



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE, SUITE 210  
WALNUT CREEK, CALIFORNIA 94596

NOV - 8 1990

Docket No. 50-206

Southern California Edison Company  
Irvine Operations Center  
23 Parker Street  
Irvine, California 92718

Attention: Mr. Harold B. Ray, Vice President  
Nuclear Engineering, Safety and Licensing

Gentlemen:

SUBJECT: EMERGENCY OPERATING INSTRUCTIONS INSPECTION AT SAN ONOFRE  
NUCLEAR GENERATING STATION UNIT 1

This letter forwards the results and conclusions of a special team inspection conducted by the NRC of activities authorized by NRC Operating License No. DPR-13 for San Onofre Unit 1. This inspection was conducted on September 13, 1990 through September 28, 1990. At the conclusion of the inspection, the findings were discussed with Mr. H. E. Morgan and other members of your staff identified in the enclosed inspection report.

The purpose of this inspection was to verify that your Emergency Operating Instructions (EOIs) are technically correct; that the specified actions can be accomplished using existing equipment, controls, and instrumentation; and that the available procedures provide the operators with an effective tool to manage and mitigate potential accidents. The areas examined during the inspection are identified in the attached inspection report. The inspection consisted of a selective examination of procedures, procedure walk-throughs in the plant with operations personnel, and interviews with a broad selection of your operations, procedure writing, and training staffs.

Through direct observation of selected procedures during plant walk-throughs we have concluded that your operating staff can effectively use the EOIs to manage and mitigate serious operational events, and that the EOIs are, for the most part, technically correct.

However, the inspection identified numerous deficiencies in the EOIs, and areas where the verification and validation of the EOIs was not complete. These specific items are described in the enclosed inspection report for your staff to review and correct, as appropriate. These items are based on a relatively small sample of your EOIs. Consequently, as you develop a corrective action plan, we expect that your staff will expand upon this list both qualitatively and quantitatively. General areas that need to be specifically addressed include improving the verification and validation program, and the writer's guide.

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A commitment was solicited and agreed to by your staff to provide notification of the Resident Inspectors if a significant change to an EOI setpoint occurred as a result of an on-going review of instrument loop inaccuracies. It was observed during the Exit Meeting that any change to the EOIs from this review may result in a significant change to the procedures, and thereby warrant further NRC review.

We request that you provide to us, within 30 days of the receipt of this letter, a corrective action plan that addresses the deficiencies identified in the enclosed inspection report and attachment as well as your assessment into why the deficiencies noted were not identified as part of your verification and validation program.

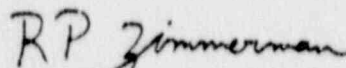
No violations of NRC requirements were identified within the scope of this inspection.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The response requested by this letter and its enclosures is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



R. P. Zimmerman, Director  
Division of Reactor Safety and Projects

Enclosures:

1. Inspection Report 50-206/90-11
2. Attachment A to Report 50-206/90-11

cc w/enclosures (1) and (2)  
D. J. Fogarty, Executive Vice President  
H. E. Morgan, Vice President and Site Manager  
R. L. Krieger Jr., Station Manager  
State of CA

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bcc w/enclosures (1) and (2):

- J. Martin, RV
- G. Johnston, RV
- P. Johnson, RV
- K. Perkins, RV
- R. Zimmerman, RV
- S. Richards, RV
- L. Miller, RV
- L. Kokajko, NRR
- Resident Inspector
- Project Inspector
- M. Smith, RV
- J. Zollicoffer, RV
- Docket File

RV/jk

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO
JOHNSTON <i>JK</i>	LMILLER _____	KIRSCH <i>K</i>	ZIMMERMAN <i>RZZ</i>
11/8/90	11/ /90	11/6/90	11/8/90

SEND TO PDR
YES / NO