

ENCLOSURE 1

NOTICE OF VIOLATION

Southern California Edison Co.  
San Onofre Nuclear Generating Station

Dockets: 50-361  
50-362  
Licenses: NPF-10  
NPF-15

During an NRC inspection conducted on November 13 through December 1, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

Title 10, CFR 50.59(a)(1) allows licensees to make changes to the facility as described in the final safety analysis report without prior Commission approval unless the proposed change involves an unreviewed safety question. Title 10, CFR 50.59(b)(1) requires the licensee to maintain records of changes to the facility and that these records must include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Criterion V of Appendix B to 10 CFR Part 50, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Procedure S0123-XXIV-10.21, "Field Change Notice (FCN) and Field Interim Design Change Notice (FIDCN)," Revision 5, stated in the introduction that a change processed as a field design change shall not result in any change to the design bases described in the updated final safety analysis report. If it does, the change must be processed as a design change package according to Procedure S0123-XXIV-10.16, "Development, Review, Approval and Release of Conceptual Engineering Packages (CEPs) and Design Change Packages (DCPs) SONGS 1, 2 & 3."

Procedure S0123-XXIV-10.21, Section 2.2.6, required that if a minor change to the updated final safety analysis report was required then a change must be processed according to Procedure S0123-XXX-5.2, "Control of Licensing Document Changes and NRC Correspondence."

Updated Final Safety Analysis Report, Paragraph 9.3.7.1, "Design Bases," indicated that the design function of the flow-limiting orifice was to limit flow for postulated breaks downstream of the orifice so the mass flow rate of reactor coolant would be less than the makeup capacity of a single charging pump. Figure 9.3-15, "Reactor Coolant Gas Vent System Sketch," depicted the layout of the reactor coolant gas venting system and included the flow-limiting orifice.

Contrary to the above, on November 30, 1995, the inspectors identified the following two examples of the failure to follow procedures:

- A. The reactor coolant system gas vent flow-limiting orifice, described and depicted in the design bases of the Updated Final Safety Analysis Report, was replaced with an orifice gate valve by Field Change Notice F09329M. The field change notice, used in lieu of the design change package required by Procedure S0123-XXIV-10.16, did not provide for the performance of a safety evaluation of the design change.
- B. The Updated Final Safety Analysis Report was not changed, as required by Procedure S0123-XXX-5.2, to reflect the replacement of a flow-limiting orifice in the reactor coolant system gas vent with an orifice gate valve.

This is a Severity Level IV violation (Supplement I) (361; 362/9526-02).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Co. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because the response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if it necessary to include such information, it should clearly indicate the specific information that should not be placed in the PDR, and provide the legal basis to support the request for withholding the information from the public.

Dated at Arlington, Texas  
this 19th day of January 1996