

Dwight E. Nunn Vice President

January 30, 1996

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

Dear Sir:

- Subject: Docket Nos. 50-361 and 50-362 Reply to a Notice of Violation San Onofre Nuclear Generating Station, Units 2 and 3
- Reference: Letter, Thomas P. Gwynn (NRC) to Mr. Harold B. Ray (Edison), NRC Inspection Report 50-361/95-25; 50-362/95-25, dated December 22, 1995

The referenced NRC Inspection Report provided the results of a routine inspection conducted by Mr. A. B. Earnest on November 6-9, 1995. The enclosure to the referenced letter transmitted a Notice of Violation for the protected area (PA) intrusion detection system failures to detect attempted penetrations, by NRC contractor security specialists, into seven separate PA zones.

The failures were of two types: (1) one microwave and six e-field zones where the detection system was not properly maintained to ensure detection; and (2) one portion of a zone which did not have an adequate intrusion detection system.

For item (1) above, Edison believes the reason for the violation was the incomplete translation of system design and operating criteria into maintenance, testing, and operating procedures. For item (2) above, the NRC contractor security specialists identified a new penetration path which had not been previously recognized.

Edison promptly implemented appropriate compensatory security measures. For item (1), the microwave and e-field zones were restored to full effectiveness by alarm sensitivity adjustments and/or the modification of physical barriers to compensate for detection vulnerabilities (i.e., improved barrier material and surface leveling). For item (2), compensatory measures remain in effect until Edison completes installation of an additional intrusion detection system.

As long term corrective action, Edison is performing a comprehensive engineering evaluation of the intrusion detection system design and performance. Based on the results of this evaluation, further corrective actions may be taken, as appropriate.

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Full compliance was achieved on November 8, 1995, when compensatory measures and/or immediate corrective actions were implemented.

If you have any questions, please call me.

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cc:

L. J. Callan, Regional Administrator, NRC Region IV

- T. P. Gwynn, Director, Division of Reactor Safety, NRC Region IV J. E. Dyer, Director, Division of Reactor Projects, NRC Region IV
- K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
- J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3
- M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3