



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

W.A.P. - 8 1994

Docket Nos. 50-361 and 50-362

Southern California Edison Company
Irvine Operations Center
23 Parker Street
Irvine, California 92718

Attention: Mr. Harold B. Ray, Senior Vice President, Power Systems

SUBJECT: REPLY TO SCE RESPONSE TO NOTICE OF VIOLATION
(NRC INSPECTION REPORT 50-361,362/93-31)

Your letter of January 17, 1994, informed us of the steps you have taken to correct the first of the four examples of a violation identified in the Notice of Violation (Notice) and Inspection Report Nos. 50-361/93-31 and 50-362/93-31 issued on December 17, 1993. In addition, your letter disagreed with our conclusions related to examples 2, 3, and 4 of the violation in the Notice and requested that we re-evaluate the violation and the assigned severity level in light of the additional information you provided.

We have reviewed the additional information provided since the initial inspection, conducted additional inspections to confirm certain statements of fact, and have reassessed our conclusions. Based on the additional information, examples 2, 3, and 4 of the violation in the Notice are hereby withdrawn. You did not contest example 1 of the violation. A restatement of the examples of the violation, a summary of the SCE comments, and the bases for our conclusions are presented in Enclosure 1. We re-evaluated the severity level of the remaining violation and conclude that the severity level should be revised to Severity Level V. Therefore, the violation should be considered a non-cited violation because the criteria in Paragraph VII.B(1) of Appendix B to 10 CFR Part 2 were satisfied. Our records will be revised to reflect this.

Your corrective actions will be verified during a future inspection. Should you have any questions concerning this letter or inspection, we will be pleased to discuss them with you.

Sincerely,

C. A. VanDenburgh, Acting Deputy Director
Division of Reactor Safety and Projects

Enclosure: NRC Response

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cc w/enclosure:

Mr. Edwin A. Guiles, Vice President Engineering & Operations, San Diego Gas and Electric Co.

T. E. Oubre, Esq., Southern California Edison Company
Chairman, Board of Supervisors, County of San Diego

Mr. Sherwin Harris, Resource Project Manager, Public Utilities Department

Mr. Charles B. Brinkman, Manager, Washington Nuclear Operations, ABB
Combustion Engineering Nuclear Power

Mr. R. W. Krieger, Vice President, Nuclear Generating Station, Southern
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Mr. Don J. Womeldorf, Chief, Environmental Management Branch

Mr. Thomas E. Bostrom, Project Manager, Bechtel Power Corporation

Mr. Robert G. Lacy, San Diego Gas and Electric

Mr. Steve Hsu, Radiologic Health Branch

Mayor, City of San Clemente

Enclosure 1

NRC RESPONSE TO SOUTHERN CALIFORNIA EDISON LETTER

EXAMPLE 1: Violation -

Procedure SO123-0-13, TCN 0-24, "Technical Specification Limiting Condition for Operability Action Requirement and Equipment Deficiency Mode Restraints (LCOAR/EDMRs)," Attachment 4, Step 14, states that, "Tags are placed to identify the affected system or component...LCOAR/EDMR tags should be used for this purpose."

Contrary to the above, activities were not accomplished in accordance with procedures when on November 16, 1993, an EDMR/LCOAR tag was found posted in the Unit 3 Control Room for Nuclear Indication Startup Channel "A" indicating that Startup Channel "A" was out-of-service, when the Startup Channel was in-service, and not affected.

Southern California Edison (SCE) Comments:

SCE agrees that a violation occurred when the Limiting Condition for Operability/Equipment Deficiency Mode Restraint (LCOAR/EDMR) tag was not removed as required and by procedures. Corrective actions to remove the tag and discussion with the personnel were held regarding the need for attention to detail.

NRC Staff Conclusion:

This violation example is appropriate.

EXAMPLE 2: Violation -

Procedure SO123-I-1.7, TCN 4-12, "Maintenance Order Preparation, Use, and Performance," Step 6.15.1.2 states that, "Work packages, including maintenance orders and procedures, must be followed in procedural compliance...." The procedure allows steps to be performed out-of-sequence under certain conditions.

Contrary to the above, as of November 16, 1993, Maintenance Order 93100709000, "High Pressure Safety Injection Flow Indication Indicates Flow With Shutdown Cooling Inservice," was not followed when a step to remove a deficiency tag for Unit 3 HPSI Flow Indicator 3FI03112 was performed out-of-sequence. The maintenance order did not provide exceptions for performing the steps out-of-sequence, nor were the conditions met for performing the steps out-of sequence.

Southern California Edison Comments:

SCE states that on November 16, 1993, an SCE worker noted during the performance of a maintenance order (MO) that a deficiency tag specified in the MO to be removed, was no longer present. The worker appropriately documented this fact. SCE was not able to determine how or when the tag was lost or removed. SCE states that the deficiency tag was an administrative aid and that the absence of the tag did not constitute a procedural violation.

