

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-362/84-26

Docket No. 50-362

License No. NPF-15

Licensee: Southern California Edison Company
P. O. Box 800, 2244 Walnut Grove Avenue
Rosemead, California 91770

Facility Name: San Onofre Unit 3

Location: Southern California Edison Company Corporate Offices
Rosemead, California

Conference conducted: August 8, 1984

Prepared by: P. H. Johnson
P. H. Johnson, Chief
Reactor Projects Section No. 3

9/12/84
Date Signed

Approved By: P. H. Johnson
P. H. Johnson, Chief
Reactor Projects Section No. 3

9/12/84
Date Signed

Summary:

Enforcement Conference on August 8, 1984 (Report No. 84-26)

The following matters were discussed:

1. Actions being taken by the licensee in response to the Notice of Violation issued on May 16, 1984.
2. The licensee's written response to the Notice of Violation.

This meeting and enforcement conference involved a total of 20 hours by six NRC representatives.

DETAILS

1. Meeting and Enforcement Conference Participants

a. Southern California Edison Company (SCE)

- *W. R. Gould, Chairman of the Board
- *H. P. Allen, President
- D. J. Fogarty, Executive Vice President
- H. B. Ray, Vice President, Site Manager
- K. P. Baskin, Vice President, Nuclear Engineering, Safety, and Licensing
- J. M. Curran, Quality Assurance Manager
- J. G. Haynes, Station Manager
- R. W. Krieger, Deputy Station Manager
- W. C. Moody, Director, Customer Relations (Formerly Deputy Station Manager)
- R. Demaut, Consultant

b. San Diego Gas and Electric Company

- *A. T. Davis, Group Vice President of Operations

c. Nuclear Regulatory Commission

- J. B. Martin, Regional Administrator, Region V
- R. C. DeYoung, Director, Office of Inspection and Enforcement
- T. W. Bishop, Director, Division of Reactor Safety and Projects, RV
- A. D. Johnson, Enforcement Officer, Region V
- P. H. Johnson, Chief, Reactor Projects Section 3, Region V
- A. E. Chaffee, Senior Resident Inspector, San Onofre

*Attended enforcement conference only.

2. Background

In a letter dated May 16, 1984, NRC Region V issued a Notice of Violation and Proposed Imposition of Civil Penalties to the licensee. The licensee responded in a letter dated June 15, 1984. This meeting and enforcement conference were conducted because of (1) SCE's request to discuss corrective actions being taken and (2) NRC questions regarding certain aspects of SCE's June 15 response.

3. Management Meeting

In the management meeting, which began at 9:45 a.m., NRC representatives noted that the licensee's response to the Notice of Violation had discussed improved administrative controls. However, increased management attention and involvement to ensure effective implementation of these controls had not been addressed. The licensee described actions being taken since May 29, 1984, to provide increased management involvement in safety-related activities. These included additional staff meetings, additional management and supervisory presence in the plant, improved understanding of and communication regarding plant

problems, a more formal management surveillance program, and in-depth management reviews of safety performance.

The meeting participants also discussed procedure adherence and when a procedure change is or is not necessary. It was agreed that this would be discussed further at another time in an effort to more clearly define the threshold for required procedure changes per Section 6.8.3 of the Technical Specifications. The licensee also presented and discussed a revised site organization which became effective on June 1, 1984.

The management meeting adjourned at 12:15 p.m.

4. Enforcement Conference

In the enforcement conference, which began at 1:30 p.m., NRC representatives expressed a concern that the May 16, 1984, enforcement letter had identified a need at San Onofre Units 2 and 3 for more management involvement. They stated that, while the NRC strongly supports the licensee's initiatives involving improved procedures, administrative controls, systematization of plant operation, and additional training, the licensee's June 15, 1984, response had not mentioned management involvement to ensure that the improvements discussed were properly implemented. The NRC representatives noted that the increased management involvement discussed during the morning meeting had been encouraging.

The licensee summarized the various steps being taken to ensure more active management involvement at San Onofre, as discussed during the morning meeting, and stated that SCE management would perform critical self-appraisals of its safety performance. They also stated that, subject to the NRC's concurrence, a supplemental response to the Notice of Violation and Proposed Imposition of Civil Penalties would be provided (Note: a supplemental response was subsequently transmitted by a letter dated August 13, 1984, and is being evaluated by the NRC).

The enforcement conference adjourned at 2:15 p.m.