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March 11, 1988

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-362
Reply to a Notice of Violation
San Onofre Nuclear Generating Station
Unit 3

Reference: Letter, Mr. D. R. Kirsch (NRC) to Mr. Kenneth P. Baskin (SCE), dated February 10, 1988

The above referenced letter forwarded a Notice of Violation resulting from the special inspection conducted by Messrs. A. Johnson, P. Johnson, and J. Tatum from August 3 through August 28, 1987, which was documented in the NRC Inspection Report No. 50-362/87-25. In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the subject Notice of Violation.

If you have any questions or require further information, please so advise.

Sincerely,

Kenneth P Baskin

Enclosure

cc: Mr. J. B. Martin (USNRC Regional Administrator, Region V)
Mr. F. R. Huey (USNRC Senior Resident Inspector)

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ENCLOSURE

REPLY TO A NOTICE OF VIOLATION

The enclosure to Mr. D. F. Kirsch's letter, dated February 10, 1988, states in part:

> "Section 3.3.2 of the San Onofre 3 Technical Specifications states that Engineered Safety Feature Actuation System (ESFAS) instrumentation channels shall be OPERABLE with RESPONSE TIMES as shown in Table 3.3-5. Table 3.3-5 specifies that the 'Steam Generator Pressure - Low' signal, which actuates main feedwater isolation valve (MFIV) 3HV-4048, shall have a response time of 10.9 seconds. Definition 1.12 of the Technical Specifications defines ENGINEERED SAFETY FEATURE RESPONSE TIME to be the time interval from when the monitored parameter exceeds its first actuation setpoint until the valve stem travels to its required position. No ACTION statement is provided in Section 3.3.2 or Table 3.3-5 to prescribe remedial measures when the requirement cannot be satisfied.
>
> "Section 3.0.3 of the Technical Specifications states that 'When a Limiting Condition for Operation is not met, except as provided in the associated Action requirements, within one hour, action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in: 1. At least HOT STANDBY within the next six hours.'
>
> "Contrary to the above requirements, MFIV 3HV-4048 was made inoperable by being physically blocked open on April 10, 1987, and again on April 24, 1987, for periods of approximately 8.5 and 8 hours, respectively. During these periods, the specified ESFAS response time of 10.9 seconds could not be satisfied for 3HV-4048, and action was not initiated within one hour to place the unit in a MODE in which the specification does not apply.
>
> "This is a Severity Level IV Violation (Supplement I) applicable to Unit 3."

RESPONSE

REASONS FOR THE VIOLATION

The main feedwater isolation valves are unique in that they are among a small group of actuated components with response times listed in Table 3.3-5 for which out of service times are not explicitly defined by other LCO's. The vast majority of actuated components can be taken out of service for periods ranging from four to 72 hours, under the provisions of these LCO's, without impacting the operability of the actuation instrumentation and invoking the one hour shutdown requirements of Specification 3.0.3.

Formerly, the FWIV's were subject to Technical Specification 3.6.3, "Containment Isolation Valves," which specified a four hour out of service time. Originally, Specification 3.6.3 was intended to address GDC 55 and 56 (double valve isolation) automatic containment isolation valves, not closed systems penetrating containment such as those associated with the main steam system. The main steam system related valves were included in Specification 3.6.3, without modification of the requirements to address single isolation valve closed systems, as a matter of practice when SONGS 2 and 3 were licensed. Consequently, Specification 3.6.3 did not appropriately address operability and action requirements for main steam system valves. This was resolved by license amendments which removed the main steam system related valves from Specification 3.6.3. While these amendments resolved problems associated with Specification 3.6.3, technical specifications no longer explicitly addressed the FWIV's, leaving questions of out of service times to judgment.

Prior to the April 10, 1987 removal from service of 3HV-4048, SCE recognized the need for explicit technical specification guidance for the FWIV's and other main steam system related valves. A license amendment request, providing a basis for a 72 hour action statement for the FWIV's, was being prepared. It was subsequently submitted for NRC review on December 14, 1987.

Based on the foregoing, SCE believed that there was no technical specification prohibition on the removal of valve 3HV-4048 from service. SCE considered that 72 hours was an appropriate administrative limit on FWIV out of service time. It is important to note that a further limit of eight hours was imposed on the work window, extension of which required Operations Manager approval. Additionally, the backup feedwater isolation valves (3HV-4047 and 3HV-1106) were available to isolate feedwater while 3HV-4048 was undergoing repairs. Since these valves remained operable, with their response times in full conformance with Technical Specification Table 3.3-5, SCE concluded that feedwater could be isolated, if necessary, while 3HV-4048 was undergoing repairs.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

SCE has issued a memorandum clarifying the actions to be taken for components listed in Technical Specification Table 3.3-5 for which LCO's do not exist. Specifically, in the future an inoperable component listed in this table (for which no LCO exists) shall be considered as entry into Technical Specification 3.0.3. Licensed personnel have been provided this memorandum.

On December 14, 1987, SCE submitted proposed License Amendment (mentioned above) Application Nos. 37/23, for Units 2 and 3, respectively. The Amendment Application, which is expected to be approved by NRR within the next few months, will provide specific Action requirements for 3HV-4048 (i.e., permitting the valve to be inoperable for up to 72 hours) and other components.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The actions taken above are sufficient to preclude recurrence.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on April 24, 1987, when valve 3HV-4048 was returned to OPERABLE status following maintenance on the valve.