
Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

RICHARD M. ROSENBLUM
VICE PRESIDENT

TELEPHONE
714-458-4550

April 4, 1994

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Docket Nos. 50-361 and 50-362
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, Robert J. Pate, (USNRC) to
Mr. Harold B. Ray (SCE), dated February 28, 1994

The referenced letter provided the results of the routine inspection conducted by Messrs. M. D. Schuster and A. B. Earnest at the San Onofre Nuclear Generating Station, Units 2 and 3, from February 7-11, 1994. This inspection was documented in NRC Inspection Report Nos. 50-206, 50-361, and 50-362/94-04, dated February 28, 1994. The Inspection Report also included a proposed Notice of Violation resulting from that inspection.

The Notice of Violation states in part:

"San Onofre Procedure SO123-XV-9, 6.5.4.1, 6.5.8.5 and 6.5.11 requires, in part, that safeguards information be secured in a steel file cabinet equipped with a locking bar and combination lock; that documents be marked with the words 'Safeguards Information'; and that Electronic-mail not be used to transmit safeguards information.

"Contrary to the above, on February 4, 1994, safeguards information was transmitted by electronic-mail without being marked with the words 'Safeguards Information'.

The apparent reasons for the violation were: (1) individual personnel error (misjudgment), and (2) weakness in the methods for communicating safeguards information protection requirements to personnel. Corrective actions were taken to delete all known copies of the electronic-mail (E-mail), to collect all appropriate E-mail computer back-up tapes and store them in a safeguards cabinet until they can be erased, and to counsel the individual who improperly transmitted the safeguards information on E-mail. Edison was in full compliance with the requirements to control the specified safeguards information on February 16, 1994, when the above actions were completed.

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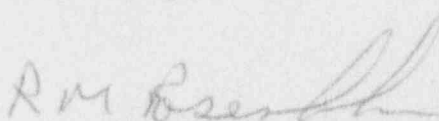
As part of Edison's process for responding to the Notice of Violation and issues of regulatory significance, a division investigation report was initiated to review this incident and develop corrective actions. Before completion of our investigation and identification of appropriate attendant corrective actions, an additional safeguards information mishandling event was identified. Edison has recast the ongoing division investigation to examine the broad issue of control and dissemination of safeguards information from the events taken as a whole.

Preliminary results from our division investigation report indicate that these mishandlings are examples of the same weaknesses in communicating safeguards information requirements to personnel and establishing an appropriate level of sensitivity, comprehension, and appreciation for ensuring the proper handling of safeguards information. Our investigation of these incidents is still in progress. Accordingly, Edison will update this reply to a Notice of Violation by May 15, 1994 to include any additional corrective actions that are identified.

Also, as requested in the referenced inspection report, Edison has responded to the several questions asked therein.

If you have any questions, please call me.

Sincerely,



R. M. Rosenblum

Enclosure

cc: K. E. Perkins, Jr., Acting Regional Administrator, NRC
Region V
NRC Senior Resident Inspector's Office, San Onofre Units 1,
2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
L. J. Callan, Regional Administrator, NRC Region IV

ENCLOSURE

The enclosure to Mr. Robert J. Pate's letter, dated February 28, 1994, contained the following questions:

NRC QUESTION NO. 1

Were additional copies of the SGI message made by any of the 16 persons, if so were appropriate markings affixed to the document and how were documents protected?

SCE RESPONSE

On February 4, 1994, safeguards information was transmitted by E-mail to 17 individuals. Of the 17 individuals, three were not authorized safeguards information access; however, it should be noted that these three individuals did meet the regulatory requirements of 10 CFR 73.57.

On February 7, 1994, the author of the E-mail re-transmitted the E-mail containing safeguards information to each of the 17 individuals who had previously received the E-mail, plus an additional three individuals (the additional three individuals were authorized safeguards information access). In this subsequent E-mail, a comment was added noting that the e-mail pertained to safeguards information.

Between the period of February 11 through February 14, 1994, designated Site Security representatives interviewed each of the 20 recipients of the safeguards information E-mail. As part of the interview process, each person was asked a series of seven questions regarding the disposition of the safeguards information. In addition, Site Security representatives verified that each individual deleted the safeguards information E-mail from their computer files. During this interview process it was determined that five of the recipients printed the E-mail containing the safeguards information. Of these five printed copies, one copy was provided to Mr. Doug Schuster, USNRC-Region V, one copy was marked and stored as "Safeguards Information", one copy was not appropriately marked as "Safeguards Information", but was stored in an safeguards cabinet, and two copies remained unprotected. (Of these two copies, one was destroyed and one was turned over to Site Security representatives during the interview process.)

Enclosure

NRC QUESTION NO. 2

Were additional E-mail copies sent by any of the 16 persons?

SCE RESPONSE

It was determined during the Security interview process noted above that one recipient forwarded the safeguards information, via E-mail, to two additional individuals, one of whom did not have safeguards information access authorization; however, it should be noted that this individual did meet the regulatory requirements of 10 CFR 73.57.

Site Security representatives interviewed these two individuals and verified that one of the individuals printed the E-mail containing safeguards information. The printed copy remained unprotected until it was turned over to Site Security representatives during the interview process. Site Security representatives confirmed that these two recipients did not forward the safeguards information E-mail to any other individuals and verified that all copies of the E-mail had been deleted from their computer files.

NRC QUESTION NO. 3

What type of default system exists on the computer system when a document is deleted?

SCE RESPONSE

The e-mail backup tapes for the period of February 4 through 14, 1994, which record what is currently stored in each individual's E-mail inbox and folders on a daily basis, were locked in a safeguards cabinet on February 16, 1994, until they can be erased by a safeguards authorized individual.

All recipients of the E-mail were interviewed by Security personnel. All E-mails were verified deleted from the individuals' computer files by February 14, 1994. Deleted E-mails are unrecoverable. However, some individuals use a folder which collects deleted E-mails and retains them prior to an automatic deletion. Site Security representatives verified that all such folders had been purged of the safeguards information E-mail.