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September 11, 1992

John B. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Gentlemen:

Subject: Docket No. 50-362
Emergency Operations Facility (EOF) Ventilation System
San Onofre Nuclear Generating Station, Unit 3

- References: 1. Letter, K. P. Baskin, SCE, to D. G. Eisenhut, NRC, (EOF) Ventilation System, Docket Nos. 50-206, 50-361 and 50-362, July 22, 1983.
2. Letter, M. O. Medford, SCE, to D. G. Eisenhut, NRC, (EOF) Ventilation System, Docket Nos. 50-206, 50-361 and 50-362, January 9, 1984.

Pursuant to the San Onofre Nuclear Generating Station, Unit 3 Facility Operating License NPF-15, License Condition 2.G, this letter constitutes the 14 day follow-up written report of an apparent violation of Unit 3 Full Power License Condition 2.C(24). Specifically we have determined that exhaust isolation dampers in the Emergency Operations Facility (EOF) ventilation system were not installed as required. This condition was reported to Region V by phone on August 28, 1992, by Walter C. Marsh, Assistant Manager, Nuclear Regulatory Affairs. Due to an administrative oversight during the preparation of this report, the 24 hour written follow-up to the telephone notification was not submitted.

Background

The San Onofre Unit 3 Low Power License NPF-15 was issued on November 15, 1982. License Condition 2.C.(17)(j) stated that "...the upgraded emergency support facilities shall be operational." In Reference 1, we further stated that: "...SCE has reviewed the EOF ventilation system design. As a result of the review, SCE has concluded that certain modifications are necessary to assure that the EOF ventilation system can be isolated. The modifications involve the installation of isolation dampers on all HVAC penetrations into the EOF." Upon issuance of the Full Power License on September 16, 1983

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License Condition No. 2.C(24) was added to the Facility Operating License. This stated "By January 1, 1984 the primary EOF ventilation system shall be modified to provide isolation capability as described in the SCE letter of July 22, 1983." In Reference 2, we informed the NRC that the EOF HVAC system had been modified by installing "...dampers on the penetrations for the EOF HVAC, (and) on the exhaust duct work for the EOF HVAC."

During testing performed in August of 1992 in response to IE Notice 92-32, it was found that EOF air leakage was above acceptable levels. Physical inspections of the EOF HVAC ductwork concluded on August 28 that the EOF HVAC isolation dampers were apparently installed only on the inlet side of the EOF HVAC system. We have been unable to establish, due to the length of time and lack of documentation since the modifications were made in 1983, the reason why isolation dampers were not also installed, as originally planned, on the exhaust side of the EOF HVAC system.

Corrective Actions

SCE will install isolation dampers on the exhaust side of the EOF HVAC system and make any other appropriate changes. These physical modifications will be completed by December 15, 1992. SCE maintains an alternate EOF which will be utilized in the event the primary EOF is rendered uninhabitable. Emergency Plan Implementing Procedures (EPIP) contain guidance for relocating to the alternate EOF. Training on this process was provided to EOF emergency response personnel.

Although we believe that this was an isolated installation error, we are conducting a special review of our commitments regarding the EOF. After we have compiled our EOF commitment listing, we will reverify completion of the commitments. If any additional discrepancies are discovered, we will provide supplemental reports as appropriate.

If there are any questions, please call me.

Sincerely,

John B. Martin
For RMR

cc: Document Control Desk, NRC
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3
M. B. Fields, NRC Project Manager, San Onofre Units 2 & 3