

Southern California Edison Company

23 PARKER STREET

IRVINE, CALIFORNIA 92718

May 11, 1992

HAROLD B. RAY
SENIOR VICE PRESIDENT

TELEPHONE
714-456-4400

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

Gentlemen:

Subject: Docket No. 50-361
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Unit 2

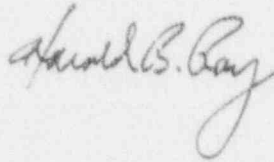
Reference: Letter from Mr. S. A. Richards (USNRC) to
Harold B. Ray (SCE), dated April 2, 1992

The referenced letter forwarded a Notice of Violation resulting from the routine NRC inspection conducted from January 28, 1992 through March 10, 1992, at the San Onofre Nuclear Generating Station, Units 1, 2, and 3. This inspection was documented in NRC Inspection Report Nos. 50-206/92-06, 50-361/92-06, and 50-362/92-06.

In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the Notice of Violation.

If you have any questions regarding SCE's response to the Notice of Violation or require additional information, please call me.

Sincerely,



Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre
Units 1, 2, and 3

9205140265 920511
PDR ADOCK 05000361
G PDR

JE01

ENCLOSURE

Reply to a Notice of Violation

The enclosure to Mr. Richards' letter dated April 10, 1992 states in part:

"10 CFR 50.59(b)(1) states, in part, that the licensee shall maintain records carried out pursuant to making changes to the facility and that these records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question. 10 CFR 50.59(a)(2)(ii) states that a change is deemed to involve an unreviewed safety question if the possibility for a malfunction of a different type than any evaluated previously in the safety analysis report may be created.

"Contrary to the above, as of December 31, 1991, the licensee installed and operated temporary facility modification (TFM) 2-91-BHA-001, Revision 0, that introduced a credible chemical spray hazard to safety related components in the high pressure safety injection, containment spray, shutdown cooling, and low pressure safety injection systems. The safety evaluation did not consider all potentially affected components nor did it document the bases for this modification's acceptability, given that the environmental qualifications of safety related components could have been impacted.

"This is a Severity Level IV violation (Supplement I)"

May 11, 1992

RESPONSE1. Reasons for the violation.

Trained and experienced SCE engineers are typically assigned the responsibility of preparing Temporary Facility Modifications (TFMs), including the associated safety evaluation (10 CFR 50.59). In addition, a substantial technical and supervisory review of TFMs is conducted prior to their implementation.

TFM 2-91-BHA-001 was prepared under the direction and oversight of SCE supervision, by a contract engineer with no previous experience with respect to SCE temporary modifications. However, the review of the TFM, including the safety evaluation, performed by SCE supervision was inadequate, in that it did not effectively take into account the experience of the engineer. As a consequence, even though the Environmental Qualification (EQ) issues associated with the modification were considered during the TFM preparation, the review was not sufficiently rigorous to ensure that all the components potentially affected by the TFM, including EQ aspects, were formally addressed.

2. Corrective steps that have been taken and the results achieved.**Revised TFM**

On April 4, 1992, Revision 1 of TFM 2-91-BHA-001 was issued. The safety evaluation in Revision 1 included a documented assessment of the impact of the TFM on the EQ of installed components. This evaluation concluded that the TFM would not affect the EQ of important-to-safety plant equipment and components.

Training

The engineer was trained on the requirements of SCE management relating to the thoroughness of safety evaluations.

May 11, 1992

3. Corrective steps that will be taken to avoid further violations.

Management Direction to Supervision

SCE management will meet with Station Technical supervisors and emphasize the expectation that supervisors are to ensure that assignments to engineers are consistent with their technical capabilities. In addition, supervisors will be reminded of their obligation to provide a level of oversight of technical work commensurate with the qualifications and experience of each of the contributors.

Revise Procedure

Procedure SO123-V-5.10, "Temporary Facility Modification (TFM)", will be revised by August 15, 1992, to include more specific controls that ensure safety evaluations include a complete and documented EQ evaluation when temporary modifications have the potential of impacting the environmental qualification of important-to-safety components. In addition, the revised procedure and this NOV response will be incorporated into the lessons learned portion of the training program for TFMs and safety evaluations.

Review Safety Evaluations

Although it is believed the problems associated with Revision 0 of this TFM represent an isolated case, SCE will review safety evaluations for TFMs currently installed in Units 1, 2, and 3. This review will ensure the environmental impact of those TFMs has been properly evaluated and documented.

4. Date when full compliance will be achieved.

Full compliance was achieved on April 4, 1992, when Revision 1 of TFM 2-91-BHA-001 was issued. The safety evaluation in Revision 1 documented the basis for concluding the TFM would not affect the EQ of important-to-safety plant equipment and components.