

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

Southern California Edison Company
San Onofre Nuclear Generating Station,
*Unit 3

Docket No. 50-362
License No. NPF-15
EA 84-34

This Notice of Violation and Proposed Imposition of Civil Penalty involves violations of regulatory requirements related to the operability of the San Onofre Unit No. 3 containment spray system. At approximately 0955 hours on March 4, 1984, the reactor was placed in operational mode 3 with both trains of the reactor containment spray system inoperable in that two stop check valves in the system were locked closed. This condition existed until the valving error was discovered and corrected by station operators at approximately 0200 hours on March 17, 1984. In addition, during this period one of the two onsite emergency diesel generators was removed from service for maintenance purposes from about 0421 hours on March 15, 1984 to about 1736 hours on March 16, 1984, thus rendering one of the two reactor containment emergency cooling trains incapable of being operated in the event of a loss of all offsite electrical power to the plant.

To emphasize the importance NRC places on conducting licensed activities in accordance with established procedures, licensee management's responsibility to provide and continually assess the implementation and effectiveness of administrative controls to ensure the adequacy of such procedures, and management's responsibility to take effective action to correct underlying causes of a manifest problem, the Nuclear Regulatory Commission proposes to impose a civil penalty in the amount of Two Hundred and Fifty Thousand Dollars (\$250,000) for the violations set forth in this Notice. In accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2282, PL 96-295 and 10 CFR 2.205, these violations and associated civil penalties are set forth below:

I. VIOLATIONS ASSESSED A CIVIL PENALTY

A. Technical Specification 3.6.2.1 states, in part,

"Two independent containment spray systems shall be OPERABLE with each spray system capable of taking suction from the RWST on a Containment Spray Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal. Each spray system flow path from the containment sump shall be via an OPERABLE shutdown cooling heat exchanger.

APPLICABILITY: MODES 1, 2 and 3...."

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Technical Specification 3.0.4 states, in part,

"Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements...."

Technical Specification 3.0.3 states, in part,

"When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour, action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At LEAST COLD SHUTDOWN within the subsequent 24 hours...."

Contrary to the above requirements, on March 4, 1984, Unit 3 entered OPERATIONAL MODE 3 at approximately 0955 hours with both containment spray pump discharge stop check valves locked shut, thus rendering both independent containment spray systems inoperable. This condition continued until 0200 on March 17, 1984, at which time the licensee identified and corrected the above condition. During this entire period Unit 3 was in OPERATIONAL MODES 1, 2 and 3.

The violation concerning the inoperability of the containment spray system is an example of an event in which the licensee was unaware of a condition resulting in a continuing violation. The licensee should have been aware of the condition and had an opportunity to correct the condition. A separate violation and attendant civil penalty may be considered for each day that the licensee clearly should have been aware of the condition or had an opportunity to correct the condition, but failed to do so. Consequently, each day the licensee operated from March 4 through March 17, 1984, is considered a separate Severity Level III violation for purposes of computing a civil penalty. In view of the circumstances of this case, a cumulative penalty of Two Hundred and Fifty Thousand Dollars is being proposed for these violations.

This is a Severity Level III violation (Supplement I).
(Civil Penalty - \$250,000).

II. VIOLATION NOT ASSESSED A CIVIL PENALTY

Technical Specification 3.8.1.1 states, in part,

"As a minimum, the following A.C. electrical power sources shall be OPERABLE:...

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b. Two separate and independent diesel generators...

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:...

c. With one diesel generator inoperable in addition to ACTION a or b above, verify that:

1. All required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and 2...

"If these conditions are not satisfied within 2 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

Contrary to the above requirements, on March 15, 1984 at approximately 0421 hours, the Train B diesel generator was made inoperable (placed in Maintenance Lockout) while both trains of the Containment Spray System were inoperable due to the containment spray pump discharge stop check valve being locked in the closed position. This condition was corrected at 1736 hours on March 16, 1984 when Train B Diesel Generator was returned to service and declared operable. During this entire period Unit 3 was in OPERATIONAL MODE 1.

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

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit to the Director, Office of Inspection and Enforcement, USNRC, Washington, D.C. 20555, and a copy to the Regional Administrator, USNRC, Region V, within 30 days of the date of this Notice, a written statement or explanation, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which 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. 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.

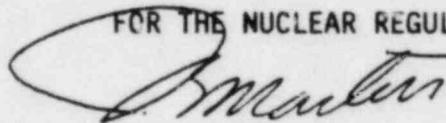
Within the same time as provided for the response required above under 10 CFR 2.201, Southern California Edison Company may pay the civil penalty in the amount of \$250,000 or may protest imposition of the civil penalty in whole or in part by a written answer. Should the Southern California Edison Company

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Fail to answer within the time specified, the Director, Office of Inspection and Enforcement, will issue an order imposing the civil penalty in the amount proposed above. Should the Southern California Edison Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, such answer may: (1) deny the violations listed in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice, or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty. In requesting mitigation of the proposed penalty, the five factors contained in Section IV (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 by specific reference (e.g., giving page and paragraph numbers) to avoid repetition. - The Southern California Edison Company's attention is directed to the other provisions of 10 CFR 2.201, regarding the procedure for imposing a civil penalty.

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

FOR THE NUCLEAR REGULATORY COMMISSION



J. B. Martin
Regional Administrator

Dated at Walnut Creek, California
this 16 day of May 1984