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**Southern California Edison Company**

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January 28, 1983

**L. T. PAPAY**  
VICE PRESIDENT

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NRC

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SCE

REGION V TELEPHONE  
213-572-1474

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  
IE Inspection Report No. 50-206/82-36  
Response to Notice of Violation  
San Onofre Nuclear Generating Station, Unit 1

Reference: a) Letter, H. B. Ray (SCE) to F. Wenslawski (NRC),  
Confirming Action Letter, dated October 27, 1981  
b) Letter, L. T. Papay (SCE) to R. H. Engelken (NRC),  
Response to Notice of Violation, dated January 15, 1982

Mr. G. S. Spencer's letter of December 29, 1982, issued IE Inspection Report 50-206/82-36 and forwarded a Notice of Violation resulting from the November 29 through December 3, 1982, Unit 1 routine inspection conducted by G. Yuhas. The enclosure to this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Spencer's letter.

In addition, in response to the request made in Mr. Spencer's December 29, 1982, letter, this letter also provides information concerning the current status of specific items identified in Inspection Report 50-206/82-36 which were originally addressed in references a) and b). Following the submittal of references a) and b), our continuing review of the Operational Radiation Monitoring System (ORMS) permitted by several delays in the anticipated return to service of Unit 1 has resulted in the need for reassessment of the commitments contained in references a) and b). The results of this reassessment, including revision of commitments made in references a) and b), will be provided by May 1, 1983. In the meantime, the current status of the specific items requested in Mr. Spencer's December 29, 1982, letter is as follows:

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PDR ADOCK 05000206  
Q PDR

Item 50-206/82-36-01: Reference b) indicated that effluent training would be fully implemented by July 1, 1982. This training will now be completed prior to return to service of Unit 1.

Item 50-206/82-36-02: Reference b) indicated that Station Procedures S01-III-5.3.0, "Effluent Reports and Records," and S01-III-5.3.1, "Semi-Annual Report," would be implemented by February 28, 1982. Reference b) further indicated that the program represented by Station Procedure S01-III-5.4.0, "Inspection and Surveillance," would be fully implemented by July 1, 1982. Procedure S01-III-5.3.0 and S01-III-5.3.1 have been renumbered as Procedure S01-III-5.30.1 and S01-III-5.60.1, respectively, and are in final review. These procedures are expected to be issued by March 1, 1983. Subsequent to the issuance of references a) and b), in lieu of issuing Procedure S01-III-5.4.0, Station Chemistry revised applicable individual procedures to incorporate the elements of S01-III-5.4.0. These procedures were issued in July, 1982.

Item 50-206/82-36-04: Reference a) indicated that an engineering review of the downscale failure of the ORMS channels would be conducted and tests completed by November 15, 1981. Such a review and testing were completed by November 15, 1981. The results of this review and testing are being considered in connection with the broader reassessment of commitments contained in references a) and b) and conclusions will be presented by May 1, 1983.

Item 50-206/82-36-05: Reference b) indicated that a facility modification enabling monitor R-1219, instead of monitor R-1214, to control the Waste Gas Discharge Valve SV99 would be made when satisfactory operation of monitor R-1219 is demonstrated. This facility modification is being evaluated in connection with the broader reassessment of commitments contained in references a) and b) and conclusions will be presented by May 1, 1983.

Item 50-206/82-36-06: Reference a) indicated that liquid radwaste monitor R-1218 would be re-evaluated and upgraded. Upgrading of R-1218 will be considered in connection with the broader reassessment of commitments contained in references a) and b), and conclusions will be presented by May 1, 1983.

With respect to your expressed concern over the ability of lower management levels to effectively follow through with commitments made by higher management, the following information is provided:

To assure that commitments made to the NRC are properly implemented and that management is able to apply appropriate attention to these commitments, the Configuration Control and Compliance Department, created in late 1981, has initiated a computerized Commitments Register (an action item tracking system). The Commitments Register now includes items identified during NRC inspections and related correspondence. During the period when the referenced letters were issued, this new system was not yet operational and the previously implemented action item tracking system was not functional.

Mr. R. H. Engelken

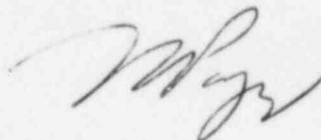
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SCE

To verify that our new Commitments Register contains commitments to the NRC made during this time frame, a review of all correspondence from the fourth quarter of 1981 to the present is being undertaken. This extensive review of correspondence to and from the NRC will, upon completion, ensure effective follow-through, controlled by Station Management.

If you have any additional questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'M. J. ...', written in a cursive style.

Enclosure

cc: L. Miller (USNRC Resident Inspector - San Onofre, Unit 1)

## ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. G. S. Spencer's letter dated December 29, 1982.

### ITEM A

Appendix A to Mr. Spencer's letter states:

"Technical Specification 4.6E states: 'The stack gas and particulate monitors shall be calibrated at a minimum frequency of once every six months, and normal response of each monitor shall be tested weekly.' In addition, Chemical Procedure S01-III-5.1.0, 'Calibration Schedule and Requirements for the ORMS' require radioactive material transfer calibrations for each channel at least every six months.

"Contrary to this (sic) requirements, the stack gas and particulate monitors, were not calibrated at least every six months in accordance with S01-III-5.1.0 during the period January through November 1982.

"This is a Severity Level IV Violation (Supplement I)."

### RESPONSE

#### Corrective Steps Which Have Been Taken and the Results Achieved

Upon identification of this item by the NRC, monitors R-1212, R-1215, R-1216, R-1217, R-1219, R-1220 and R-1221 were calibrated by January 5, 1983.

Calibration of monitor R-1214 cannot be performed until monitor R-1211 is calibrated. A leaking gasket in monitor R-1211 has delayed its calibration. A new gasket is being fabricated. Calibration of monitors R-1211 and R-1214 will be performed after replacement of the gasket.

#### Corrective Steps Which Will Be Taken To Avoid Further Items of Noncompliance

Station Procedure S01-XV-3.0, "Technical Specification Surveillance Program," has been revised to clearly identify the frequency of, and responsibilities for calibration of effluent monitors. This will ensure the six months calibration frequency requirement is met.

#### The Date When Full Compliance Will Be Achieved

Full compliance will be achieved when monitors R-1211 and R-1214 are calibrated. This will be completed no later than the restart of Unit 1.