



**Southern California Edison Company**

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September 18, 1995

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Dear Sir:

Subject: Docket Nos. 50-361 and 50-362  
Reply to a Notice of Violation  
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, Ross A. Scarano, (NRC) to Harold B. Ray (Edison),  
dated August 24, 1995

The referenced letter provided the results of NRC Inspection Report (IR) 50-361/95-15 and 50-362/95-15, conducted by Mr. A. B. Earnest on July 17-21, 1995. The enclosure to the referenced letter transmitted a Notice of Violation. This letter provides Edison's reply to the Notice of Violation.

Violation A of the reference identified several examples of failure to record events in the 24 Hour Safeguards Event Log (SEL) including: partial loss of the security computer system; a failure to escort a bulk load of material; degraded vital area barriers; degraded protected area alarm points; positive drug test of an on-duty security officer involved in an altercation; and three instances of failure to protect Safeguards Information (SI) in accordance with the procedure.

Edison has concluded the reasons for the violations were, in some instances, misjudgment, and in the majority of the cases, Edison not recording the items in the SEL was consistent with Edison's previous practice which had not been unfavorably commented upon by the NRC. As such, Edison believes some of the instances represent an evolving Edison understanding of NRC expectations; different than that acquired in past years.

In all cases, these events were logged in Edison's Reportability Disposition Sheet (RDS) book maintained adjacent to the SEL book and readily available for NRC inspection. The RDS entries were used to identify every example in Violation A. The RDS book has been provided to NRC inspectors for their examination in the past.

While the requirement to log some of these items is a different practice than that endorsed in the past, Edison has moved these examples from the RDS book to the SEL book. In addition, Edison will enhance appropriate

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procedures and train appropriate personnel to include these type of events in the SEL. Edison was in full compliance by September 15, 1995, when these events had been logged in the SEL.

With respect to Violation A, Edison has reviewed each of the examples and noted the Enforcement Policy in NUREG 1600, Supplement III states;

D. Severity Level IV - Violations involving for example:

4. A failure to make, maintain, or provide log entries in accordance with 10 CFR 73.71 (c) and (d), where the omitted information (i) is not otherwise available in easily retrievable records, and (ii) significantly contributes to the ability of either the NRC or the licensee to identify a programmatic breakdown.

As noted above, Edison recorded all of the examples in Violation A in the RDS book which is filed adjacent to the SEL book in the Security office and was available to and reviewed by Mr. Earnest. Edison therefore believes the information is recorded and readily available in easily retrievable records for the NRC.

Edison believes this item was an administrative error with minor safety significance. Therefore, Edison respectfully requests Violation A be reclassified as a non-cited violation.

Violation B of the reference identified several examples of failure to protect safeguards information (SI) including: two lost SI documents; two SI depositories left unattended and unlocked; and one instance where an SI document was transmitted through Edison's internal mail system in a "swiss" envelope.

As noted in the reference, in each of the instances, the failure was due to personnel error resulting from either misjudgment or inattention to detail in following the procedure as written.

As corrective action, appropriate personnel were counseled and/or retrained on the proper methods for controlling SI. In addition, Edison has taken the following corrective actions:

- The Vice President, Engineering & Technical Services (E&TS) met with appropriate Managers and Supervisors in E&TS to increase sensitivity, comprehension, and appreciation for the proper handling of SI material and stress the significance of verbatim procedural compliance.
- Edison has reduced the number of SI authorized personnel and SI storage locations.
- A Safeguards Information Helpline bulletin board was established to respond to questions from employees.

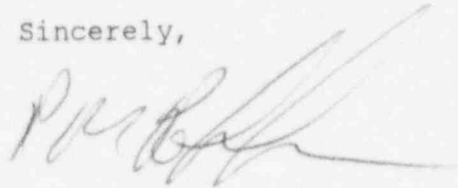
- A memorandum signed by Senior Management was distributed to all nuclear organization employees emphasizing management expectations and the importance of adhering to all regulations and requirements.
- Corrective measures for future violations will include counseling by the Vice President.
- Quality Assurance, Security, and Access Authorization formed an inspection team and are conducting unannounced SI surveillances each month at selected SI storage locations until management's expectations are attained.

The date of full compliance was July 18, 1995 when Edison determined all SI documents associated with this finding were properly controlled in accordance with Edison's procedures.

Edison is confident the corrective actions taken and planned will minimize future violations. We believe the workforce compliance with SI requirements will improve. However, should further incidents occur, Management is positioned to act decisively and firmly to reinforce the consequences of such infractions.

If you have any questions or require additional information, please call me.

Sincerely,



cc: L. J. Callan, Regional Administrator, NRC Region IV  
R. A. Scarano, Director, Division of Radiation Safety and Safeguards, Region IV  
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3