



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL Company

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February 16, 1996

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

Subject: Docket Nos. 50-361 and 50-362  
Inspection Report 95-201  
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, Robert M. Gallo (USNRC) to Mr. Harold B. Ray  
(Edison), "NRC Inspection Report 50-361/95-201 and  
50-362/95-201 (Final)," December 21, 1995

In Section 2.1 of the referenced letter, "Safety Focus and  
Management Involvement," page 11, paragraph 6, the Inspection  
Report (IR) states in part:

"In addition, the team identified some internal disagreement concerning performance of the operations department during the last several years. Operations management's position was that performance actually improved during the 1995 outages when compared to the last set of outages in 1993. Senior licensee management did not share that opinion and believed that the operator performance had declined. The team attributed this disagreement to ineffective communication and was concerned that without a uniform understanding of operational performance, efforts to address performance weaknesses could be misdirected."

Edison believes it is very important for management to have a common understanding of performance, and a shared purpose in improving that performance. The cited reference implies that Edison management did not share a common understanding of plant performance. Edison would like to clarify for the record that, in fact, there was not a disagreement between the Operations Manager (Dr. Ray Waldo) and me (referred to as Senior licensee management in the IR). During a meeting with Mr. Jacobson, IPAP Team Leader, Dr. Waldo and I discussed Operations' performance. In this meeting, I opined that operator performance during the SONGS Unit 2 Cycle 8 outage was not as good as performance during

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the operating period before the Cycle 8 outage [August 8, 1993 to February 11, 1995]. Dr. Waldo contrasted my statement; however, I agreed that the Unit 2 outage performance had improved compared to previous outages (i.e., Unit 2 Cycles 5, 6 and 7 outages). Mixing the discussion between "outage" performance [poor performance] and the performance "prior to the Unit 2 outage" during our 552 day world-record run [good performance] apparently gave the impression of disagreement. However, during the meeting, once we referenced the same time period, both Dr. Waldo and I agreed that the Operations Division's performance during the Unit 2 Cycle 8 outage had: 1) improved when compared to previous outages, and 2) decreased when compared to the operating period before the last Unit 2 Cycle 8 outage. I then instructed Dr. Waldo to review supporting data with Mr. Jacobson which, as I understand, was accomplished prior to the NRC's departure from the site. In summary, it appears that we didn't successfully communicate our shared position to the NRC.

I appreciate the opportunity to clarify the record. Edison will remain focused in our goals to maintain a high level of safety, and to continue to improve our Operations Division's performance.

If you have any questions or would like further information, please contact me.

Sincerely,



cc: L. J. Callan, Regional Administrator, NRC Region IV  
J. E. Dyer, Director, Division of Reactor Projects, NRC Region IV  
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