APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Nuclear Generating Station,
Unit 2

Docket No. 50-361
License No. NPF-10

As a result of the inspection conducted on July 3 - August 19, 1982 and in accordance with NRC Enforcement Policy, (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982) the following violation was identified:

A. Technical Specification 6.8.1 states: "Written procedures shall be established, implemented and maintained covering...

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978." Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978 recommends, in part, the following procedures:

"3. Procedures for Startup, Operation, and Shutdown of Safety-Related PWR Systems

Instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation should be prepared, as appropriate, for the following systems:

b. Auxiliary Feedwater System"

In accordance with the above requirement, Operating Instruction SO23-2-4 "Auxiliary Feedwater System Operation" Revision 3, including Temporary Change Notices 4 and 5, was approved for use on May 17, 1982.

This procedure describes two modes of operation for feeding the steam generators. Step 6.2.4 describes the flow path and control mode for feed rates greater than 200 gpm to a generator. Step 6.5 describes the allowed flow path for flow rates less than 200 gpm to a generator. Neither of these flow paths include reverse flow through Kerotest valves 553 or 154.

Contrary to the above, on May 27, 1982, at approximately 4 p.m., the operators placed the auxiliary feedwater system in an unauthorized lineup which included reverse flow through Kerotest valve 154. This lineup resulted in overstressing of the auxiliary feedwater cross-connect piping due to vibration induced metal fatigue. In the following weeks, during further follow-up testing and normal operation of the system, the overstress eventually contributed to two weld failures in the crossover line vent piping and the failure of valve 154.

At the time of this occurrence the operators and other staff personnel were not aware of the damage this unauthorized lineup would cause. However, certain staff personnel, including the operators, were aware that reverse flow through Kerotest valves was unpredictable. Further, the operators were aware that backflow through Kerotest valves was to be avoided when possible.

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 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.

Dated: AUG 31 1982

D. F. Kirsch, Chief
Reactor Projects Section 3

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1450 MARIA LANE, SUITE 260
WALNUT CREEK, CALIFORNIA 94596

August 31, 1982

Docket Nos. 50-361
50-362

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

Attention: Dr. L. T. Papay, Vice President
Advanced Engineering

Gentlemen:

Subject: NRC Inspection of San Onofre Units 2 and 3

This refers to the routine, monthly inspection conducted by Messrs. A. Chaffee, G. Johnston and J. Carlson of this office on July 3 - August 19, 1982, of activities authorized by NRC License No. NPF-10 and Construction Permit No. CPPR-98 and to the discussion of our findings held by Mr. A. Chaffee with Mr. H. B. Ray and other members of the Southern California Edison staff at the conclusion of the inspection on August 13, 1982.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel and observations by the inspector.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A.

Your response to this notice is to be submitted in accordance with the provisions of 10 CFR 2.201 as stated in Appendix A, Notice of Violation.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

T. W. Bishop

T. W. Bishop, Chief
Reactor Projects Branch No. 2

Enclosures:
A. Notice of Violation
B. NRC Inspection Report
No. 50-361/82-25
50-362/82-16

cc w/o enclosure
R. Dietch, SCE

cc w/ enclosure
H. B. Ray

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Dated: August 31, 1982

D. F. Kirsch, Chief
Reactor Projects Section 3