

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Docket No. 50-206
License No. DPR-13

As a result of the inspection conducted during the period July 19-23, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violation was identified:

Facility License Condition 3.H states in part:

"The licensee is required to implement the administrative controls identified in Section 6 of the SE." (Note: SE refers to the NRC's Fire Protection Safety Evaluation, dated July 19, 1979, issued as part of Amendment 44).

Section 6 of the SE states in part:

"We (the NRC) have...recommended that the licensee's administrative controls follow the NRC guidelines set forth in "Nuclear Plant Fire Protection, Functional Responsibilities, Administrative Controls, and Quality Assurance." ...on July 13, 1978, the licensee accepted the staff positions on administrative controls."

To implement these administrative controls, Station Order S0123-A-133, Fire Protection Plan, and several supporting procedures were issued. Specifically, the Fire Protection Plan and supporting procedures prescribe the following:

- . Fire Protection Procedure S0123-XIII-13 (Revision 0), paragraph 6.2.3 states: "All wood used in safety related areas shall be treated with a flame retardant material."
- . Fire Protection Procedure S0123-XIII-13 (Revision 0), paragraph 6.4.7 states in part: "At the completion of the work task or at the end of the shift, each employee shall clean up the work area, including all oil spills and dispose of materials properly...."
- . Fire Protection Procedure S0123-XIII-13 (Revision 0), paragraph 6.2.2 states: "The Manager of Station Emergency Preparedness, or his designee, shall be consulted before significant amounts of combustibles are temporarily (longer than 24 hours) stored in safety related areas, as might be necessary during maintenance operations or modifications. Additional fire prevention steps and/or manual fire suppression equipment required by the Manager, Emergency Preparedness shall be implemented prior to storing the combustibles."

- . Fire Protection Procedure S0123-XIII-13 (Revision 0), paragraph 6.6.2 states: "Every trailer, when possible shall be separated from other trailers or plant buildings and equipment by a distance of at least thirty feet unless protected with automatic sprinklers."
- . Fire Protection Procedure S0123-XIII-26 (Revision 0), paragraph 4.0 states in part:
 - "4.1 Before the request for removal of a Fire Protection System from service can be approved, ...a member of the Station Fire Protection Staff...(will) complete Attachment 8.1 of this procedure...."
 - "4.3 Impairment of fire protection equipment includes the removal for maintenance and/or repair of:..."
 - "4.3.5 Other impairments judged by the Supervisor of Fire Protection to adversely affect the safety levels of the Station as stipulated by the Operating License."
- . Station Order S0123-A-130 (Revision 0), paragraph IV.D.7 states: "Trash and debris shall not be allowed to accumulate in any area and as a minimum shall be removed to the larger outside trash receptacles once per working shift in areas of high activity and as appropriate in other areas. Cleaning and pickup personnel shall be assigned by work supervisors to ensure that areas are kept clean during activities rather than at the completion of the activities only."

Contrary to the above requirements the following conditions were identified:

- . Wood, which showed no evidence of having been treated for fire retardance, was observed in structures located adjacent to the sphere enclosure building and within the auxiliary building.
- . Oily rags, combustible debris and oil spills were observed in the Lube Oil storage shed when no work was in progress.
- . Significant quantities (greater than 100 pounds) of combustible materials (filter materials and associated cartons) were found stored beneath the stairs in the lower level of the auxiliary building, and there was no evidence of prior implementation of additional fire protection measures.
- . Several construction sheds and trailers not protected by automatic sprinklers were observed to be located within thirty feet of plant buildings and equipment.
- . Two sets of emergency lights required by 10 CFR 50, Appendix R, Section III.J, located in the 480 Volt Room (Cable Spreading

Room) had been removed from service and Attachment 8.1 to the procedure had not been completed.

- . A large accumulation of refuse was present in the Spent Fuel Storage Building adjacent to the cask handling area.

The failure to follow the requirements of the Fire Protection Procedures is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

AUG 12 1982

Date

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D. F. Kirsch, Chief
Reactor Projects Section 3