

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 February 11 through March 23, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violations are listed below:

- A. Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained covering the procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33 includes procedures for general plant operation and for operation of safety-related systems.

Technical Specification 6.8.2 requires that procedures of Technical Specification 6.8.1, and changes thereto, shall be approved by the Station Manager; or by (1) the Deputy Station Manager, (2) the Manager, Operations, (3) the Manager, Maintenance, (4) the Manager, Technical, or (5) the Manager, Health Physics, as previously designated by the Station Manager; prior to implementation.

Contrary to the above, the inspector identified that as of February 11, 1996, licensee processes for procedure changes and abnormal alignments failed to ensure compliance with the Technical Specification 6.8.2 requirement for management approval prior to implementation. A few examples of the failure to follow Technical Specification 6.8.2 for each process follows:

1. Temporary Change Notices 6-20, dated December 20, 1991; 6-21, dated January 17, 1992; 6-32, dated September 2, 1994; and 6-34, dated December 20, 1994, to Procedure S023-5-1.7, "Power Operations," were implemented prior to management approval required by Technical Specification 6.8.2. The licensee last revised Procedure S023-5-1.7 in 1988 and was using it with 36 temporary change notices. The licensee had no process which required that temporary change notices be further incorporated into procedures; therefore, the temporary changes notices were not temporary changes, but were in fact procedure changes, as addressed in Technical Specification 6.8.2.
2. Abnormal alignments 2-95-138, dated May 2, 1995; 2-95-140, dated May 2, 1995; and 2-95-141, dated May 3, 1995, contained unique operating and testing procedures for safety-related pumps and valves. These procedures were not approved prior to implementation as required by Technical Specification 6.8.2. The licensee process for abnormal alignments allowed the expansion of abnormal alignments into special

testing procedures without prior management approval required by
Technical Specification 6.8.2.

This is a Severity Level IV violation (Supplement I) applicable to
Units 2 and 3 (361, 362/96002-01).

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 is 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 //th day of April 1996