

ENCLOSURE 1

NOTICE OF VIOLATION

Southern California Edison Co.
San Onofre Nuclear Generating Station

Docket Nos.: 50-361
50-362
License Nos.: NPF-10
NPF-15

During an NRC inspection conducted on December 16-20, 1996, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 5.5.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, February 1978, Appendix A.

Regulatory Guide 1.33, Appendix A, Section 7.e.1, requires procedures for access control to radiation areas, including a radiation exposure permit system.

Procedure SO123-VII-20.11, "Access Control Program," Revision 3, states that individuals shall read, understand, and comply with the requirements listed on the Radiation Exposure Permit, on radiological postings, and on health physics field instructions.

Contrary to the above, between December 16-20, 1996, the inspectors discussed radiological work conditions with workers authorized to perform work in the containment building and determined that: (1) none of the workers knew the area contamination levels in their work areas, (2) some were not aware that they were working in a posted airborne area, and (3) none knew the airborne concentration levels.

This is a Severity Level IV violation (Supplement I) (50-361/-362/9619-01).

- B. Technical Specification 5.5.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, February 1978, Appendix A.

Regulatory Guide 1.33, Appendix A, Section 7.e.4, requires procedures for contamination control.

Procedure SO123-VII-20.9.2, "Material Release Surveys," Revision 1, states that site workers are responsible for presenting all items to health physics for removal from a radiological controlled area/radioactive materials area (RCA/RMA) and that health physics divisional personnel are responsible for performing surveys in accordance with this procedure to ensure that no licensed material is released from an RCA/RMA.

Contrary to the above, between August 1995 and December 16, 1996, the licensee identified 23 radioactive materials items outside the radiological controlled area. Seven of these items were identified with magenta paint or radioactive material tape.

This is a Severity Level IV violation (Supplement I) (50-361/-362/9619-02).

- C. 10 CFR 20.1904(a) requires that the licensee ensure that each container of licensed material bears a durable, clearly visible label bearing the radiation symbol and the words "CAUTION RADIOACTIVE MATERIAL," or "DANGER, RADIOACTIVE MATERIAL." The label must also provide sufficient information (such as the radionuclides present, an estimate of the quantity of radioactivity, the date for which the activity is estimated, radiation levels, kinds of materials, and mass enrichment) to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures.

Contrary to the above, on December 18, 1996, the inspectors identified six sealed cloth radioactive material bags (which contained eddy current probe pushers) that were not properly labeled.

This is a Severity Level IV violation (Supplement IV) (50-361/-362/9619-03).

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 your 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 you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 10th day of January, 1997