

Southern California Edison Company

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VICE PRESIDENT

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SCE

REGIONAL TELEPHONE
213-572-1474

July 28, 1982

U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 260
Walnut Creek, CA. 94596-5368

ATTENTION: Mr. T. W. Bishop, Chief
Reactor Construction Projects Branch

Dear Sir:

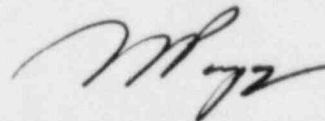
SUBJECT: Docket No. 50-362
NRC Inspection Report 50-362/82-11
San Onofre Nuclear Generating Station, Unit 3

Your letter of June 29, 1982 forwarded a Notice of Violation resulting from the May 24-28, 1982 inspection conducted by MESSRS: G. Hernandez and W. J. Wagner.

Enclosure (1) of this submittal provides our response to the Notice of Violation contained in Appendix A of that letter.

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: A. E. Chafee (NRC Site Inspector)

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Q PDR

ENCLOSURE I

Response to the Item of Non-Compliance identified in Appendix A to IE Inspection Report 50-362/82-11.

ITEM

"10CFR50, Appendix B, Criterion V, as addressed in paragraph 5.1 of the Quality Assurance Program in Appendix A of the PSAR, states in part: "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, or drawings..."

The configuration for the field welding of the Unit 3 Shutdown Heat Exchanger upper seismic restraint members to the wall anchor plates is detailed in Section E of Bechtel Civil Drawing No. 23623, Rev. 11.

Contrary to the above, as of May 24, 1982, the as-built configuration for three upper seismic restraints did not conform to that specified in the drawing in that each restraint member had an added filler plate between the channel restraint member and the wall anchor plate. Subsequent calculations by Bechtel civil/structural engineers determined that the installation would not perform its safety function under postulated accident conditions. This installation was completed and inspected on or about December 7, 1978.

This is a Severity Level IV Violation (Supplement II).

RESPONSE

I. CORRECTIVE ACTION WHICH HAS BEEN TAKEN AND THE RESULTS ACHIEVED

NCR C-3079 was issued to address the added filler plate between the channel restraint member and the anchor plate. BPC Project Engineering has evaluated the "as-built" upper seismic restraint that supports S3-1206-ME-004 (shutdown heat exchanger) and confirms that the two (2) restraints on the east wall are acceptable and has given approval for them to remain as is. The shim plates that were added do not compromise structural integrity or intended engineering function. Evaluation of the restraint on the south wall revealed that the connection would require repair. The shim plate was removed and the connection was fabricated to section D on dwg. 23623-11. SCE/QA witnessed the removal of the shim plate, obtained a sample coupon, and forwarded it to the NRC for material testing. NRC C-3079 has been completed and closed on 7-14-82.

In addition, BPC Quality Control performed a visual inspection to verify hardware/drawing configuration control for 100% of Unit 3 equipment seismic restraints. The following equipment were inspected. No discrepancies were noted.

- 1) Unit 3 steam generator ME-089 under snubber dwg's S023-915-45-4, S023-917-1-3, DCP 3-38N, FCR C-1093, FCR C-4018.
- 2) Unit 3 diesel generator exhaust silencer, MF-4, dwg's S023-403-12-5, 23850-19.
- 3) Unit 3 pressurizer, E-087, seismic restraints at 75' elevation, dwg 23210-6.
- 4) Unit 3 reactor coolant pump, P-004 seismic restraints, dwg 23207-9, 23180-5.
- 5) Unit 3 shutdown heat exchanger, E-004, seismic restraints, dwg 23623-11.
- 6) Unit 3 reactor vessel seismic restraints dwg 2300-7, (note: installation incomplete as of 6-7-82, scheduled completion subsequent to hot functional testing.
- 7) Unit 3 boric acid make-up tank, T-071, seismic restraints dwg 25012-10.
- 8) Unit 3 safety injection tank, T-010, seismic restraints dwg 23223.

2. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER ITEMS OF NON-COMPLIANCE

This is considered an isolated and unusual situation. A notification by memo was given to the cognizant department and their respective field engineers of the nonconforming condition to emphasize the requirement that ALL work must be in accordance with previously approved drawing and/or procedures. Notification was made on 5-13-82 by BPC IOM P-794 (I).

3. DATE BY WHICH FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 7-14-82 when NCR C-3079 was closed.