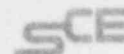


10/26/84

Southern California Edison Company



P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

DAVID J. FOGARTY
EXECUTIVE VICE PRESIDENT

TELEPHONE
818-302-2796

Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. R. C. DeYoung, Director

Dear Sir:

Subject: Docket No. 50-362
Payment of Civil Penalty
San Onofre Nuclear Generating Station, Unit 3

- References:
- (1) Letter, Mr. D. J. Fogarty (SCE) to Mr. R. C. DeYoung (NRC), "Response to Notice of Violation and Proposed Imposition of Civil Penalties," dated June 15, 1984
 - (2) Letter, Mr. H. B. Ray (SCE) to Mr. J. B. Martin (NRC), "Response to Special Team Inspection Report Number 50-206/84-16, 50-361/84-22 and 50-362/84-22," dated October 9, 1984
 - (3) Letter, Mr. D. J. Fogarty (SCE) to Mr. R. C. DeYoung (NRC), "Additional Response to Notice of Violation and Proposed Imposition of Civil Penalties," dated August 13, 1984

In accordance with the Order served on SCE by your letter dated September 24, 1984, enclosed is SCE check No. A-309364 dated September 28, 1984 in payment of the imposed civil penalty in the amount of One Hundred Twenty-five Thousand Dollars (\$125,000).

We appreciate your thoughtful response to Reference (1), which requested remission of the proposed civil penalty. We would like to affirm our commitment to the actions described in Reference (3) related to improvements in our management and supervisory effectiveness. We strongly believe these actions represent steps that make a very positive contribution to the quality of our operations.

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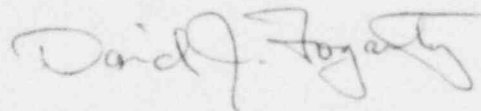
SCE

Each of the points included in your September 24, 1984 letter have been reviewed by Site Management. Based on that review, the question relative to when a procedure change approved in accordance with the Technical Specifications is or is not necessary continues to concern us. While we understand the NRC conclusion on this point, we have continued to review the matter and have discussed it at some length with regional inspection personnel and with other licensees. The results of our review to date are described in Reference (2). Specifically, while we are treating the use of partial checklists as a procedure change as indicated in Reference (1), we are uncertain how to define procedure changes requiring approval in accordance with the Technical Specifications in general. Accordingly, we are continuing our review of this subject as described in Reference (2).

We recognize the value of continued dialogue between plant licensees and the NRC and the importance of determining the proper interpretation of generic requirements on an industry basis outside of specific noncompliance circumstances. Recent meetings concerning fire protection and training represent examples of positive steps which we believe are very helpful. Accordingly, we would like to encourage a continuation of such meetings to permit an exchange of views and concepts relating to issues such as defining operability, defining procedure change, limiting deliberate entry into LCO 3.0.3 and other areas of interest.

If you require any additional information, please let me know.

Sincerely,



Enclosure

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