

Southern California Edison Company

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November 19, 1982

L. T. PAPAY
VICE PRESIDENT

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REGIONAL
TELEPHONE
213-572-1474

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
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 50-206/82-26
Response to Notice of Violation
San Onofre Nuclear Generating Station, Unit 1

Mr. T. W. Bishop's letter of October 21, 1982 issued IE Inspection Report 50-206/82-26 and forwarded a Notice of Violation resulting from the September 1982 monthly inspection conducted by Mr. L. F. Miller.

The enclosure to this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Bishop's letter of October 21, 1982.

I trust the enclosure responds adequately to all aspects of the violation. If you have any questions or if we can provide additional information, please let me know.

Sincerely,



Enclosure

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

ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. Bishop's letter of October 21, 1982.

ITEM

Appendix A to Mr. Bishop's letter of October 21, 1982 states:

"A. Technical Specification 6.5.2.7a. states:

"In performing their duties with respect to these Appendix A Technical Specifications, the NARC (Nuclear Audit and Review Committee) shall review:

- a. The safety evaluations for 1) changes to equipment or systems to verify that such actions did not constitute an unreviewed safety question.'

"Contrary to this requirement, the NARC had not reviewed the safety evaluations for ninety-five design changes implemented during the 1979-81 time period, which were approved by the On Site Review Committee in the same period. These design changes had been completed as of September 15, 1982.

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

Corrective Action Taken and Results Achieved

A complete review of Nuclear Audit and Review Committee (NARC) meeting minutes was commenced upon discovery of the missing evaluations addressed by the Notice of Violation (above). This review has been completed for the period 1979 through 1981. For all but four design changes, the NARC review was documented in the minutes. These four overlooked design changes will be scheduled for NARC review to correct these omissions. A review of NARC minutes for 1982 is in process and all missing evaluations will be identified and corrected for this year through November 19, 1982 at which time the revised tracking discussed below will be implemented.

Steps Which Will Be Taken To Prevent Further Items of Non-Compliance

Station procedures now require all design changes (now called Proposed Facility Changes (PFCs)) approved by the Onsite Review Committee (OSRC) to be forwarded to Corporate Documentation Management (CDM). In order to ensure all PFCs are reviewed by NARC, CDM will log-in all PFCs upon receipt, forward them to NARC for review, and track the PFC until the NARC review is completed and documented.

Date When Full Compliance Will Be Achieved

NARC review of the aforementioned (4) outstanding design changes will be completed by December 30, 1982. Omissions discovered for the period January 1, 1982 through November 19, 1982 will be scheduled for NARC review as they are identified. These reviews, if any, will be completed by April 29, 1983. CDM logging and tracking of PFCs through documentation of NARC review will be initiated November 19, 1982.

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