

Southern California Edison Company

SCE

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L. T. PAPAY
VICE PRESIDENT

August 12, 1982

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

Attention: R. H. Engelken, Regional Administrator

Dear Sir:

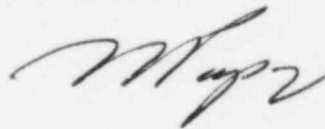
Subject: Docket Nos. 50-361 and 50-362
NRC Inspection Reports 50-361/82-22
50-362/82-12
Response to Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

Mr. D. M. Sternberg's letter of July 14, 1982 issued NRC Inspection Report 50-361/82-22 and 50-362/82-12 and forwarded a Notice of Violation resulting from the June 28 - July 2, 1982 routine inspection conducted by Mr. D. F. Kirsch.

The enclosure of this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Sternberg's letter of July 14, 1982.

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

Sincerely,



Enclosure

cc: A. E. Chaffee (NRC Site Inspector - San Onofre Unit 2)

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ENCLOSURE

Response to the Item of Non-Compliance identified in Appendix A to NRC Inspection Report 50-361/82-22, 50-362/82-12.

ITEM

Appendix A to Mr. Sternberg's letter of July 14, 1982, states as follows:

"The San Onofre Nuclear Generating Station (SONGS), Unit No. 2, Facility Operating License No. NPF-10, dated February 16, 1982, states in paragraph 2.C(2) that, '...SCE shall operate the facility in accordance with the Technical Specifications...'

"The Technical Specifications, Section 6, paragraph 6.8.1.a states that 'Written procedures shall be established, implemented, and maintained covering...the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.'

"Procedure No. S0123-A-130, Revision 0, Station Housekeeping and Cleanliness Control, dated May 6, 1982, prescribed in paragraph IV.D general housekeeping requirements for all zones. Specifically, the following are prescribed.

- Paragraph IV.D.1: "Where smoking is allowed, matches and cigar and cigarette butts shall not be thrown on floors or grounds, but placed in ashtrays or other suitable containers."
- Paragraph IV.D.2: "Spills shall be wiped up as soon as possible."
- Paragraph IV.D.3: "Rags, paper, or other debris shall be placed in suitable waste containers."
- Paragraph IV.D.6: "Hoses, temporary leads, portable gear, tools, etc., shall be properly stored when not in use."

"Contrary to the above requirements, on June 29, 1982, the following violations of procedure requirements were identified:

- An oil puddle was observed covering the base plate of Auxiliary Feedwater Pump P504.
- A welding filler metal rod, hacksaw blade, gasket material, and several nuts/bolts were found lying on the Auxiliary Feedwater Pump Room floor and the pedestals of the Auxiliary Feedwater Pumps.
- A glass container was found in a safety-related cable tray and several pieces of steel scaffolding were lying in about one inch of water at the bottom of a pit at the southeast end of the Auxiliary Feedwater Pump Room.

ITEM (Continued)

- An empty brown bottle, a bottle of cleaner, a piece of tygon tube, and metal strips for attaching lagging were lying in the High Pressure Safety Injection Pump Room No. 005. In addition, an unsecured scaffolding board was lying in the area.
- A hose, paper, and a plastic container were observed to be lying on the floor, in water which had not been wiped up of (sic) the High Pressure Safety Injection Pump Room No. 015.
- A temporary light cord, paper towels, chains, and rags were lying on the floor of the High Pressure/Low Pressure Safety Injection Pump Room No. 002.
- An unused temporary hose was observed in an area housing a Shutdown Cooling Heat Exchanger.
- Unsecured debris consisting of lightbulbs and two metallic covers, each about 1.5 feet by 2 feet, were observed inside of Diesel Generator operating panels Nos. 2L160 and 2L161, each housing nuclear safety-related circuits. In addition, unsecured scaffolding was observed adjacent to the Diesel Generator engines.
- A partially burned cigarette butt was found on the floor of Diesel Generator No. 003 enclosure and a partially burned match was found inside of Diesel Generator No. 002 operating panel No. 2L160. The Diesel Generator buildings are designated as Zone IV by procedure S0123-A-130 and therein defined as restricted areas with regard to tobacco use.
- Several large, unsecured, and improperly stored tool cabinets were observed in the Component Cooling Water discharge area and on the Containment basemat in the vicinity of safety-related equipment."

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

RESPONSE

1. Corrective Steps Which Have Been Taken and Results Achieved

A concerted effort by SCE Station and Project Management during July 2-5, 1982 was made to clean up and otherwise correct the items identified. A restraint was placed on Station Operations to remain in Mode 4 until this was completed. This included a general cleanup of trash and debris, identification of tools, scaffolding and mobile material that could damage safety-related (SR) equipment during a seismic event. Station Engineering made an evaluation of the remaining items that were identified as necessary for the ongoing work projects. These items were secured or placed in areas away from SR equipment.

RESPONSE (Continued)

Station Operations published a memo on July 13, 1982, to all Operations personnel directing them to report debris or any gear adrift regardless of source and to complete Station Housekeeping Form S0(123)-152, "Request for Clean-up Assistance". These forms are forwarded to the Station Housekeeping Coordinator, with a list of action items requiring immediate-need cleanup assistance.

During July 22-24, 1982 a Surveillance of Unit 2 housekeeping was conducted in preparation for initial criticality. This completed the short-term corrective measures in response to the item of non-compliance.

2. Corrective Steps Which Will Be Taken to Avoid Further Items of Non-Compliance

Additional steps that will be taken to avoid further items of non-compliance include upgrading the implementation of relevant Station Orders through organizational agreements, notices, and increased training as follows:

- a. Verbal instructions have been given to work foremen and supervisors stressing daily surveillance of their own work areas for cleanliness. A written memo to this effect will be issued by Startup Maintenance. Work Foremen and Supervisors have been assigned specific areas in Station Order S0123-A-130. In addition, Project Work Foremen and Supervisors are responsible for areas in which they supervise the work.
- b. A joint Project-Station inspection program was begun on July 21, 1982. Areas behind locked doors are inspected once a week. All other areas are inspected twice a week until a more sophisticated scheduling tool is developed.
- c. Both the Project and the Station will conduct formal training on housekeeping.
- d. The Work Order form will be revised by September 1, 1982 to include a verification signature of area cleanup at conclusion of work performed.
- e. The Startup Test Instruction on housekeeping will be revised by September 1, 1982 to bring it into line with the corresponding Station Order S0123-A-130.

RESPONSE (Continued)

- f. Additional efforts have been initiated by the Station and Units 2&3 Project to maintain a high level of cleanliness . These efforts include:
 - 1) Increased surveillance by operators to report deficiencies to Station housekeeping.
 - 2) Until we have an adequate level of confidence in our housekeeping efforts a full time housekeeping inspector has been assigned to make the plant-wide surveillance twice a week addressed under 2.b above. This inspection will identify: a) housekeeping needs, b) maintenance needs, c) areas under construction or modification, and d) items that may be a threat to safety-related equipment during a seismic event. Station administration is coordinating this effort.
- g. A new computerized program is being developed by the Station and will be completed by August 30, 1982. This program will ensure that all areas have cleanliness standards and that housekeeping inspection is scheduled for all areas.

3. Date When Full Compliance Will Be Achieved

Full compliance with the housekeeping requirements of Procedure S0123-A-130, Revision 0, Station Housekeeping and Cleanliness Control, dated May 6, 1982, Paragraph IV.D. has been accomplished and will be an ongoing activity.