

SEP 25 1985

Docket Nos. 50-361 and 50-362

Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, California 91770

Attention: Mr. Kenneth P. Baskin, Vice President  
Nuclear Engineering, Safety and Licensing Department

Gentlemen:

Subject: NRC Inspection of San Onofre Units 2 and 3

This refers to the special team inspection conducted by Mr. W. Albert and other members of our staff on August 12-23, 1985 of activities authorized by NRC License Nos. NPF-10 and NPF-15, and to the discussion of our findings held by Messrs. A. Chaffee and W. Albert and other members of our staff with Mr. H. B. Ray and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

This inspection focused 60 percent of its effort upon your administrative controls associated with the AFWS, the emergency DGs, the HPSI and 125 VDC systems and the implementation and adherence of those controls in the following areas: Calibration Program; Maintenance Program; Surveillance Program; Vendor Field Change Notices; and Design Changes and Modifications. The other 40 percent of the team's effort was focused on administrative controls in the following areas: Onsite/Offsite Committee Activities; Quality Assurance Audits (onsite and offsite); Licensed/Non-Licensed Operator Training and Plant Operations.

#### Overall Conclusions

The strengths and weaknesses found in the areas examined are discussed in the attached inspection report and also in the paragraphs summarizing the inspection results (below). In general the team found your organization to be competently staffed with adequate management systems as evidenced by our review of your organization and your procedure systems. With the exception of your control over preparations for modification work and your use of work instructions or drawings when approved maintenance procedures do not exist, we found no significant problems with the procedures or the implementation of the procedures. Recent events at your Unit 1 regarding the auxiliary feed water pumps, subsequent to this inspection, indicate that your use of work instructions or drawings may not be adequate. Management involvement was evident in the reporting systems provided.

#### Areas Inspected and Results

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A. Maintenance

Our inspection of maintenance activities included review of the procedures controlling maintenance, review of selected records of completed maintenance, verification of Quality Control Inspector certification and evaluation of the timeliness of maintenance completion. A concern was identified relating to the potential for violation of Technical Specification requirements when approved maintenance procedures were not available. Although some marginal instances were noted, no clear-cut violations were identified in this area. In the other areas of the inspection of maintenance activities, no items of noncompliance or deviations were identified.

B. QA Audit Program

The quality assurance audit program as it relates to the operational and support activities at the San Onofre facilities was found to be well staffed, viable, and effective. The program appears to enjoy strong support of the senior management of the Southern California Edison Company.

C. Non-Licensed Staff Training

The inspectors reviewed the site non-licensed staff training program for conformance with applicable regulatory requirements, licensee commitments and industry standards. Training program implementation was also reviewed for compliance with training program descriptions. The inspectors concluded the non-licensed staff training program and its implementation met evaluation criteria, with the exception of training recordkeeping. During a record review of training received by selected individuals, the licensee was unable to directly relate documented training to training program requirements. However, at the NRC exit meeting, the licensee indicated a mechanism, not previously identified, was available to directly relate training records to program requirements. Accordingly, this item will be evaluated in a subsequent NRC inspection.

D. Procedures

The system for review, approval, and administrative control of procedures was examined to ascertain whether procedures were maintained in accordance with regulatory requirements. The technical content of selected procedures was compared to various documents describing the design operation of plant equipment. The inspectors concluded that strong administrative control of procedures existed and that the technical content of the procedures reviewed was consistent with the Final Safety Analysis Report, the Technical Specifications, and the Vendor Manuals. One observation was made regarding temporary change notices (TCN) to procedures. TCNs are allowed to remain effective indefinitely. The inspectors felt that timely incorporation of TCNs into procedures would be prudent for ease of usage and administrative control.

E. Measuring and Test Equipment

The Measuring and Test Equipment (M&TE) program was inspected to determine whether procedures were established and implemented for the calibration and control of M&TE used to test, calibrate and repair safety-related components and systems. The inspectors concluded that an adequate program existed and was being implemented to ensure the proper calibration and control of M&TE.

F. Technical Specification Surveillance

The licensee's surveillance programs for the auxiliary feedwater system, diesel generator system, 125 volt D.C. power system, and HPSI system were examined. The surveillances for these systems/equipment were verified by comparing them with those surveillances required by the Plant Technical Specifications. The program was sampled to determine the frequency and thoroughness of the surveillances being performed. It is concluded that the surveillance programs appear to be adequate and to function as designed.

G. Committee Activities

The intent of this inspection was to verify that the Nuclear Safety Group (NSG), the Onsite Review Committee (OSRC) and the Independent Safety Engineering Group (ISEG) were functioning in conformance with Technical Specification Requirements. The inspectors concluded that the groups were meeting their requirements. Strengths noted during the inspection were that, (1) QA audits were performed on all three groups within the past year to assure that they were meeting their requirements and (2) the OSRC chairman (Station Manager) had a major role in the discussions and decisions made by the OSRC in the meetings that the inspectors attended.

H. Plant Modifications

During the inspection a construction activity was observed which involved the erection of scaffolding above and on safety related electrical equipment. The inspectors questioned the conformance of this activity to applicable requirements. The NRC wished to examine other aspects of the situation. This area will be followed up by the resident inspection staff and reported on during a future inspection.

I. Vendor Field and Technical Manual Change Notices

The inspectors reviewed the administrative controls and plant records to assess the licensee's program to effectively identify, control, distribute, schedule and implement vendor technical manual changes for modifications and to ascertain that technical manuals are controlled and maintained current according to a document control program.

Several organizations are responsible for vendor manual change control depending on the type of change notices. Bechtel is also receiving some of the vendor's notices during this transition period. Overall, the licensee's program and implementation seemed adequate in this area. Deficiency identified by previous NUS audit appeared to be corrected.

No items of noncompliance with NRC requirements were identified within the scope of this inspection.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely,

Original signed by

D. F. Kirsch  
D. F. Kirsch, Acting Director  
Division of Reactor Safety and Projects

Enclosures:

Inspection Report Nos. 50-361/85-22 and 50-362/85-21

cc w/enclosure:

D. J. Fogarty, SCE  
H. B. Ray, SCE, San Clemente  
H. E. Morgan, SCE, San Clemente  
State of CA

bcc w/enclosure:

RSB/Document Control Desk (RIDS)  
Mr. Martin  
Mr. Faulkenberry  
Resident Inspector  
Greg Cook

bcc w/o enclosure:

LFMB

RV/dot

ALBERT	BOSTED	CRENS	D'ANGELO	HON	IVEY	A. JOHNSON
9/19/85	9/19/85	9/19/85	9/19/85	9/19/85	9/19/85	9/19/85
PADOVAN	RICHARDS	ZWETZIG	YOUNG	PATE	KIRSCH	
9/19/85	9/ /85	9/19/85	9/19/85	9/20/85	9/24/85	