

Southern California Edison Company



SAN ONOFRE NUCLEAR GENERATING STATION

P.O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

J. G. HAYNES
STATION MANAGER

February 19, 1985

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U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. J. B. Martin, Regional Administrator

Subject: Docket Nos. 50-361 and 50-362
14-Day Follow-up Report
License Conditions 2.c.(14)a and 2.c.(12)a
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, J. G. Haynes (SCE) to J. B. Martin (USNRC), "Prompt Report,"
February 5, 1985

The referenced letter provided you with written confirmation of our prompt notification of a reportable occurrence involving deficiencies with fire-rated assemblies. Pursuant to License Condition 2.G to Facility Operating Licenses NFP-10 and NFP-15 for San Onofre Units 2 and 3, respectively, this submittal provides the 14-day Follow-up Report.

License Conditions 2.c.(14)a and 2.c.(12)a for Units 2 and 3, respectively, require that SCE maintain in effect and fully implement the Fire Protection Plan as delineated in the Fire Hazards Analysis (FHA). During the recent 18-month routine surveillance of over 2,000 fire-rated assemblies, deficiencies with penetration seals and cable wraps were identified. These deficiencies included missing or damaged penetration seals, seal shrinkage, and damaged cable wraps. In accordance with Technical Specification 3.7.9, Action Statement 'a', a compensatory firewatch was maintained or established within one hour of discovery of each discrepancy during the surveillance. In addition, Nonconformance Reports (NCR's) documenting these deficiencies, have been issued.

The cause of the missing or damaged seals cannot be determined; however, since the damage may have occurred during construction or maintenance activities in the area, the following corrective actions will be taken:

1. The missing or damaged seals will be repaired or replaced.
2. Fire barrier removal procedures will be revised to require additional inspection of all Technical Specification fire barriers following completion of work performed on the fire barriers.

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3. Fire barrier removal procedures will be revised to include a clear and precise method of identifying each penetration seal for which work is to be performed. This will eliminate the potential for inspecting the incorrect seal following installation.
4. All maintenance and construction personnel will be reminded of the importance to adhere to fire barrier removal procedures.
5. The surveillance of penetration seals has been expanded in accordance with Technical Specification Surveillance Requirement 4.7.9.2.c. Over 3,000 seals have been inspected to date, of which approximately 3% have been identified as being deficient.

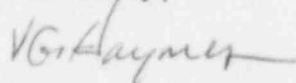
The cause of the seal shrinkage is under investigation. However, since the surveillance of penetration seals is being expanded, as described above, deficient seals will be replaced or repaired as appropriate. The cause of the damaged cable wraps could not be determined; however, the damage occurred in areas where personnel contact with the wraps is difficult to avoid. An evaluation of the damaged wraps will be performed and appropriate actions to limit personnel and equipment access to cable wraps will be taken.

Our surveillance of fire-rated assemblies is continuing and appropriate corrective action is being taken or is being evaluated and will be implemented as part of the dispositioning of all NCR's. Compensatory firewatches will remain in effect until the fire-rated assemblies are repaired.

The referenced letter indicated that we would provide a Licensee Event Report (LER), however, since we complied with the Action Statements and posted a firewatch upon discovery of the condition, in accordance with NUREG-1022, an LER is not required.

If you require additional information regarding the above, please so advise.

Sincerely,



cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)

Institute of Nuclear Power Operations (INPO)