

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-206/82-02

Docket No. 50-206 License No. DPR-13 Safeguards Group

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

Facility Name: San Onofre - Unit 1

Inspection at: San Onofre, California

Inspection conducted: January 25-29, 1982

Inspected: *G.B. Zwetzig for* 2/25/82
J. W. Hornor, Reactor Inspector Date Signed

Approved by: *G.B. Zwetzig* 2/25/82
G. B. Zwetzig, Chief, Reactor Projects Date Signed
Section 1, Reactor Operations Project Branch

Summary:

Inspection on January 25-29, 1982 (Report No. 50-206/82-02)

Areas Inspected: Routine, unannounced inspection of tests and experiments program; procedures; nonroutine reporting program; follow-up of previously identified items and regional office requests; and independent inspection. The inspection involved 36 inspector-hours on-site by one NRC inspector.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

- *W. Moody, Deputy Station Manager
- *J. Curran, Quality Assurance Manager
- *B. Katz, Station Technical Manager
- *P. Croy, Compliance and Configuration Control Manager
- *W. Marsh, Acting Health Physics Manager
- *G. McDonald, Quality Assurance/Control Supervisor
- *F. Briggs, Compliance Engineer
- A. Talley, Materials and Administration Services Manager
- D. McCloskey, Emergency Preparedness Supervisor
- C. Seward, Fire and Safety Administrator
- P. Penseyres, Engineering Supervisor
- M. Wharton, Engineering Supervisor
- V. Salvatore, Shift Technical Advisor
- D. Minton, ASTA Contract Consultant

The inspector also interviewed other licensee and contractor employees during this inspection.

*Denotes those attending the Exit Meeting on January 29, 1982.

2. Followup on Previously Identified Items

- a. IE Bulletin 81-01: "Surveillance of Mechanical Snubbers"
(OPEN)

The licensee's original response to this item was incomplete, and the latest commitment date of December 24, 1981, was not met. The licensee's representative has committed to a new date of February 5, 1982, for supplying the additional information requested.

- b. IE Bulletin 81-03: "Flow Blockage of Cooling Water to Safety System Components" (OPEN)

The licensee's response to IE Bulletin 81-03 did not address the elimination of flow blockage during long term shutdown. The licensee has failed to meet submittal dates of September 15, 1981, and January 11, 1982 with regard to this item. The licensee has now committed to February 12, 1982, for submitting the completed response to this bulletin.

- c. IE Circular 81-03 "Inoperable Seismic Monitoring Instrumentation"
(OPEN)

The inspector determined that the licensee had taken no action with regard to this circular. When this was brought to the licensee's attention, a commitment was made to conduct an evaluation within 30 days (March 2, 1982).

- d. Follow-up Item 81-41-02: "DeLaval Diesel Generator Governor Oil Level Check Procedure" (CLOSED)

The inspector verified that the proper procedure had been incorporated into the Station Procedure for Diesel Generator Operation (S01-10-1).

- e. Follow-up Item 81-41-01: "DeLaval Diesel Generator Replacement of Spherical Washers" (CLOSED)

The inspector verified by review of an internal SCE memo (D. K. Nelson to H. B. Ray, December 18, 1981) and by discussions with NRC headquarters, that an acceptable schedule had been established for replacing the spherical washers.

3. Tests and Experiments Program

The inspector reviewed the following documents pertaining to the Test and Experiments Program:

- a. Quality Assurance Manual, Chapter 11
- b. Station Order S01-A-116, Test Control
- c. Station Order S01-A-122, Review and Internal Communication of Operational and Safety Information
- d. Station Order S01-A-118, Inspection, Test and Operating Status
- e. Form S0(1)57, Routing and Document Control - Unit 1
- f. Meeting Minutes Number 81-66 (June 29, 1981), On Site Review Committee
- g. Procedure S0123-V-4.16, System Pressure Testing
- h. Special Procedure SPE 517, Vent Stack Air Flow Measurement

Based on review of the above documents and discussions with licensee personnel, the inspector determined that except as noted below, the Test and Experiments program appears to conform to regulatory requirements. The exception relates to the fact that the licensee had not prepared written safety evaluations of proposed tests or experiments to support findings made pursuant to 10 CFR 50.59. All such tests and experiments, however, had been reviewed by the On Site Review Committee pursuant to 10 CFR 50.59, and as required by station procedures. The inspector also determined that the licensee has recently identified this deficiency and had written new procedures (S0123-VI-1.0, S0123-G-1, and S0123-A-109) to address this problem. These new procedures are targeted for implementation during the second quarter of 1982. (Note: Subsequent to the inspection the licensee was advised that these procedures must be implemented prior to conducting any further tests or experiments not described in the FSAR.) In view of the licensee's identification of this matter and prompt initiation of corrective action, this item is resolved.

