

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 July 13-17, 1998, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, Revision 1, the violations are listed below:

A. Inadequate Compensatory Measures

10 CFR 73.55 (g)(1) states, in part, "All alarms, communications equipment, physical barriers, and other security related devices or equipment shall be maintained in operable condition. The licensee shall develop and employ compensatory measures including equipment, additional security personnel, and specific procedures to assure that the effectiveness of the security system is not reduced by failure or other contingencies affecting the operation of the security related equipment and structures."

License Condition 2.E of the San Onofre Nuclear Generating Station Operating License, dated August 25, 1988, requires, in part, that the licensee fully implement and maintain in effect all provisions of the Commission approved physical security plan. This includes amendments and changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

Paragraph 3.2.3 of the Physical security plan states, in part, "Upon identification of a failure to comply with this plan or its implementing procedures, security management will implement prompt corrective action to mitigate the consequences of system failure, to achieve equivalent protection, and to prevent recurrence." Further, Paragraph 3.2.4 states, in part, "SCE has established a management system that provides for the development, revision, implementation, and enforcement of security procedures. New procedures and revisions to current procedures are subject to the approval of the Manager, Site Security. All procedures are reviewed and updated annually in accordance with standard station policy."

Paragraph 6.6.3 of the Physical security plan states, in part, "An armed security officer/unarmed security personnel equipped with a radio observes the affected segment pending restoration of intrusion detection capability." Further, Paragraph 6.6.4 (VA Alarm Failure) states, in part, "In the event of a VA alarm system outage, the following compensatory measures will be taken: All VA card-key access portals are designed to fail locked and are inspected by an armed security officer or unarmed security personnel. Any portals found unlocked are secured with either a security padlock or a manned logging station is established. Armed security officers/unarmed security personnel equipped with access lists control access to such portals until the system is repaired and tested." At the bottom of the page which contained the above requirements, the physical security plan states, in part, "These measures will provide an equivalent level of intrusion detection protection pending prompt repair of the failed system."

Threat Event TS M4-D contained in the safeguards contingency plan requires the security organization to deploy the security force to compensate for failed computer channels. Further, under the data required section, it references preplanned scenarios for predesignated security post assignments and patrol routes contained in the shift commanders post order binder to compensate for the range of security computer failures.

Contrary to the above, during three events that occurred on May 20, July 29, and October 30, 1997, both security computers failed and adequate compensatory measures were not instituted in that security officers were not posted to control most of the vital area portals and the measures instituted did not ensure an equivalent level of protection. The licensee had not established specific procedures for the employment of compensatory measures resulting from a security computer failure.

This is a Severity Level IV violation (Supplement III) (50-361;-362/9812-03).

B. Inaccurate Information Submitted to the NRC

10 CFR 50.9(a) states, in part, "Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

Contrary to the above, during a predecisional enforcement conference in Region IV on January 20, 1998, and in a letter dated February 3, 1998, the licensee submitted information that indicated compensatory measures utilized during security computer failures on May 20, July 29, and October 30, 1998, were adequate in that responding security officers had all received patrol cards and that they had been trained on the use of the cards. Subsequent reviews performed by NRC identified that the above submittals were inaccurate in that patrol cards had not been issued and training on the use of the cards had not been completed. The licensee reached the same conclusion subsequent to being notified by the inspection staff. This information was material to NRC because it was needed to determine whether adequate compensatory measures were implemented in accordance with the licensee's NRC approved physical security plan. A letter to the NRC from the licensee, dated February 24, 1998, concluded that the information submitted was inaccurate and corrected the information.

This is a Severity Level IV violation (Supplement VII) (50-361;-362/9812-04).

Pursuant to the provisions of 10 CFR 2.201, for Violation B, 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 or severity level, (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.

For Violation A, the NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved is already adequately addressed on the docket in NRC Inspection Report 50-361/98-12; 50-362/98-12. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 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).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001.

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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas,
this 7th day of October 1998.