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Dwight E. Nunn
Vice President

November 6, 1998

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, Mr. Arthur T. Howell (USNRC) to Mr. Harold B. Ray
(SCE), dated October 7, 1998

The Referenced letter transmitted the results of NRC Inspection Report No. 50-361/98-12 and 50-362/98-12, conducted July 13-17, 1998, at Southern California Edison's (SCE), San Onofre Nuclear Generating Station, Units 2 and 3. The enclosure to the Referenced letter also transmitted a Notice of Violation containing two violations (9812-03 and 04). These violations involved: (A) a violation for inadequate compensatory measures during the loss of both security computers; and (B) a violation for providing inaccurate information to the NRC regarding the aforementioned inadequate compensatory measures.

For Violation (A), the NRC concluded that information regarding the reason for the violation, and the corrective actions taken and planned to correct the violation and prevent recurrence, is already adequately addressed on the docket, and therefore a response is not required. Enclosure 1 to this letter provides SCE's reply to Violation (B).

If you have any further questions, please contact me.

Sincerely,

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G PDR

Enclosure: As stated

cc: E. W. Merschhoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3
J. W. Clifford, NRC Project Manager, San Onofre Units 2 and 3

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**ENCLOSURE 1
REPLY TO A NOTICE OF VIOLATION**

The enclosure to Mr. A. T. Howell's letter dated October 7, 1998, states, in part:

VIOLATION B

"B. Inaccurate Information Submitted to the NRC

"10CFR50.9(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 (sic), 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 the 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)."

1. Reason for the Violation

The inaccurate information provided in the February 3, 1998, letter was attributed to personnel error in not adequately verifying the completion of compensatory measure training and distribution of training aids (i.e., patrol route cards). Although the training and distribution of training aids activities were directed to be taken, SCE failed to verify that these actions had been completed before they were made statements of fact in the February 3, 1998, letter. After the letter was submitted to the NRC, SCE became aware that the actions had not been effectively implemented.

2. Corrective Actions Taken and the Results Achieved

The following corrective actions have been implemented:

- On February 12, 1998, the Nuclear Regulatory Affairs' (NRA) Compliance Manager contacted NRC Region IV management and requested that the February 3, 1998, letter, be retracted. SCE submitted a letter on February 24, 1998, providing corrected information.
- Appropriate disciplinary action was taken on the applicable individuals involved.
- Several specific corrective actions were taken to raise SCE personnel awareness of the importance of ensuring the accuracy of all information submitted to the NRC:
 - Training classes on standards of nuclear communications were conducted with uniformed Security Shift Supervisors, and nonuniformed Security staff members. The training stressed the expectation that information transmitted within the Security Division must be accurate and factual.
 - The NRA Compliance and Licensing Managers issued a memo dated February 19, 1998, to all NRA personnel reiterating and reemphasizing the instructions for the review and approval of all NRC correspondence.
 - The Nuclear Oversight Division (NOD) Manager issued a memo dated March 17, 1998, to all Nuclear Organization Managers and Supervisors reiterating the importance of ensuring that information provided to the NRC is accurate and factual.
 - The Vice President, Engineering and Technical Services, made a presentation at an SCE Management Forum on April 7, 1998, regarding "Accuracy and Verification of Information Submitted to the NRC."
 - SONGS' Vice Presidents issued a joint memo dated July 2, 1998, to all site personnel providing an overview of the event and emphasizing the corrective actions (i.e., accuracy of information provided to NRC).

- NOD performed reviews on the majority of NRC Correspondence (the Licensee Event Reports, responses to Notices of Violations, and other similar correspondence) sent to the NRC over the previous 12 month period (3/97-3/98). (Review of 234 statements of fact identified 7 minor inconsistencies, none of which required revision of the original submittal.)
- NRA implemented an enhancement to its process for verifying the accuracy of information in NRC correspondence by establishing guidance for the preparation of "objective evidence files" (OEFs). The OEF includes supplemental documentation (i.e., in addition to NRA normal requirements for verifying statements of fact) to support all statements of fact included in NRC correspondence, and will continue until such time that confidence in the information provided for NRC correspondence is restored.

In order to provide a continual assessment of the effectiveness of the corrective actions, NOD assigned a manager to oversee the review of LERs, NOV's, and miscellaneous correspondence sent to the NRC on and after February 26, 1998. To date, these reviews have only revealed minor corrections that would not have changed any of the conclusions in the document being transmitted to the NRC. These reviews will continue until such time that confidence in the information provided for NRC correspondence is restored.

3. Corrective Actions That Will be Taken

NOD developed a training video highlighting this event that will be required as part of SONGS' security badging process for the period November 1, 1998, through October 31, 1999.

4. Date When Full Compliance Will be Achieved

Full compliance was achieved on February 12, 1998, when SCE notified the NRC of the error in the subject letter and requested the letter be withdrawn.