

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-361/81-26

Docket No. 50-361 License No. CPPR-97 Safeguards Group _____

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

Facility Name: San Onofre Unit 2

Inspection at: San Onofre, California

Inspection conducted: September 22 through October 2, 1981

Inspectors: *G. B. Zwetzig* *October 29, 1981*
A. E. Chaffee, Reactor Inspector Date Signed

Date Signed

Approved by: *G. B. Zwetzig* *October 29, 1981*
G. B. Zwetzig, Chief, Reactor Projects Section 1, Date Signed
Reactor Operations Projects Branch

Summary:

Inspection on September 22 through October 2, 1981 (Report No. 50-361/81-26)

Areas Inspected: Routine, unannounced inspection of TMI modifications, preoperational test program and procedures, and proposed Technical Specifications. The inspection involved 54 inspector-hours by one NRC inspector.

Results: Of the three areas inspected, no items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

a. Southern California Edison Company

- *J. Haynes, Manager, Nuclear Operations
- *E. Gault, Clerk-Typist
- *H. Ray, Station Manager
- *B. Katz, Assistant Station Manager, Technical
- *P. Croy, Project Quality Assurance Supervisor
- *C. Welch, Operations Quality Assurance Engineer
- *F. Briggs, Compliance Engineer
- *J. Curran, Manager, Quality Assurance
- *K. Barr, Assistant Station Manager, Health Physics
- *R. Santosuosso, Assistant Station Manager, Maintenance
- *H. Morgan, Assistant Station Manager, Operations
- *W. Marsh, Compliance Engineer
- *M. Short, Shift Technical Advisor Supervisor
- *W. Zintl, Manager, Training
- *P. King, Quality Assurance Engineer
- *C. Horton, Startup Quality Assurance Supervisor
- *D. Stonecipher, Operations Quality Assurance Supervisor
- W. McRory, Unit 2/3 Operator Training Administrator
- M. Scully, Training Services Administrator

b. Nuclear Utility Services (NUS)

- L. Pentecost, Unit 2 Technical Specification Coordinating Engineer
- S. Root, Unit 2 Technical Specification Engineer

c. U. S. Nuclear Regulatory Commission

- E. Weinkam, Licensing Guidance Branch, NRR
- M. Virgilio, Licensing Guidance Branch, NRR

The inspector also interviewed and talked with other of the applicant's employees during the course of the inspection. These included shift supervisor candidates, control room operator candidates, startup engineers, and quality assurance personnel.

*Denotes those persons who attended the exit interview.

Also present at the exit interview was L. Miller, Unit 1 Senior Resident Inspector, and the following NRC region-based inspectors: J. Horner, Reactor Inspector; and G. Yuhas, E. Garcia, and Ray Fish, Radiation Specialists.

2. TMI Modifications

a. TMI Item I.A.1.1, "Shift Technical Advisors (STA)" (Open)

The inspector reviewed the following documents relating to Shift Technical Advisors:

Operating Instruction S023-O-14, Rev. 1, dated June 23, 1981, "Shift Manning."

NUREG-0712, "Safety Evaluation Report for San Onofre Units 2 and 3," Supplements Nos. 1 and 2.

Training Memorandum 7-80, dated December 10, 1980, "Shift Technical Advisor Training and Requalification Program."

Corrective Action Request (CAR) S023-P-41, "Shift Technical Advisor Training Status."

Unit 1 Engineering Procedure S01-V-1.27, Rev. 0, dated February 24, 1981, "Duties, Responsibilities and Authority of the Shift Technical Advisor."

Based on the above review and discussions with licensee personnel, the inspector noted the following:

- (1) The duties of the STAs for Unit 2 have not yet been promulgated by station order as stated in paragraph four, lines six through ten of page 22-3 of NUREG-0712, Supplement No. 1 (SONGS 2/3 SER). The applicant does, however, have a Unit 1 procedure "S01-V-1.27" which specifies the duties of Unit 1 STAs. The applicant plans to use this procedure as the basis for developing the required procedure for Unit 2/3 STAs. The applicant has committed to have the Unit 2/3 STAs procedure complete by October 16, 1981.
- (2) The Unit 2 STAs are scheduled to complete their qualification program by November 30, 1981.
- (3) Independent Safety Engineering Group (ISEG) Staffing: NUREG-0712, Supplement No. 2, "Safety Evaluation Report San Onofre Units 2 and 3," identifies NRR concerns over the experience level of the members of the ISEG. This document describes the acceptable proposal made earlier by the applicant to staff the ISEG with experienced personnel through the use of five relatively experienced STAs from Unit 1 (1.5 to 5.5 years experience, with an average experience of three years) and seven relatively inexperienced STAs from Unit 2 (five have less than one year experience and the other two,

six and seven years experience). Since the time of that proposal, however, only two Unit 1 STAs remain on the staff. These individuals have three to five years experience. To compensate for this loss in Unit 1 experienced STAs, the applicant has initiated an abbreviated training program to provide five Interim STAs at Unit 1. These personnel have experience ranging from 1.5 to 13 years, with an average of 7.7 years. The applicant intends to augment the ISEG with these individuals and other station engineers as necessary, until March 1982, when the next group of Unit 1 and 2 STAs will complete their training. This latter group of STAs will be more experienced than the initially proposed group with an average experience level of 4.3 years. When this group is qualified, the applicant plans to staff the ISEG with fully qualified and experienced STAs. This program was discussed with the responsible reviewer in NRR who indicated this revised proposal was acceptable. This item is closed.

- (4) Shift Staffing: Operating Instruction S023-0-14, Rev. 1, dated June 23, 1981, "Shift Manning," Step 6.1.4, and Attachment 1 erroneously fail to require the presence of an STA when either Units 2 or 3 are in modes 5 or 6 and the other is in modes 1-4. The applicant committed to correct this error by October 15, 1981.

