



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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

FEB 22 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: PROPOSED REVISION TO THE SAN ONOFRE NUCLEAR GENERATING STATION,
UNITS 2 AND 3, QUALITY ASSURANCE PROGRAM, BIENNIAL PROCEDURES REVIEW

We have reviewed the proposed revision to the San Onofre Nuclear Generating Station Quality Assurance Program submitted by your letter dated December 28, 1995. Your proposed change would eliminate your quality assurance program requirement for biennial reviews of procedures by taking credit for other existing processes. You determined that this change did not involve a reduction in commitment.

Our review has determined that the removal of the requirement to review all safety-related procedures no less frequently than every 2 years is a reduction in commitment of your quality assurance program as described in the San Onofre Quality Assurance Topical Report and, as such, requires NRC approval prior to implementation. Biennial reviews of procedures are important to determine the adequacy of current procedures and whether additional changes are necessary or desirable.

As you noted in Section 3.2 of the enclosure to your submittal, the Office of Nuclear Reactor Regulation (NRR) issued guidance for biennial plant procedure reviews in a letter dated December 21, 1992. We reviewed your proposed change using the guidance provided by NRR. On January 19 and 29, 1996, Mr. Robert Pate, of my staff, and Messrs. Derrick Mercurio, Garrett Sanders, and others of your staff, discussed the NRR guidance and how your submittal addressed each of the points of this guidance. We found that with the revisions and clarifications agreed to by members of your staff during the noted telephone conversations (see Enclosure), your submittal would adequately address each of the points of the guidance and meet the requirements of 10 CFR, Appendix B. With these stipulations, your submittal is approved.

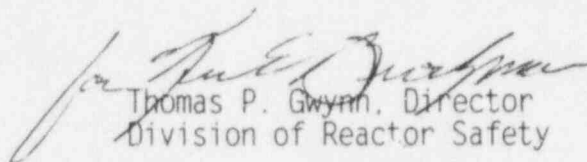
Additionally, during the telephone conversation, your staff stated that San Onofre Quality Assurance Topical Report, Table 17.2-1, "SCE Quality Assurance Program Compliance to Guides, Requirements, and Standards," Item 6, "Regulatory Guide 1.33 . . ." (pages 17.2-56), would be updated to include a reference to this letter, thus, clarifying your commitment to the ANSI N18.7-1976 procedure review requirements.

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Finally, the NRC staff does not consider proposed changes to the quality assurance program description or to the Final Safety Analysis Review submitted under 10 CFR 50.54(a) to be cost beneficial licensing actions as discussed in Attachment 1, "Questions and Answers," to NRC Administrative Letter 95-02, "Cost Beneficial Licensing Actions." These changes were specifically excluded from the cost beneficial licensing actions program. The provisions of 10 CFR 50.54(a) require changes to the quality assurance program description to be reviewed by the NRC within 60 days; therefore, cost beneficial licensing action status would not provide a more expedited review. License amendments submitted as part of the cost beneficial licensing actions program are evaluated on their technical merits as are other license amendments. As a result, your proposed revision to the San Onofre Quality Assurance Program has been reviewed consistent with 10 CFR 50.54(a) schedule requirements.

Any questions you may have concerning this review should be directed to Mr. C. A. VanDenburgh of my staff at (817) 860-8161.

Sincerely,


Thomas P. Gwyn, Director
Division of Reactor Safety

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

Enclosure:
Revisions and Clarifications to
Proposed Assurance Program Change

cc w/enclosure:
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1600 Pacific Highway, Room 335
San Diego, California 92101

Rourke & Woodruff
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Southern California Edison Company
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California Department of Health Services
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 MIS System
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 Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

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| RPATER <i>in Telecom</i> | R. Gramm <i>per E-Mail</i> | CVANDERBURGH | TGWYNN | JDYER | TGWYNN |
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ENCLOSURE

Revisions and Clarifications to Proposed Quality Assurance Program Change

1. Add the following statement to Section 3.2.(1) of the enclosure to the December 28, 1995, submittal to address the first point of the Office of Nuclear Reactor Regulation guidance.

"The configuration control process requires a review of all proposed design modifications by groups which are potentially affected by the proposed modification. This review requires that all procedures potentially affected be identified and reviewed and all required changes or revisions be made to the appropriate procedures in conjunction with the implementation of the design modification."

2. Modify the second sentence in the second paragraph of Section 3.2.(2) of the enclosure to the submittal, to address the second point of the Office of Nuclear Reactor Regulation guidance, to:

"The EOIs and AOIs and their associated Annunciator Response Procedures that are used at least every two years as part of the licensed operator requalification training will not require additional review provided all activities within the scope of the affected procedures are exercised during the conduct of such training."

3. Your submittal identified a number of processes which have been established to ensure that procedures are current and accurately reflect the plant design. We noted that a record is not maintained of all these reviews, although records of procedure revisions, procedure temporary change notices, and procedural editorial corrections are maintained. Modify Section 3.2.(4) of the enclosure to your submittal, to address the fourth point of the guidance to:

"Any routine procedure which has not been updated within the previous two years will be reviewed. Therefore, all routine procedures will be reviewed (or updated) at least every two years. The term updated refers to resetting the clock in the tracking system as a result of any procedure revision, procedure temporary change notice (TCN), or procedure editorial correction."