

NOTICE OF VIOLATION  
AND  
PROPOSED IMPOSITION OF CIVIL PENALTIES

Southern California Edison Company  
San Onofre Unit 2 and 3

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

During an NRC inspection conducted on October 1 through November 15, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C (1990), the Nuclear Regulatory Commission proposes to impose civil penalties pursuant to section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violations and associated civil penalties are set forth below:

- A. Technical Specification (TS) 3.7.1.2, "Auxiliary Feedwater System," requires that at least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be operable in Modes 1, 2, and 3. The Action statement for this TS requires that with one auxiliary feedwater pump inoperable, the auxiliary feedwater pump shall be made operable within 72 hours or the reactor shall be placed in Hot Standby within the next 6 hours and in Hot Shutdown in the following 6 hours.

Section 1.17 of the TS states that "A...component or device shall be OPERABLE...when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls...or other auxiliary equipment that are required for the...component or device to perform its function(s) are also capable of performing their related support function(s)."

Contrary to the above, a steam trap on a steam line to the turbine which drives auxiliary feedwater pump 2P-140 was isolated from 4:25 a.m. on August 31, 1990 to 2:00 p.m. on October 21, 1990, rendering auxiliary feedwater pump 2P-140 inoperable for Unit 2. The pump was inoperable because isolation of the trap allowed moisture to accumulate in the steam supply line to the turbine, causing the turbine to trip on overspeed when started; therefore, the automatic function of the pump was not available. Table 3.3-5 of the TS shows a response time of 42.7 seconds for actuation of the pump. Also, Section 10.4.9 of the FSAR states that the system automatically supplies feedwater to the steam generators during emergency conditions. The reactor was operated in Mode 1 during the entire period that the trap was isolated.

This item has been categorized as a Severity Level III violation (Supplement I), applicable to Unit 2.

Civil Penalty - \$75,000

- B. Technical Specification (TS) 3.5.2, "ECCS Subsystems - T-AVG Greater Than Or Equal to 350 Degree F," requires in Modes 1, 2, and 3 that two independent Emergency Core Cooling System (ECCS) subsystems be operable, with each subsystem including one operable high-pressure safety injection (HPSI) pump and one operable low-pressure safety injection (LPSI) pump. Subsection a.

of the Action Statement for TS 3.5.2 requires that, with one ECCS subsystem inoperable, the inoperable subsystem shall be restored to operable status within 72 hours or the Unit shall be placed in Hot Standby within the next 6 hours and in Hot Shutdown in the following 6 hours.

TS 3.6.2.1, "Containment Depressurization and Cooling System," requires that two independent containment spray systems shall be operable in Modes 1, 2, and 3 with each spray system capable of taking suction from the refueling water storage tank (RWST) on a Containment Spray Actuation Signal. The Action statement for TS 3.6.2.1 requires that with one containment spray system inoperable, the inoperable spray system shall be restored to operable status within 72 hours or the Unit shall be placed in Hot Standby within the next 6 hours.

TS 3.6.1.1, "Containment Integrity," requires that primary containment integrity be maintained in Modes 1, 2, 3, and 4. The Action statement for TS 3.6.1.1 requires that without primary containment integrity, containment integrity shall be restored within one hour or the Unit shall be in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours.

Contrary to the above, with Unit 3 operating in Mode 1, containment emergency sump outlet valve 3HV-9302 was open from 10:52 a.m. on September 24, 1990 to 9:00 a.m. on September 28, 1990, which rendered Train B HPSI, LPSI, and containment spray subsystems inoperable for lack of net positive suction head and resulted in containment integrity not being maintained by the creation of a flow path out of containment through the refueling water storage tank.

This item has been categorized as a Severity Level III violation (Supplement I), applicable to Unit 3.

Civil Penalty - \$75,000.

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement or explanation to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation (1) admission or denial of the violation, (2) the reasons for the violation if admitted, and if denied, the reasons why, (3) the corrective steps that have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Notice of Violation

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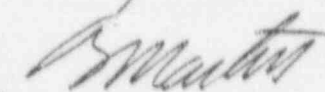
Within the same time as provided for the response required above under 10 CFR 2.201, the licensee may pay the civil penalties by letter addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, with a check, draft or money order payable to the Treasurer of the United States in the cumulative amount of the civil penalties or may protest imposition of the civil penalties in whole or in part by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission. Should the licensee fail to answer within the time specified, an order imposing the civil penalties will be issued. Should the licensee elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalties, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation" and may: (1) deny the violations listed in this Notice in whole or in part, (2) demonstrate extenuating circumstances, (3) show error in this Notice, (4) show other reasons why the penalties should not be imposed. In addition to protesting the civil penalties, such answer may request remission or mitigation of the penalties.

In requesting mitigation of the proposed penalties, the factors addressed in Section V.B of 10 CFR Part 2, Appendix C, should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201 but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of the licensee is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay the penalties due, which has been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalties, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The responses to the Director, Office of Enforcement, noted above (Reply to a Notice of Violation, letter with payment of civil penalties, and answer to a Notice of Violation) should be addressed to: Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region V and a copy to the NRC Resident Inspector, San Onofre Nuclear Generating Station.

FOR THE NUCLEAR REGULATORY COMMISSION



John B. Martin  
Regional Administrator


Dated at Walnut Creek, California  
this 4 day of January 1991


Southern California Edison Company

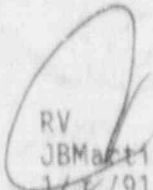
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