

APPENDIX A

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre, Units 2 and 3

Dockets: 50-361
50-362
Licenses: NPF-10
NPF-15

During an NRC inspection conducted on April 19 through May 28, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 7(e)(1), recommends, in part, procedures for control of radioactivity, including procedures for a Radiation Work Permit System.

Licensee Procedure S0123-VII-20.10.1, "Radiation Exposure Permits [REPs]," Revision 0, January 1, 1994, Section 6.3.2, states that "protective requirements specified by the REP are required for each job assigned by the REP. These include use of protective clothing" The Worker Instruction section of licensee REP 100030, Revision 3, dated March 1, 1994, "Chemistry Functions; All Areas Except Containments," lists, in part, the following special instruction:

"Lab coat, and gloves, required when reaching into a contaminated area."

Contrary to the above, on May 23, 1994, a chemistry technician reached into a contaminated area to obtain a sample from the Unit 3 safety equipment building sump wearing only surgeon's gloves without a lab coat.

This is a Severity Level IV violation (Supplement IV) (362/9412-01).

- B. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 9(a), recommends, in part, procedures for maintenance that can affect the performance of safety-related equipment should be properly . . . performed in accordance with written procedures . . . appropriate for the circumstances.

Station Procedure S0123-I-1.7, "Maintenance Order Preparation, Use and Scheduling, Temporary Change Notice (TCN) 4-13, Section 6.15.1.2.1, states that " . . . work packages, including . . . procedures, must be

followed in procedural compliance subject to the following exceptions . . ." The exceptions listed were not satisfied in this case.

Station Procedure S023-I-8.148, "Pump-Goulds Model 3415 Bearing Replacement and Overhaul," TCN 0-8, Step 6.4.3.15, requires application of silicone sealant to the upper-half and lower-half bearing adapters.

Contrary to the above, on May 18, 1994, silicone sealant was not applied as required by Step 6.4.3.15 until after Step 6.4.3.18 had been performed.

This is a Severity Level IV violation (Supplement I) (362/9412-02).

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 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 Senior Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an order or a Demand for Information as to why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 12 day of July 1994