

Southern California Edison Company

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RICHARD M. ROSENBLUM
VICE PRESIDENT

TELEPHONE
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June 2, 1994

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

Gentlemen:

Subject: Dockets No. 50-361 and 50-362
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter from Mr. T. P. Gwynn (USNRC) to
Mr. Harold B. Ray (SCE), dated May 2, 1994

The referenced letter forwarded a Notice of Violation resulting from the NRC inspection conducted March 21 - 25, 1994, at the San Onofre Nuclear Generating Station, Units 2 and 3. This inspection was documented in NRC Inspection Report Nos. 50-361 and 50-362/04-09, dated May 2, 1994.

The enclosure to the reference letter also transmitted a Notice of Violation which states in part:

"San Onofre Instrument and Test Procedure SO123-II-1, 'Calibration and Control of Measure and Test Equipment,' Revision 3, dated August 25, 1992, paragraph 6.9.5 states, 'It is the responsibility of the user of the M&TE to ensure the M&TE is checked back in to the Toolroom as far before the calibration due date as practical.'

"Contrary to the above, on March 23, 1994, 97 measuring and test items had not been checked back in to the toolroom before the calibration due date."

As noted in the excerpt from the procedure above, Edison expects M&TE to be checked back in to the toolroom before the recall date. We also recognize that in certain circumstances this management expectation will not be met. For instance, some M&TE pieces are used in radiologically controlled areas and are not decontaminated and removed until after the recall date. Also,

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some M&TE is either lost or damaged, and there is a natural time delay of the associated administrative process to thoroughly investigate the potential loss and complete the necessary documentation.

With regard to the lack of a timely return for the referenced 97 pieces of M&TE, although this represents a small percentage of the M&TE, our investigation has concluded that some of the M&TE was not returned because personnel were not diligent in responding to notices requesting return of the equipment. The equipment which was significantly overdue represents approximately 27% of the 97 items. Full compliance was achieved on March 25, 1994, when the M&TE equipment that were significantly overdue were accounted for (i.e., the 26 from 1993 as indicated in IR 94-09 Section 1.2.1).

As indicated by the numbers in this case, the great majority of M&TE is returned prior to the recall date or shortly thereafter. Edison believes that this relatively low number of overdue items (approximately 1% of the greater than 7000 total M&TE items) represents a personnel performance failure on the part of a small number of employees in an otherwise sound program.

As corrective action, Edison has emphasized to appropriate personnel the importance of improving timeliness in returning M&TE for calibration. For the next several months, the Manager of Maintenance will review copies of the M&TE recall list until performance improves to meet his expectations.

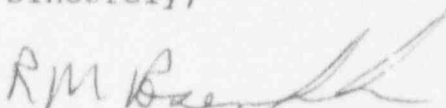
Edison considers the lack of timely return of M&TE equipment an administrative violation that has low safety significance. This administrative requirement is not relied upon to prevent use of out-of-calibration M&TE, and Edison has confirmed that none of these instruments were used to perform measurements after their calibration due date. Work control procedures hold craftsmen personally responsible to verify M&TE equipment they use is within its calibration interval.

Accordingly, based on the administrative nature of the violation, and no evidence of improper usage of M&TE, Edison requests reconsideration of the severity level of the violation. Edison believes the violation to be more appropriately classified a Level V violation per the guidance provided in the enforcement policy (10CFR2, Appendix C).

June 2, 1994

If you have any questions or require additional information,
please call me.

Sincerely,



cc: L. J. Callan, Regional Administrator, USNRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office,
USNRC Region IV
M. B. Fields, NRC Project Manager, San Onofre Units 2 & 3
J. A. Sloan, Senior Resident Inspector, San Onofre Units
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