SCHOOL STATE OF STATE

## UNITED STATES

## NUCLEAR REGULATORY COMMISSION

REGIONIV

611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-8064

JUN - 1 1994

Dockets: 50-361

50-362

Licenses: NPF-10

NPF-15

Southern California Edison Co.
Irvine Operations Center
ANTM: Marold B. Ray, Senior Vice
President, Power Systems
23 Parker Street
Irvine, California 92718

SUBJECT: NRC INSPECTION REPORT 50-361/94-08; 50-362/94-08 (NOTICE OF

VIOLATION)

This refers to the routine inspection conducted by J. Sloan, J. Russell, and D. Solorio of this office on March 8 through April 18, 1994. The inspection included a review of activities authorized for San Onofre Nuclear Generating Station, Units 2 and 3. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during this inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, certain licensed activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation includes two examples of inadequate corrective actions; however, because your corrective actions have already thoroughly addressed the violation examples, no response to this Notice is required.

Additionally, four noncited violations were identified. Two noncited violations were identified by NRC inspectors and related to failure to follow or implement your procedures. The other two noncited violations were licensee-identified and related to minor inadequacies in maintenance procedures. We have also noted in recent inspections weaknesses in maintenance procedures, giving further emphasis that your recent Maintenance Business Plan initiatives to upgrade and validate maintenance procedures is warranted. We are also concerned regarding the number of NRC inspector identified items in this report indicating a need for more attention to detail by your staff.

This inspection report also documents the results of a determination by the Office of Nuclear Reactor Regulation that defueling the reactor constitutes a mode change out of Mode 6 and that reloading fuel constitutes a mode change into Mode 6. Based on discussions with Mr. R. Krieger during this inspection period, we understand that you have committed to revise your station orders and Technical Specification interpretations, prior to the next refueling outage, to incorporate this position.

In accordance with 10 CFR 2.790(a) of the NRC's "Rules of Practice," a copy of this letter and its enclosure(s) will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

A. Bill Beach, Director Division of Reactor Projects

## Enclosures:

 Appendix A - Notice of Violation
 Appendix B - NRC Inspection Report 50-361/94-08; 50-362/94-08

San Diego Gas and Electric Co.
ATTN: Edwin A. Guiles, Vice President
Engineering and Operations
101 Ash Street
San Diego, California 92112

Southern California Edison Company Irvine Operations Center ATTN: T. E. Oubre, Esq. 23 Parker Street Irvine, California 92718

County of San Diego ATTN: Chairman, Board of Supervisors 1600 Pacific Highway, Room 335 San Diego, California 92101

Rourke & Woodruff ATTN: Alan R. Watts, Esq. 701 S. Parker St. No. 7000 Orange, California 92668-4702 Public Utilities Department City of Riverside ATTN: Sherwin Harris, Resource Project Manager 3900 Main Street Riverside, California 92522

ABB Combustion Engineering Nuclear Power
ATTN: Charles B. Brinkman, Manager
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12300 Twinbrook Parkway, Suite 330
Rockville, Maryland 20852

Southern California Edison Company San Onofre Nuclear Generating Station ATTN: R. W. Krieger, Vice President P.O. Box 128 San Clemente, California 92674-0128

California Department of Health Services ATTN: Don J. Womeldorf, Chief Environmental Management Branch 714 P Street, Room 616 Sacramento, California 95814

Bechtel Power Corporation ATTN: Richard Kosiba, Project Manager 12440 E. Imperial Highway Norwalk, California 90650

San Diego Gas & Electric Company ATTN: Robert G. Lacy, Manager Nuclear Department P.O. Box 1831 San Diego, California 92112

Radiological Health Branch State Department of Health Services ATTN: Mr. Steve Hsu P.O. Box 942732 Sacramento, California 94234

City of San Clemente ATTN: Mayor 100 Avenida Presidio San Clemente, California 92672 E-Mail to D. Sullivan (DJS) E-Mail to H. Wong (HJW)

bcc to DMB (IEO1)

bcc distrib. by RIV:

L. J. Callan

DRSS-FIPB

Branch Chief (DRP/F, WCFO)

RIV File

Leah Tremper, OC/LFDCB, MS: MNBB 4503

Resident Inspector

MIS System

Senior Project Inspector (DRP/F, WCFO)

Branch Chief (DRP/TSS)

Project Engineer (DRP/D) A. B. Beach, D:DRP

RIV:SRI:DRP/F	C:DRP/F	D: WCFO LJW	C:DRS/B	D:DRP
JAS1oan:sn	HJWong	KEPerkins	TWesterman (NOV & Para. 8.3)	ABBeach
5/25/94	5/35/94	5/12/94	6/1/94	5/31/94

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