

Southern California Edison Company

P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

DAVID J. FOGARTY
EXECUTIVE VICE PRESIDENT

August 13, 1982

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TELEPHONE
213-572-2796

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

Attention: Mr. R. H. Engelken, Regional Administrator

Dear Sir:

Subject: Docket No. 50-206
Management Control of Surveillance Activities
IE Inspection Report 50-206/82-20
San Onofre Nuclear Generating Station, Unit 1

Reference: Letter, D. M. Sternberg (NRC) to L. T. Papay (SCE)
dated July 14, 1982, "NRC Inspection - San Onofre Unit 1"

IE Inspection Report 50-206/82-20, issued as an enclosure to the reference, cited four instances of missed surveillances or reports as evidence of lack of adequate management control of surveillance activities. Pursuant to the request contained in the reference, SCE has re-examined these occurrences, both individually and as a group, to determine whether the need exists for any further corrective action.

SPECIFIC ITEMS

The first instance involved missed monthly manual channel tests of the containment isolation valves, containment purge and exhaust valves, and pressurizer power operated relief valves as required by Technical Specifications 4.1.1 and 4.1.6. These required tests were not performed during the period beginning December 17, 1981 and ending February 18, 1982. This problem was identified by SCE and reported in Licensee Event Report (LER) 82-011. The missed tests were identified by Station and Quality Assurance personnel during followup reviews which were planned by Station management specifically to verify implementation of proper controls.

The second instance involved an incomplete surveillance of the spray/sprinkler system required by Technical Specification 4.15.B.(2). This surveillance lapse dated from September 15, 1980 to June 11, 1981. The problem was identified by SCE and reported to the NRC by Special Report dated April 23, 1982. The incomplete surveillance was identified as the result of a periodic records review performed by the Quality Assurance organization.

The third instance involved the 4160 volt switchgear room fire detectors not being tested in July, 1981 as required by Technical Specification 4.15.D.(1). This instance was identified in a Quality Assurance records review and was the subject of a Special Report, dated June 16, 1982.

The fourth instance involved the late reporting of inoperability of a fire detector for the sphere enclosure building (Zone 16) which repeatedly alarmed when triggered by nearby construction activities or weather conditions. SCE investigated and prepared a Special Report on this matter which was sent to you on July 14, 1982.

CORRECTIVE ACTION SUMMARY

Our previous review of the instances cited above led to the conclusion that surveillance and other requirements established in license amendments and surveillance requirements now existing in the Technical Specifications were not being systematically reflected in Station procedures. In addition, inasmuch as three of the four cited instances involved fire protection equipment surveillance, corrective action to prevent missed or overdue reporting of fire protection equipment surveillance and operability status was also considered necessary. The four cited instances led to the initiation of corrective action reflected in the individual prompt and followup reports for the identified reportable occurrences and summarized below:

1. A Station procedure which requires the detailed review of all license amendments issued by the NRC for San Onofre will be implemented by September 1, 1982. This detailed review will include the specific assignment of responsibility to Station or other Company organizations for completion of activities mandated by license amendments.
2. A summary of all Technical Specification surveillance requirements will be issued as a series of Station Orders. These orders will list departmental responsibilities, test requirements by plant mode, and the required test intervals to preclude misunderstanding of the Technical Specifications. These Station Orders will be published about August 31, 1982.

3. To prevent missed or overdue reporting of fire protection equipment surveillance and operability status:
 - a. All status keeping, scheduling and reporting responsibilities associated with fire protection systems have been unified within Station Emergency Preparedness. This includes fire protection system operability, surveillance, maintenance, repairs and reporting.
 - b. New Station Procedure S0123-XIII-26, "Fire Protection Impairment," was issued on July 12, 1982. This procedure provides a cross reference to Technical Specification requirements and will result in prompt consideration of the need for compensatory measures and reporting as required by the Technical Specifications.
 - c. On July 22, 1982 new Station Procedure S01-I-1.4, "Maintenance Order Preparation, Use, and Scheduling", which incorporates the use of a Maintenance Order Tracking Log, was issued. This will ensure that maintenance on important systems is not delayed.
 - d. All fire detection, fire suppression, and sprinkler systems have been inspected to establish their current status and verify compliance with the Technical Specifications. This inspection was completed on July 9, 1982.

Since the issuance of the several Special Reports, the Licensee Event Report, and the response to the Notice of Violation involved in these four individual instances, additional corrective actions have been initiated including:

4. The Maintenance Department has created a dedicated Technical Specifications preventive maintenance and surveillance team along with a dedicated foreman to insure that matters of this kind receive appropriate priority.
5. Station Emergency Preparedness has completed a review of the present and proposed Unit One Fire Protection Technical Specifications. This review included reviewing currently implemented Maintenance and Operations procedures for compliance with the Fire Protection Technical Specifications. As a result, additional revisions to both Maintenance and Operating procedures are underway.

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SCE

Our review of this matter in response to the referenced letter, considering corrective actions initiated as summarized above and considering the fact that most of the identified problems predate our efforts to create and fully staff Station Compliance and Emergency Preparedness organizations, leads to the following conclusions:

1. The instances cited represented a pattern of missed surveillance and reports indicative of Technical Specification requirements being inadequately reflected in Station procedures and inadequate clarity of responsibility within Station organizations.
2. Identified corrective actions, in connection with the planned further development and staffing of Station organizations (particularly Compliance and Emergency Preparedness) are sufficient to prevent recurrence of such a pattern.

In order to verify these conclusions, SCE will conduct a comprehensive Quality Assurance audit with special emphasis on the implementation and effectiveness of measures identified above. This audit, to be completed by November 1, 1982, will be reviewed by Station Management to determine the need for any additional action.

As the corrective actions identified in this letter progress and are completed, Station management will evaluate their effectiveness and implement program changes as needed to assure adequate control over Technical Specification surveillances and reporting. If you have any questions concerning the above, please contact me.

Sincerely,