NRC Staff Conclusion:

The NRC staff recognizes that appropriate steps were taken when the SCE worker identified that the deficiency tag was no longer present. While the NRC staff recognizes that the tag provides an important visual aid to the operator to identify that deficient indicators or controls are being tracked, the staff also understands that the tags are administrative in nature. Based on the low safety significance of this issue in that the flow indicator involved, while being safety-related, was not required in the operating mode at that time and that it is uncertain if the tag had been removed or had inadvertently fallen off, we are withdrawing this example of the violation.

EXAMPLE 3: Violation -

Procedure S023-I-3.1, TCN 6-23, "Minor Refueling Procedures," Step 6.1.1.4.3, states that, "Lanyards need not be attached to wiping materials taken into the area as long as ... the wipes are held or otherwise controlled."

Contrary to the above, activities were not accomplished in accordance with procedure S023-I-3.1, TCN 6-23, as of October 20, 1993, when a material wipe was not held or otherwise controlled and fell into the Unit 3 refueling cavity.

Southern California Edison Comments:

SCE states that a fuller statement of the procedure is that "...as long as: (1) retrieval equipment is 'immediately' available should a wipe fall into the pool, and (2) the wipes are held or otherwise controlled,..." SCE states that the intent of the procedure was to have wiping material held or otherwise controlled, but also recognized the possibility of dropping a wipe, for which retrieval equipment was available. SCE states that the retrieval equipment was used to divert the wipe from the upper guide structure to the pool seal ring. After evaluation by the Refueling Supervisor, the wipe was left in the refueling cavity for later retrieval. SCE states that the note preceding step 6.1.3.2 allowed this action. Therefore, SCE concludes that the purpose of the procedure was to allow reasonable latitude in using wipes for contamination control and the need to prevent foreign material from entering the reactor vessel.

NRC Staff Conclusion:

The NRC staff has re-evaluated this example and notes that the procedure is sufficiently unclear in that the steps of the procedure could be interpreted to allow the Refueling Supervisor the discretion to remove the wipe at a later time. In this case, the wipe was removed before it migrated to the reactor vessel and, therefore, we consider this individual example to be of low safety significance. Based on this, we are withdrawing this example of the violation.

However, the NRC staff also notes that the procedure does not provide specific guidelines to the Refueling Supervisor on the conditions to be considered for leaving material in the cavity without positive control (i.e., material involved, distance from the reactor vessel, length of time before retrieval, or the present or future conditions in the refueling cavity). The integrity of the fuel cladding and proper operation of the control element assemblies partly rely on maintaining the reactor coolant system free of debris and thus establishes the need for a foreign material control program. While keeping foreign material out of systems is a part of the program, so is the prompt retrieval of material inadvertently introduced. You should consider the need for more specific guidance in this area.

EXAMPLE 4: Violation -

Procedure SO123-I-1.18, TCN 2-12, "Foreign Material Control during Maintenance, Testing and Inspection," Attachment 2, Step 2.2, states that, "All loose objects such as badges and dosimeters shall be securely fastened to the clothing."

Contrary to the above, on November 5, 1993, a security badge and dosimeter was not securely fastened to an individual's clothing and was lost in the secondary side of Unit 3 steam generator E089.

Southern California Edison Comments:

SCE states that the individual securely taped the dosimetry and site badge to the upper thigh prior to the entering the steam generator as required by procedures. While moving around in the steam generator (a limited space area) the dosimeter and site badge became detached and fell into the steam generator. SCE states that having the dosimeter torn or knocked away does not constitute a violation.

NRC Staff Conclusion:

From personal experience inside the San Onofre steam generators, the NRC staff recognizes the amount of congestion in the steam generators. Although we believe that sufficient taping of the dosimeter and site badge should have prevented these articles from falling into the steam generator, we cannot dispute your claim that the articles were securely fastened prior to entering the steam generator. Therefore, we are withdrawing this example of the violation.

NRC Staff Conclusion Summary:

The NRC staff and SCE agree that Violation example 1 represents a violation of your procedures. However, upon re-evaluation, the NRC staff concludes that Violation examples 2, 3, and 4 are not violations and will be withdrawn. As a result, the NRC staff has re-evaluated the significance of the remaining example of a violation. Despite the fact that the tag was not removed when required, the equipment remained operable nonetheless. Therefore, the safety significance is low and the violation is more appropriately classified as a Severity Level V violation. As a Severity Level V violation, this violation is also appropriately considered as a non-cited violation because the criteria of Paragraph VII.B.(1) of Appendix C to 10 CFR Part 2 were satisfied.

Therefore, this violation consisting of example 1 is considered a non-cited violation and our records will be revised to reflect this.

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