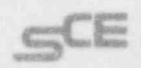


RECEIVED
NRC

Southern California Edison Company



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L. T. PAPAY
VICE PRESIDENT

TELEPHONE
213-572-1474

September 23, 1982

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: R. H. Engelken, Regional Administrator

Dear Sir:

SUBJECT: Docket No. 50-361
NRC Inspection Report 50-361/82-26
Response to Item 82-26-02
San Onofre Nuclear Generating Station, Unit 2

Mr. G. S. Spencer's letter of August 24, 1982 issued NRC
Inspection Report 50-361/82-26 and expressed a concern about a finding
identified in paragraph 4.C.2 of that report.

The enclosure of this letter provides our reply to this finding.

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

Sincerely,

Enclosure

cc: A. E. Chafee (NRC Resident Site Inspector - San Onofre Unit 2)

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ENCLOSURE

Reply to the Item of Concern identified in NRC Inspection Report 50-361/82-26

ITEM

Mr. G. S. Spencer's letter of August 24, 1982 states as follows:

"No items of noncompliance with NRC requirements were identified within the scope of this inspection. However, we are concerned about the findings discussed in paragraph 4.C.2 of the enclosed report. In March, 1982 our inspector specifically identified the need for positive access control to the reactor cavity area once the facility began operating. In addition, we would expect that your own radiation protection program would identify and control such potentially hazardous areas. There were no indications from the current inspection that any action had been taken or was likely to be taken to secure the cavity area prior to increasing reactor power level. This situation appears to us to represent a breakdown in your controls to assure the safety of employees. Accordingly, we request you to reply to this letter. In your reply, please address the following points: (1) what oversights occurred that caused the cavity area access to be uncontrolled; (2) what actions have you taken or plan to take to identify and assure other potentially hazardous areas are adequately controlled. We request you to reply within thirty days of the date of this letter."

RESPONSE :

1. What oversights occurred that caused the cavity area access to be uncontrolled

We have determined that a Unit 2 Health Physics Foreman verified that the cavity access hatch was bolted shut two weeks before initial criticality. However, immediately before criticality, thermal measurements had to be made within the cavity. It appears that the final cleanup and re-securing of the area was not accomplished.

The entry on August 4, 1982 was controlled by a Radiation Exposure Permit, as are all others under similar conditions. A Health Physics representative, using appropriate instrumentation, was present to further control the activity. Southern California Edison believes that this degree of attention was adequate to assure employee safety when viewed against the degree of hazard present and that no breakdown in safety controls is indicated.

2. What actions have you taken or plan to take to identify and assure other potentially hazardous areas are adequately controlled.

With regard to your request for information on actions to identify and control potentially hazardous areas, we concur in the opinion that an added measure of protection is appropriate for especially hazardous areas. To assure that such areas are further identified and controlled, Health Physics Procedure S0123-VII-7.4, "Posting and Access Control", has been revised.

The revised procedure requires that, in addition to the high radiation area controls exercised in accordance with Technical Specifications, areas with the potential for 50 rem/hour dose rates or greater are subject to the following additional requirements:

- 1) Identification and designation in writing by the Health Physics Unit Supervisor to the Health Physics Manager.
- 2) Approval by the Health Physics Manager or designee for entry.
- 3) Control of specially tagged keys which will be logged in and out by the Health Physics Unit Supervisor or designee.
- 4) Posting to read, "Danger, Extremely High Radiation Levels--Access Prohibited".
- 5) Re-verification and certification in writing to the Health Physics Manager that all designated entrances are locked prior to initial startup after extended non-power periods.

The schedule for implementation of these procedural requirements is under development.