



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596-5368

JAN 04 1991

Docket Nos. 50-361 and 50-362
License Nos. NPF-10 and NPF-15
EA 90-201

Southern California Edison Company
Irvine Operations Center
ATTN: Mr. Harold B. Ray
Senior Vice President, Nuclear
23 Parker Street
Irvine, California 92718

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTIES -
\$150,000
(NRC INSPECTION REPORT NOS. 50-361/90-37 AND 50-362/90-37)

This refers to the special inspection conducted on October 1 through November 15, 1990 at the San Onofre Nuclear Generating Station, Units 2 and 3. The results of this inspection were documented in the referenced NRC inspection report, sent to you on December 5, 1990. The inspection report addresses two Technical Specifications violations, resulting from misaligned valves, which you identified and reported to our Resident Inspector. You also reported one event pursuant to 10 CFR 50.72 and discussed the events in Licensee Event Reports (LERs) 50-362/90-10 and 50-361/90-12, pursuant to the requirements of 10 CFR 50.73. These issues were discussed with you during an enforcement conference held in the Region V Office on December 11, 1990. Our discussion during the enforcement conference was summarized in Meeting Report Nos. 50-361/90-42 and 50-362/90-42, transmitted to you on December 20, 1990.

The first violation involved inoperability of the steam-driven auxiliary feedwater (AFW) pump in Unit 2 as a result of a misaligned steam drain trap which permitted condensate to accumulate in the steam supply line, and subsequently caused the AFW pump to trip on overspeed. This condition resulted from inadequate procedures for controlling plant evolutions, and remained undetected for a period of approximately 55 days (with the Unit operating in Mode 1) before the facility staff identified and corrected the misalignment. The failure to more promptly identify this violation appears to have resulted from (1) a failure to properly evaluate and respond to the discovery of another misaligned valve associated with the AFW system, (2) failure to properly diagnose the cause of overspeed trips which occurred on October 6 and 16, 1990, (3) poor and informal communication between the Technical and Operations Divisions of your staff, and (4) insufficient operator awareness of plant conditions.

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The second violation involved inadvertent opening of the Unit 3 Train B containment emergency sump outlet isolation valve (3HV-9302), apparently caused by inadequate work control measures. This violation was exacerbated by the failure of Plant Operations personnel to recognize and correct the misalignment for almost four days, including 12 shift changes, (with the Unit operating in Mode 1), even though clear visual indication of the valve's position was provided on the control panel. Insufficient time available to operators for routine monitoring of plant conditions appears to have contributed to this failure. As noted during our inspection of this issue, we are concerned about the level of surveillance, work control, and other activities routinely assigned to Operations personnel, and the impact of these activities on their ability to properly monitor plant conditions. During the period while this valve was open, the Train B high pressure safety injection (HPSI), low pressure safety injection (LPSI), and containment spray (CS) pumps were inoperable, and Unit 3 containment integrity was compromised.

Analyses in your LERs concluded (based on realistic assumptions, and assuming no other equipment failures) that these violations would not have yielded consequences more severe than those determined from previous analyses. However, each of these violations involved undetected inoperability of important safety equipment for an extended period of time, when available indications should have provided for earlier detection of the misalignments. Moreover, the violations resulted in a significant reduction of the overall margin needed to assure safe operation of the plant. Each of these violations is considered a significant regulatory concern because of the safety importance of the affected components, the clear operability requirements provided in your Technical Specifications, and the missed opportunities to identify and correct the violations. Therefore, in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C (1990), each of these violations has been categorized as Severity Level III.

The staff recognizes that immediate corrective action was taken when each of the violations was identified. Moreover, we found your response to these violations to be self-critical and aggressive.

However, to emphasize the importance the NRC attaches to thorough assessment of indicated problems and to an operating environment which fosters operator attentiveness to plant conditions, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Nuclear Reactor Regulation, Regional Operations, and Research, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalties in the amount of \$150,000. The base value of a civil penalty for a Severity Level III violation is \$50,000. The escalation and mitigation factors in the Enforcement Policy were considered as discussed below.

Your staff identified and reported both of the cited violations. However, it is our judgment that both violations should have been identified much sooner than they were. You had opportunities to discover that the steam driven AFW pump was inoperable when your facility staff had indications, such as the improper drain

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lineup on the opposite steam line, of a potential problem. You also had an opportunity to identify the containment sump isolation valve was improperly opened if there had been adequate communications between control room personnel and the involved worker immediately after its occurrence, or had the available valve position indication been checked. Therefore, on balance, we conclude that no mitigation for identification and reporting is appropriate.

As noted above, your staff's response to these violations has been aggressive. The Nuclear Oversight organization and Operations Division showed an objective and self-critical attitude in investigating both events. You initiated immediate corrective actions, including procedure revisions, plant modifications, and operational training. Other longer term improvement efforts such as annunciator and work control enhancements have been identified. Moreover, at the enforcement conference, you acknowledged the weaknesses in work control and operator activity level and committed to address these areas comprehensively. Therefore, 50% mitigation is warranted for the corrective actions taken for each violation.

With regard to the duration of the cited violations, each is considered to have existed for an excessive period. As discussed above, your staff had indications of potential problems with the steam driven AFW pump. In addition to the previously discussed valve misalignment, the facility staff should have been alerted to the problem by the pump overspeed trips that occurred on October 6 and 16, 1990. In the case of the containment sump isolation valve, during the 95 hours it was improperly in the open position 12 shift changes occurred which provided the licensed operators numerous opportunities to discover the problem by recognizing the clear visual indication on the control panel that showed the valve was in the wrong position. Notwithstanding the absence of the indicator on a check list, the operators should have recognized the indicator during their observation of the control panels. We consider the duration of both violations to be significant because you should have known the systems were inoperable. Had your staff been more attentive and performed adequate investigations, these systems would not have been inoperable for an extended period. Therefore, escalation of the civil penalty by 100% of the base amount is warranted for each violation.

The other adjustment factors in the Enforcement Policy were considered, and no further adjustment to the base civil penalty is considered appropriate. Therefore, based on the above, the base civil penalty for each cited violation has been increased by 50%.

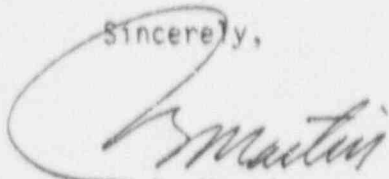
You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790(a), a copy of this letter, the enclosure, and your response will be placed in the NRC Public Document Room.

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The responses directed by this letter and the enclosed Notice are not subject to the clearance procedure of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,



J. B. Martin
Regional Administrator

Enclosure:

Notice of Violation and Proposed Imposition
of Civil Penalties

cc w/enclosure:

H. E. Morgan, Vice President and Site Manager
R. L. Krieger, Station Manager
State of California