

## NOTICE OF VIOLATION

Southern California Edison Company  
San Onofre Units 1, 2 and 3  
NPF-15

Docket Nos.: 50-206, 50-361 and 50-362  
License Nos.: DPR-13, NPF-10 and

During an inspection conducted April 1-5, 1991, 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 (1991), the violations are listed below:

- A. 10 CFR 50.59, "Changes, Tests and Experiments" states in part that the holder of a license authorizing operation of a utilization facility may make changes in the facility and procedures as described in the safety analysis report under certain conditions and that records of these changes, tests, and experiments must include a written safety evaluation.

Contrary to the above requirement, the following changes were made to the facility as described in the safety analysis report without performing a written safety evaluation as evidenced by the following examples:

1. From November 1989 through January 1991 liquid waste containing radioactive and hazardous materials (mixed waste) was stored and processed in what was called parking lot 1, an activity in an area not previously described.
2. From August 1984 through March 1991 radioactive material was stored in what was called parking lot 1, an activity in an area not previously described.

This is a Severity Level IV Violation (Supplement 1).

- B. 10 CFR 50.71, "Maintenance of records, making of reports" states in part that each person licensed to operate a nuclear power reactor shall periodically update the Final Safety Analysis Report (FSAR) report to assure that it contains the latest material developed. Revisions must be filed no less frequently than annually and shall reflect all changes made to the facility or procedures as described in the FSAR up to a maximum of six months prior to the date of filing.

Contrary to the above requirement, the FSARs were not maintained up to date as evidenced by the following examples:

1. Updates of the Unit 2/3 FSAR through Revision 7, dated February 1991, did not describe the Multi-Purpose Handling Facility (MPHF) located in parking lot 1 since 1984, the mixed waste storage and processing operation located next to the MPHF since 1989 and several other minor changes to FSAR Chapters 11 and 12.
2. Updates of the Unit 1 FSAR through Revision 2, dated December 1990, did not describe the Mechanical Decontamination Facility (MDF) in operation since 1986, the mixed waste storage and processing facility in operation since 1989 and the proper location of the MPHF.

This is a Severity Level IV violation (Supplement 1).

- C. Technical Specification 6.8, "Procedures and Programs" states in part that written reviewed and approved procedures will be established, implemented and maintained for certain activities including the processing of liquid radioactive waste.

Contrary to the above requirement, from November 1989 through January 1991 liquid radioactive waste was processed at the mixed waste storage and processing facility without reviewed and approved procedures.

This is a Severity Level IV violation (Supplement 1).

- D. 10 CFR 20.203 (f) "Containers" states in part that each container of licensed material bear a durable, clearly visible label identifying the radioactive contents.

Contrary to the above requirement, on April 3, 1991, three of four Unit 2/3 high range main steam line radiation monitors contained approximately 162 microcuries of cesium-137 and did not bear a label identifying their radioactive contents.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement or explanation in response Items A, B and C to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector at San Onofre Nuclear Generating Station, 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, 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. Where good cause is shown, consideration will be given to extending the response time.

Dated at, Walnut Creek, California  
this 30<sup>th</sup> day of May 1991