendix A to Mr. Yuhas' letter dated March 19, 1990, states in part:

"A. Technical Specification 6.8.1 requires written procedures to be established, implemented, and maintained covering the Emergency Plan.

Emergency Plan implementing procedure SC123-VIII-0.200, 'Emergency Plan Drills,' Revision 1, dated October 24, 1988, Attachment 1, recolumn a post accident sampling system (PASS) drill to be performed annually.

Contrary to the above, the licensee failed to performed [sic] the annual PASS drill as required by the above stated procedure. The last PASS drill was conducted December 6, 1988.

This is a severity level IV violation (Supplement VIII)."

RESPONSE

1. Reasons for the violation, if admitted

An annual post accident sampling system (PASS) drill, as specified in Station Emergency Plan Implementing Procedure S0123-VIII-0.200, "Emergency Plan Drills," was not performed in 1989. The drill was missed as a result of personnel error involving the failure to follow S0123-VIII-0.200 as written.

A PASS drill had been planned for late 1989, to be held separately from quarterly drills. The intent of this drill was to satisfy all annual and biennial post accident sampling-related requirements of the San Onofre Nuclear Generating Station (SONGS) Emergency Plan.

Following the last quarterly drill on October 23, 1989, an internal request was made to cancel the biennial PASS cask portion of the drill for 1989. In response to this request, the individual cognizant for reviewing drill requirements failed to refer to SO123-VIII-0.200, relying only on a review of the Emergency Plan itself. This Emergency Plan review overlooked the annual post accident sampling procedure drill requirement. Consequently, because a

Reply to a Notice of Violation

biennial PASS cask drill had been completed in December 1988, the 1989 drill was cancelled due to the mistaken belief that only a biennial requirement existed which did not need to be satisfied until 1990.

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

The individual who performed the Emergency Plan review and erroneously concluded that no annual post accident sampling drill requirements existed is no longer employed by SCE; however, in the future, requests for drill cancellation or postponement will be approved by the manager responsible for drill execution.

While investigating the circumstances leading to the missed post accident sampling drill, it was noted that SO123-VIII-0.200 does not contain all appropriate requirements specified in the Emergency Plan. SO123-VIII-0.200, "Emergency Plan Drills," Revision 1, does not address the existence of both post accident sampling-related drills, each having differing frequencies and specifications: the procedures drill (required annually) and the cask drill (required biennially).

In recognition of this procedure weakness, a review of the SONGS Emergency Plan has been initiated to ensure all required drills have been identified and properly characterized in implementing procedures. Upon completion of the review of the Emergency Plan, SO123-VIII-0.200 will be revised accordingly. The Emergency Plan review, and resulting changes to SO123-VIII-0.200, will be completed by May 15, 1990.

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

An annual post accident sampling procedures drill will be completed by May 15, 1990.

4. Date when full compliance will be achieved

Full compliance will be achieved on May 15, 1990, by which time the annual post accident sampling procedures drill will have been completed.