

Southern California Edison Company



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DAVID J. FOGARTY
EXECUTIVE VICE PRESIDENT

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August 13, 1984

Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. R. C. DeYoung, Director

Dear Sir:

Subject: Docket No. 50-362

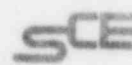
Additional Response to Notice of Violation and
Proposed Imposition of Civil Penalties
San Onofre Nuclear Generating Station, Unit 3

- References:
- (1) Letter, Mr. J. B. Martin (NRC) to Mr. D. J. Fogarty (SCE), "Notice of Violation and Proposed Imposition of Civil Penalties," dated May 16, 1984
 - (2) Letter, Mr. D. J. Fogarty (SCE) to Mr. R. C. DeYoung (NRC), "Response to Notice of Violation and Proposed Imposition of Civil Penalties," dated June 15, 1984
 - (3) Letter, Mr. R. A. Scarano (NRC) to Mr. K. P. Baskin (SCE), dated July 25, 1984

Referenced letters (1) and (2) provide, respectively, a Notice of Violation and proposed imposition of civil penalty and a response thereto which includes Southern California Edison Company's request for remission of the proposed civil penalty. The purpose of this letter is to provide additional information concerning corrective action that has been or is being taken by SCE to address management's responsibility to ensure against continuing errors in operating performance.

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Reference (2) briefly noted that SCE has devoted considerable attention to remarks made by Mr. DeYoung and Mr. Martin at a May 9, 1984, Enforcement Conference concerning the need for management and supervision to become more consistent and effective in ensuring that management controls are being properly implemented in all areas. The letter noted that a multiple action plan had been developed in this regard, and had been provided to the NRC Senior Resident Inspector for information, but it did not include a description of the plan or a discussion of its objectives.

At a subsequent Enforcement Conference held on August 8, 1984, at the SCE General Offices in Rosemead, action taken in response to the need for more effective management and supervision of operational activities was described, and a status report was provided. This action is summarized in an enclosure hereto.

These actions include: increased management presence in the plant by conducting routine system walkdowns and in plant inspections; increased management communication in plant operation; and improved management attention to detail.

During the meeting on August 8, Mr. Martin emphasized the importance of SCE performing tough, critical self-appraisals of performance on a continuing basis. Similarly, Reference (3) discussed the importance the NRC places on introspective assessments by SCE of operating incidents. SCE agrees that this is our responsibility, and we are committed to ensure that such appraisals and assessments are conducted consistently and that appropriate corrective actions are taken promptly in all areas. While due attention will be given to deficiencies in operator performance and in procedures for operation, special emphasis will be given to the need for detection of deficiencies in management and supervisory monitoring and control systems. Included in the actions described in the enclosure are items to specifically address this responsibility.

Finally, as we indicated at the August 8 meeting, SCE welcomes the constructive comments and insights we have received from NRC oversight of our activities. We recognize our obligation to identify and correct deficiencies ourselves, and we will continue to pursue that obligation aggressively.

If there are any questions or comments in this regard, please let me know.

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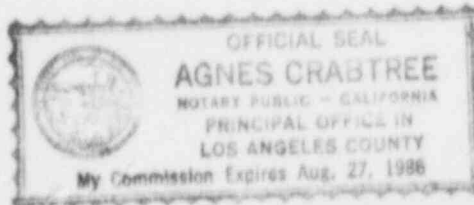
SCE

Subscribed on the 14th day of AUGUST, 1984.

Sincerely,

David J. Fogarty

Subscribed and sworn to before me this 14th day of August, 1984.



Enclosure

cc: J. B. Martin (USNRC Regional Administrator, NRC Region V)
A. E. Chaffee (USNRC Senior Resident Inspector, Units 1, 2
and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)
A. J. D'Angelo (USNRC Resident Inspector, Unit 1)

Enclosure

SUMMARY OF ACTIONS TAKEN TO IMPROVE MANAGEMENT AND SUPERVISORY EFFECTIVENESS

REQUIREMENT

Essential to operational excellence at San Onofre is a commitment by management and supervision to ensure through direct, personal contact and observation that activities are conducted properly and in strict compliance with requirements. This commitment must be maintained consistently throughout the responsible organizations.

IMPLEMENTATION

Although this requirement has previously been responded to in a variety of ways, in order to achieve significant additional effectiveness, a consensus process was used to identify and implement specific actions by the site organization as a whole. Some actions are refinements of prior practices, and others represent new initiatives.

ACTIONS

Actions have been or are being taken in six broad areas. The areas and examples of the actions being taken, are as follows:

1. Actions to Increase Management Awareness of Performance

Objective: Provide for broader scope and greater depth of each manager's personal awareness of operational performance.

- Examples:
- a. Implemented a systematic management monitoring and feedback program to identify and correct deficiencies and to facilitate communication of observations leading to improvements in operation.
 - b. Established a management forum, separate from the safety committees, to regularly and critically evaluate specific incidents and performance, generally and to identify areas and means of achieving improvement.
 - c. Improved regular communication concerning plant operations with respect to detail, timeliness and audience, both upward and downward.

2. Actions to Focus Appropriate Management/Supervisory Attention on Highest Priorities

Objective: Remove distractions and roadblocks preventing full management and supervision attention to, and involvement in, operational activities.

- Examples:
- a. Evaluate, and modify if necessary, the role and performance of supporting organizations to the Station.
 - b. Systematically identify and remove specific roadblocks for each individual manager and supervisor.

3. Actions to Improve Management/Supervisory Performance

Objective: Systematically correct both supervisory skills deficiencies and operational skills deficiencies.

- Examples:
- a. Evaluate, and modify as necessary, organizational and individual descriptions of responsibilities and authorities. Clarify individual understandings of these descriptions.
 - b. Implement a formalized management and supervisory skills development program specific to San Onofre.
 - c. Review, and adjust as required, supervisory spans of control.
 - d. Affirm the status and authority of the Plant and Shift Superintendents.
 - e. Continue to increase the use of licensed persons in operations support and management roles.

4. Action to Improve Organizational Integration and Two-Way Communication

Objective: Ensure that management and supervision are fully involved in effective group and individual communication processes to identify and implement actions to improve performance.

- Examples:
- a. Increase use of interactive communication techniques.
 - b. Utilize independent audit and evaluation resources to identify areas and means of improvement.

5. Actions to Improve Effectiveness of, and Management Participation in Training

Objective: Use Training and Management resources together to more directly address performance requirements as well as basic knowledge requirements.

- Examples:
- a. Increase training specifically directed to professionalism, including formality and attention to detail.
 - b. Increase the systematic involvement of management and supervision in the formal training process.

- c. Provide dedicated, licensed supervision of operational on-the-job training.
- d. Implement a qualification and bonus program for nonlicensed technical personnel which is based on demonstrated knowledge of the administrative controls.

6. Actions to Independently Evaluate Supervisory Roles in Operations

Objective: Determine if additional actions to improve performance in the area of Operations can be identified based on INPO experience.

- Examples:
- a. Implement modifications to the Units 2 and 3 control room area to relocate supervision closer to the activities for which they are responsible.
 - b. Increase the extent to which supervisors actively coach and critique the performance of their assigned operators.

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