

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Units 2 and 3

Docket No. 50-361 and 50-362
License No. NPF-10 and NPF-15

During an NRC inspection conducted on November 18 through December 31, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Criterion V of 10 CFR Part 50, Appendix B, "Instructions, Procedures, and Drawings," states in part that "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..."

1. Procedure S023-3-1.8, TCN 7-16, "Draining the Reactor Coolant System," Step 1.33.3 of Attachment 2, requires personnel to "Adjust the ... CET/HJTC Temperature high - 5 degrees above the present RCS temperature..." and Procedure S0123-0-20, TCN 0-10, "Use of Procedures," Step 6.2.6, requires that personnel adhere to "the sequence of performing procedure steps ..."

Contrary to the above, on December 9, 1993, during a draindown of the Unit 3 reactor coolant system (RCS), two out of four inputs to the CET/HJTC temperature high alarm were not set 5 degrees above the indicated RCS temperature before performing the other steps of the procedure and commencing the draindown.

2. Procedure S0123-0-20, TCN 0-10, "Use of Procedures," Step 6.8.1, states that "Alternately Controlled should be used when a procedure step or section cannot be performed because the associated equipment is being controlled by another plant document."

Contrary to the above, on November 2, 1993, the Unit 3 common emergency core cooling system miniflow isolation valve, 3HV9347, was alternately controlled when releasing Work Authorization Record 3-R7PP111, "Safety Injection Pumps Miniflow Overhaul," even though the associated equipment (valve 3HV9347) was not being controlled by another plant document.

3. Procedure S0123-XV-5.1, Revision 1, "Temporary Modification Control," Step 6.3.1, states that, "If leak repair will be in this manner (Furmanite or equivalent) on safety related, QCI and QCII, important to safety ...components the approval/documentation shall be by the NCR process."

Contrary to the above, on November 4, 1993, Unit 2 valve S21301MU1000, a safety-related quality class II steam trap isolation

valve, was repaired for a body-to-bonnet steam leak using Furmanite without approval by the NCR process.

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

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Senior Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an order or a Demand for Information as to why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 28th day of January, 1994