

Southern California Edison Company

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L. T. PAPAY
VICE PRESIDENT

August 6, 1982

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SCE

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: R. H. Engelken, Regional Administrator

Dear Sir:

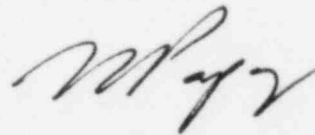
Subject: Docket No. 50-206
IE Inspection Report 50-206/82-19
Response to Notice of Violation
San Onofre Nuclear Generating Station, Unit 1

Mr. H. E. Book's letter of July 7, 1982 issued IE Inspection Report 50-206/82-19 and forwarded a Notice of Violation resulting from the June 14-18, 1982 routine inspection conducted by Mr. G. P. Yuhas.

The enclosure to this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Book's letter of July 7, 1982.

I trust the enclosure responds adequately to all aspects of the Violation. If you have any questions or if we can provide additional information, please let me know.

Sincerely,



Enclosure

cc: L. F. Miller (NRC Site Inspector - San Onofre Unit 1)

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82-317

ENCLOSURE

Response to the Item of Non-Compliance identified in Appendix A to Mr. Book's letter of July 7, 1982.

ITEM

Appendix A to Mr. Book's letter of July 7, 1982 states:

"10 CFR 20.203(c), 'High radiation areas,' states: (1) Each high radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: 'Caution, High Radiation Area.'

"Contrary to this requirement, on June 14, 1982, the area in proximity to the 'C' steam generator at the 19' and 22' elevations of containment had high levels of radiation such that a major portion of the body could have received a dose of 150 mrem in any one hour and was not posted with a sign bearing the words: 'High Radiation Area.'

"This is a Severity Level V Violation (Supplement IV)."

RESPONSE

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

Immediately after the discrepancy was identified by the inspector on June 14, 1982, signs bearing the radiation caution symbol and the words, "Caution, High Radiation Area," were posted pursuant to the requirements of 10 C.F.R. 20.203(c) in proximity to the 'C' steam generator at the 19' and 22' elevations.

Station Health Physics Procedure S0123-VII-7.4, "Posting and Access Control," was implemented on June 24, 1982. This procedure establishes precise posting requirements for High Radiation Areas.

On July 13, 1982 the Unit 1 Health Physics Supervisor issued a memorandum to all Unit 1 Health Physics Technicians containing specific instructions on the posting of High Radiation Areas.

ENCLOSURE (Continued)

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NON-COMPLIANCE

Since the improper posting of the High Radiation Area in the vicinity of the 'C' steam generator is an isolated occurrence and not a symptom of generic system deficiencies, the corrective measures outlined in subparagraph 1 above are sufficient to preclude the repetition of similar instances of non-compliance; however, the Station Health Physics organization will continue to exercise proper supervision to ensure specifically that the provisions of S0123-VII-7.4 are correctly executed.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with the provisions of 10 C.F.R. 20.203(c) was achieved on June 14, 1982 when signs bearing the radiation caution symbol and the words, "Caution, High Radiation Area," were posted in proximity to the 'C' steam generator at the 19' and 22' elevations.