

## UNITED STATES

## NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-8064

JAN 1 9 1996

Southern California Edison Co.
San Onofre Nuclear Generating Station
ATTN: Harold B. Ray
Executive Vice President
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: NRC INSPECTION REPORT 50-361/95-26; 50-362/95-26 AND NOTICE OF VIOLATION

This refers to the engineering and technical support inspection conducted by Mr. R. Mullikin and others of this office on November 13 through December 1. 1995. The inspection included a review of the activities authorized for your San Onofre Nuclear Generating Station. Units 2 and 3. On December 1. the findings were discussed with those members of your staff identified in the enclosed report. Another exit meeting was held via telephone on January 3. 1996.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. The purpose of this inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

The inspection determined that your staff provided effective engineering and technical support to plant operations. Specifically, your staff's aggressive pursuit of corrective actions for a previous violation have resulted in the identification of a significant oversight in the vendor's original high energy line break analysis, wherein adjacent safety-related areas could be affected via the nonsafety-related heating, ventilating, and air conditioning systems. The inspection results also indicate the need for increased management attention to the maintenance of the updated final safety analysis report, and the timeliness of corrective actions and nonconformance reports.

Based on the results of this inspection, the NRC has determined that one violation of NRC requirements occurred. The violation involved the failure to perform a 10 CFR 50.59 safety evaluation for the replacement of a reactor coolant system gas vent flow-restricting orifice with a gate valve even though this change affected the design bases description in the updated final safety analysis report. In addition, your staff had not instituted a change request to the updated final safety analysis report to reflect this modification. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report.

Our concern regarding the violation is heightened by the observation that the design basis document was not being accurately maintained. Specifically. Section 3.2 of the inspection report identified six minor inconsistencies between statements in the updated final safety analysis report and actual plant conditions. Based on the relatively small sample of updated final safety analysis report statements verified during the inspection, and the fact that you have no measures to periodically verify the accuracy of the updated final safety analysis report: the failure to accurately implement the safety evaluations of 10 CFR 50.59 for minor changes to the facility has a greater significance. We request that you include in your response to the Notice a description of what actions, if any, you consider necessary to resolve this additional concern regarding the accuracy of the updated final safety analysis report. Please reply within 30 days of receipt of this letter with the above information, or your projected schedule to provide it.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice." a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Thomas P. Gwynn, Director Division of Reactor Safet

Dockets: 50-361

50-362

Licenses: NPF-10

NPF-15

Enclosures:

Notice of Violation
 NRC Inspection Report

50-361/95-26; 50-362/95-26

w/attachments

cc w/enclosures: County of San Diego ATTN: Chairman, Board of Supervisors 1600 Pacific Highway, Room 335 San Diego, California 92101

Rourke & Woodruff ATTN: Alan R. Watts. Esq. 701 S. Parker St. No. 7000 Orange, California 92668-4702

Public Utilities Department City of Riverside ATTN: Sherwin Harris, Resource Project Manager 3900 Main Street Riverside, California 92522

Southern California Edison Company San Onofre Nuclear Generating Station ATTN: R. W. Krieger, Vice President P.O. Box 128 San Clemente, California 92674-0128

California Department of Health Services
ATTN: Dr. Harvey Collins, Chief
Division of Drinking Water and
Environmental Management
P.O. Box 942732
Sacramento, California 94234-7320

San Diego Gas & Electric Company ATTN: Richard Krumvieda, Manager Nuclear Department P.O. Box 1831 San Diego, California 92112

Radiological Health Branch State Department of Health Services ATTN: Mr. Steve Hsu P.O. Box 942732 Sacramento, California 94234

City of San Clemente ATTN: Mayor 100 Avenida Presidio San Clemente, California 92672 E-Mail report to D. Nelson (DJN) E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IEO1)

bcc distrib. by RIV:

L. J. Callan DRS-PSB Branch Chief (DRP/F, WCFO) RIV File M. Hammond (PAO, WCFO) DRS AI 96-006

Resident Inspector MIS System Senior Project Inspector (DRP/F, WCFO) Branch Chief (DRP/TSS) Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

## DOCUMENT NAME:

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

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RMullikin/lb/	CVanDentorgh	TPGwynn (M)	/ DKirsch K	TPGwynn V/Y
01/10/96	01/10/98	01/6/96	01/19/96	01//7/96

OFFICIAL RECORD COPY

E-Mail report to D. Nelson (DJN) E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IEO1) \

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RMullikin/lb////	CVanDenBorgh	TPGwynn mv	DKirsch K	TPGwynn (7)
01/10/96	01/10/989	01/1/96	01/19/96	01/17/96