The above items will be reviewed at a future inspection.

No items of noncompliance or deviations were identified.

- b. TMI Item I.A.2.1, "Immediate Upgrading of Operator and Senior Operator Training and Qualifications" (Open)

The inspector reviewed the following documents relating to the above topic:

NUREG-0712, Supplement No. 1, "Safety Evaluation Report for San Onofre Units 2 & 3."

Personal resumes for several cold license candidates.

Based on the above review and discussions with the applicant's personnel, the inspector noted the following:

- (1) The applicant stated that all Senior Reactor Operator (SRO) cold license candidates had either previously held an SRO license or had a minimum of four to five years of Navy Nuclear Power Plant experience.

- (2) No procedure yet exists which describes the requalification and qualification program for licensed operators after the initial cold license process. The applicant has committed to have the requalification program procedure completed by the completion of operator cold licensing. The applicant has further committed to have the initial qualification program procedure completed prior to issuance of the operating license. This item will be followed up at a future inspection.

No items of noncompliance or deviations were identified.

c. TMI Item I.A.2.3, "Administration of Training Program " (Open)

The inspector reviewed the following documents relating to the applicant's proposed Instruction Training and requalification program:

Training Memorandum 3-80, dated December 1, 1980, "Qualification and training of Instructors."

NUREG-0712, Supplement No. 1, "Safety Evaluation Report for San Onofre Units 2 and 3," pages 22-13 through 22-14.

Based on the above review and discussions with the applicant's personnel, the inspector noted the following deficiencies in Training Memorandum 3-80, "Qualification and Training of Instructors":

- (1) The use of periodic onshift assignments as part of instructor training and requalification program as required by NUREG-0712, Supplement No. 1, "Safety Evaluation Report for San Onofre Units 2 and 3," page 22-14, is not addressed.
- (2) The review of documents relevant to station operation by the training staff prior to approval, distribution, and/or implementation as required by NUREG-0712, Supplement No. 1, "Safety Evaluation Report for San Onofre Units 2 and 3," page 22-14, is not provided for in Training Memorandum 3-80.
- (3) Enrollment of instructors in the Institute for Nuclear Power Operations (INPO) Instructor Certification Program is not addressed as required by NUREG-0712, Supplement No. 1, "Safety Evaluation Report for San Onofre Units 2 and 3," page 22-14.
- (4) The requirement, as specified in NUREG-0712, Supplement No. 1, "Safety Evaluation Report for San Onofre Units 2 and 3," page 22-14, for instructors who teach systems, integrated response and transients to be certified by passing an NRC SRO examination is not clearly addressed. This requirement is termed a

"goal" rather than a requirement in this procedure. It is also not clear that this certification is required prior to teaching these specific areas.

The applicant has committed to revise Training Memorandum 3-80 as necessary to address the above deficiencies prior to fuel load.

No items of noncompliance or deviations were identified.

- d. TMI Item I.B.1.2, "Evaluation of Organization and Management Improvements of Near-Term Operating License Applicants" (Closed)

The inspector reviewed the staffing commitments contained in NUREG-0712, Supplement No. 2, "Safety Evaluation Report San Onofre Units 2 and 3." Based on this review and discussions with the applicant's personnel, the inspector concluded that the applicant is making progress towards his goals of increasing onsite and corporate staffing.

No items of noncompliance or deviations were identified.

- e. TMI Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff" (Open)

The inspector reviewed the following documents pertaining to the above subject:

Interim QA Procedure E&C 40-9-19, Rev. 1, dated February 2, 1981, "Review of Operating Experience Reports for SONGS 1, 2 and 3."

Training Memorandum 4-81, dated January 29, 1981, "Feedback of Significant Operating Experience Items into Training Programs."

Twenty-one "Significant Operating Experience Action Sheets" (SOEAS).

Based on the above review and discussions with the applicant's personnel, the inspector noted that the program appears to be adequately defined by procedures. The twenty-one SOEASs, however, indicate that the applicant is having some difficulty in implementing this program expeditiously. Each SOEAS is a control form which assigns responsibility and defines the action (e.g., training) required for each feedback item. Some of the SOEASs reviewed date back to January 1, 1981. The significance of these items

varied, for example; SOEAS 15-81 dealt with "Steam Generator Overfill" and SOEAS 16-81 dealt with Service Water Flooding. The applicant has committed to ensure that all outstanding SOEASs pertaining to Units 2 and 3 will be completed as necessary, prior to operating license issuance. This item will be reviewed at a future inspection.

No items of noncompliance or deviations were identified.

3. Technical Specification Review (Open)

The inspector participated in discussions of Unit 2 proposed Technical Specifications. These discussions included members of the Licensing Guidance Branch (NRR), and representatives of the applicant and their consultant, Nuclear Utility Services. The discussions addressed problems encountered in the current process of adapting the standard technical specifications to Unit 2. Many problems were resolved during these discussions; however, others still need to be addressed. The official "proof and review" copy will not be available until about October 16, 1981. The inspector will review this document when received and forward appropriate comments to NRR.

No items of noncompliance or deviations were identified.

4. Preoperational Test Witnessing (Open)

The inspector witnessed a portion of Preoperational Test 2PE-101-04, Rev. 0, "Containment Isolation." No procedure violations were noted.

No items of noncompliance or deviations were identified.

5. Exit Meeting

The inspector met with the applicant's representatives (denoted in Paragraph 1) at the conclusion of the inspection on October 2, 1981. The applicant's representatives made the commitments contained in Paragraph 2.a at this meeting.