4. Procedures

The inspector examined the following documents pertaining to procedure preparation review and approval:

- a. Division Order D-A-2, Station Orders, Station Procedures, and Operating Instructions
- b. Station Order S01-A-109, Station Documents, and proposed replacement Station Order S0123-A-109, Station Documents
- c. Administrative Procedure S01-XI-1.1, Station Documents - Preparation, Revision, and Review; and proposed replacement Administrative Procedure S0123-VI-1.0, Station Documents - Preparation, Revision and Review
- d. Station Order S01-A-110, Organization and Responsibilities of the On Site Review Committee; and proposed replacement Station Order S0123-G-1, Organization and Responsibilities of the Facility Staff and the On Site Review Committee

The replacement documents listed above are needed to accommodate additional operating units at the station and to define responsibilities as delineated in the proposed expanded station organization. In addition, the inspector found these proposed replacement procedures clarified the assignment of responsibilities and generally upgraded the documents to provide greater assurance of conformance with applicable regulations. (82-02-03)

The inspector reviewed the technical content of the following procedures: S01-13-4, Reactor Plant No. 1 Annunciator, and S01-4-17, Safety Injection System Operations. These procedures were checked against NUREG/CR 1369, Procedure Evaluation Check List, and appeared to be technically adequate.

The inspector examined the records of the OSRC review of procedures and found that some safety-related procedures had not been reviewed within the two year interval recommended by ANSI N18.7. The licensee stated that proposed new organization and control procedures would provide a much improved tracking system and omissions of this review should be minimized when the new system is implemented in the near future. (82-02-04)

The inspector also noted that, as during previous inspections, retrieval of records was frequently time consuming and difficult.

No items of noncompliance or deviations were identified.

5. Nonroutine Reporting Program

The inspector verified that administrative controls have been established for:

- a. Prompt review and evaluation of off-normal operating events to assure identification of safety-related events.
- b. Prompt review of planned and unplanned maintenance and testing activities to assure identification of technical specification violations.
- c. Reporting safety-related operating events internally and to the NRC in accordance with technical specifications.
- d. Completion of corrective action relating to safety-related operating events as appropriate.
- e. Review and evaluation of vendor bulletins and circulars as appropriate.

In addition, the responsibilities for implementing the above listed administrative controls have been established in writing or have been directed by appropriate plant management.

The applicable documents which implement the above controls and which were examined and discussed with licensee representatives were:

- a. Station Order S01-A-132, Incident Investigation
- b. Engineering Procedure S01-V-2.27, Preparation of Station Incident Report Forms
- c. Form SO(1)14, Station Incident Report (SIR)
- d. Station Order S01-A-127, Reporting of Substantial Safety Hazards
- e. Administrative Procedure S01-14-13, Notice to NRC of Significant Events
- f. Form (CAR) Corrective Action Request
- g. Form (NCR) Non Conformance Report
- h. Form (LER) Licensee Event Report

The program and documents were compared against the Technical Specifications, Regulatory Guide 1.16, and 10 CFR and appear to conform to regulatory requirements. The following weaknesses, however, were noted:

- a. Some of the Corrective Action Requests lacked response and closure within appropriate time limits.
- b. Vendor Bulletin and Circular information appear to have an inadequate capture, tracking and closure system.

The licensee acknowledged these findings and stated that a new administrative division, with controls which should eliminate the above problem areas, had already been organized. This division, which is part of an overall station organization (requiring NRR approval), is targeted for implementation in the second quarter of 1982. (82-04-02)

No items of noncompliance or deviations were identified.

6. Follow-up on Regional Requests

- a. Inspection of Seismic Event Monitoring Instrumentation

The inspector questioned the licensee's representative on the surveillance and calibration of seismic instrumentation and found that all activities pertaining to this area were handled on a contract basis. A request for completed surveillance and

The inspector also examined portions of the following plant procedures:

