

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, California 91770

As a result of the inspection conducted during the period October 1-28, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. Technical Specification 3.14 B(2) requires that with a spray and/or sprinkler system inoperable, the licensee shall establish a continuous fire watch with backup fire suppression equipment for the unprotected area within one hour.

Contrary to this requirement, at 3:45 a.m. on October 12, 1982, the inspector observed that no fire watch was in the lube oil reservoir area. The inspector determined that the sprinkler system in this area had been disabled and a continuous fire watch had been assigned for several weeks previously. The inspector located the assigned fire watch in the 4KV Switchgear Room, a remote area where the assigned fire watch could not continuously monitor the lube oil reservoir area.

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

- B. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Paragraph 2.2.1 of Fire Protection Program Review, BTP APCSB 9.5-1, San Onofre Nuclear Generating Station, Unit 1.

BTP APCSB 9.5-1 requires that the administrative procedures used to formally implement the Fire Protection Program include Station Order S-M-105, Fire Prevention During Open Flame Processes. Station Order S-M-105 was revised and issued as Fire Prevention Procedure S0123-XIII-14.

S0123-XIII-14 requires that all areas within a radius of 35 feet, or below the work area if openings exist, shall be inspected for, and protected in appropriate ways against, possible fire hazards.

Contrary to these requirements, on October 5, 6, 7 and 13, 1982, the inspector observed open flame processes (welding and grinding) in and near the Lube Oil Reservoir and the 4KV Switchgear Room cable trays. Protection had not been provided to preclude ignition or damage of the cables in the trays by welding slag or grinding embers.

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

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

NOV 9 1982

Original signed by  
D. F. Kirsch

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Dated

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D. F. Kirsch, Chief, Reactor Projects Section No. 3  
Reactor Projects Branch No. 2