

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company  
San Onofre Nuclear Generating Station,  
Unit 2

Docket No. 50-361  
License NPF-10

As a result of the inspection conducted on February 13 to April 9, 1982, and in accordance with NRC Enforcement Policy, (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982) the following violations were identified:

- A. Technical Specification 6.8.1 states: "Written procedures shall be established, implemented and maintained covering..."
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, recommends, in part, the following procedures: "Instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation should be prepared, as appropriate, for the following systems:

- b. Control Rod Drive System (including part-length rods)"

In accordance with the above requirement, Maintenance Procedure S023-I-3.13, "Control Element Assembly Extension Shaft Coupling," was approved for use on February 11, 1982. Step 6.9 of this procedure requires the following:

"Verify engagement by turning the hand wheel CW until the maximum scale reading, located on the lifting screw assembly is attained and record on the Maintenance Data Record Form, Exhibit B. This numerical scale reading should be approximately 12 higher (24 linear graduations) than that recorded in paragraph 6.5. This difference represents the extension shaft weight."

Contrary to the above, on March 4, 1982, at approximately 11:00 am the inspector observed at least one occasion when an operating crew omitted Step 6.9 of Procedure S023-I-3.13 while latching CEA extension shafts. This is a severity level IV violation. (Supplement I).

In responding to this item, the licensee is requested to address also the potentially causative factors of inadequate supervision, inadequate reference to procedures (relative to training received), and failure to strictly follow instructions relating to recording of data.

- B. 10 CFR 50 Appendix B, Criterion V states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, the licensee's Piping and Instrumentation Drawings (P&IDs) did not show bypass valves which were installed in parallel with valve numbers 16"-022-C and 16" -022-C and certain other large size valves; nor were the bypass valves referenced in the applicable procedures.

As a result, water of various boron concentrations entered the reactor coolant system via the open bypass valve around valve number 16"-022-C from about February 16, 1982 until about March 24, 1982, and identification of the source of the water was impaired because the bypass valves were not shown on the P&IDs available in the Control Room, nor referenced in the applicable procedures.

This is a severity level IV violation (Supplement I).

- C. Operating License NPF-10 section 2.C(19)b states, in part:

"1. SCE shall develop and implement administrative procedures to limit the working hours of individuals of the nuclear power plant operating staff who are responsible for manipulating plant controls or for adjusting on-line systems and equipment affecting plant safety which would have an immediate impact on public health and safety.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

"2. An individual shall not be permitted to work more than 24 hours in any 48-hour period, not more than 72 hours in any seven-day period (all excluding shift turnover time).

"Any deviation from the above guidelines shall be authorized by the station manager, his deputy, the operations manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime will be reviewed monthly by the station manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized."

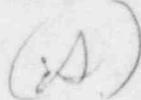
Contrary to the above, from approximately February 24 through March 22, 1982, Unit 2 operating personnel were working more than 72 hours in a seven day period without appropriate management authorization.

This is a severity level IV violation. (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, the Southern California Edison Company is hereby required to submit to this office within twenty-five 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.

APR 23 1982

Dated \_\_\_\_\_

  
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A. Chaffee  
Sr. Resident Inspector