- a. Emergency S01-1.1-1, Emergency Shutdown
- b. Emergent S01-1.2-1, Loss of Coolent
- c. Emergency S01-1.3-2, System Monitoring
- d. Emergency S01-1.4-3, Abnormal Pressurizer Pressure
- e. Emergency S01-1.5-3, Loss of Condenser Vacuum
- f. Emergency S01-1.6-3, Fire i 4KV or Lube Oil
- g. Emergency S01-1.7-1, Station Blackout
- h. General S01-3-6, Operation with Natural Circulation
- i. Primary S01-4-17, Safety Injection System Operation
- j. Secondary S01-7-3, Auxiliary Feedwater System Operation
- k. Diesel S01-10-1, Diesel Generator Operations
- l. Fire S01-11-1, Fire Water and Foam System Operations
- m. Surveillance S01-12.2-9, Weekly Comparison of Excore Detector Offset with Data
- n. Annunciators S01-13-4, Reactor Plant #1 Annunciators
- o. Administrative S01-14-13, Notice to NRC of Significant Events
- p. Maintenance S01-I-1.6, Scheduling of Preventive Maintenance
- q. Administrative S01-VI-1.15, Storm Damage Reporting
- r. Forms PSSO-468, ALARA Evaluation

This examination indicated that the above procedures were complete, had been properly reviewed and approved, and where change notices were attached, the change had received the specified review and approval.

calibration data was referred to the SCE corporate offices. Although the data were unavailable to the inspector during this inspection, the licensee committed to forward the data through the station personnel by February 5, 1982.

The inspector contacted the contractor, Kenometrics Company Inc., and requested information on the company background, personnel qualifications, procedures, and the traceability of standards to the NBS. This information will be forwarded to the inspector by mail.

This item will be examined further during a subsequent inspection.
(82-02-05)

b. Fire Protection Inspection

The inspector interviewed the Fire and Safety Administrator regarding the following items:

- (1) 10 CFR 50 Appendix R-III.G: A proposal for compliance requiring NRC approval has been submitted to NRC (letter dated March 19, 1981, SCE to NRC, No. 81-102). Upon receipt of approval, SCE will comply with the schedule in 10 CFR 50.48.
- (2) 10 CFR 50 Appendix R-III.J: Several letters requesting extension of the compliance date have been submitted to NRC. The current compliance date is February 17, 1982; accordingly, this item will be inspected during the next inspection. In addition, SCE has requested relief from compliance with part of this requirement (emergency lighting inside containment) and is awaiting a response from NRR.
- (3) 10 CFR 50 Appendix R-III.O: The compliance date for Item III.O. is set by the schedule listed in 10 CFR 50.48 and awaits either the correct outage or the next refueling.
- (4) Generic Letter Open Items List (November 24, 1980):
 - (a) 3.1.1 Fire detection systems (2), (3), (4), (6), (7), (8), and (11) were completed on or before their compliance date of November 17, 1981. (Internal memo D. Nelson to K. Baskin SCE November 16, 1981.) Items (9) and (10) require a plant outage and will be completed in accordance with the schedule specified in 10 CFR 50.48.

- (b) 3.1.15 RCP Oil Collection System. This item is the same as the above Appendix R, Item III.0, and will be handled as stated.

- (c) 3.2.1 and 3.2.4 Alternate Shutdown Capability and Cable Spreading Area.

These items are incorporated into Appendix R, Item III.G., above, and will be handled as stated.

- (d) 3.2.3 Turbine Building Structure.

This item is complete (see letter NRC to SCE February 4, 1981, Table 3.2 Item 3).

- (e) 3.2.5 Containment.

This item is governed by the 10 CFR 50.48 schedule and will be completed accordingly (see letter NRC to SCE February 4, 1981, Table 3.2, Item 3.).

These items will be examined further during subsequent inspections. (JH-82-01)

7. Independent Inspection

a. Licensee Response to Generic Letter 81-04 - Station Blackouts

The inspector examined the licensee's new emergency procedure (S01-1.7-1), for coping with a loss of off-site power/station blackout event. The procedure appears to adequately address items a. through g. of the generic letter. The licensee has also instituted training and retraining in mitigating actions to be taken in the event of a station blackout. The inspector finds the licensee's actions in regard to this matter adequate. This item is closed.

b. Failure of Sigma Lumigraph Indicators Model 9270

The inspector found that the licensee had responded to the indicator failure with prompt notification and a followup LER (LER 81-01) as required. The licensee has scheduled the manufacturer's recommended repair of these indicators for the March-April 1982 outage.

8. Exit Meeting

The inspector met with the licensee's representatives (denoted in Paragraph 1) at the conclusion of the inspection on January 29, 1982. The results of the inspection were discussed and the licensee's representatives provided commitments as noted in Paragraph 2. The inspector also discussed the lack of written safety analysis, poor control of vendor data, the absence of some recommended biannual procedure reviews, the timely closing of Corrective Action Requests, and the apparent difficulty in meeting commitments in a timely manner. The licensee's representative agreed that there were problems in these areas but reiterated that the new Compliance and Configuration Control Division (with its management information system) targeted for implementation in the second quarter of this year should solve any future problems in these areas.

