



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

November 12, 1998

EA 98-226

Harold B. Ray, Executive Vice President
Southern California Edison Co.
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: EXERCISE OF ENFORCEMENT DISCRETION
(NRC INSPECTION REPORT NO. 50-361/98-05; 50-362/98-05)

Dear Mr. Ray:

This is in reference to the letter from Dwight Nunn, Vice President, Engineering and Technical Support, dated June 22, 1998, which was submitted in response to the referenced NRC inspection report issued on May 21, 1998. The inspection report described an apparent violation of San Onofre Nuclear Generating Station technical specifications and informed you that the NRC was considering escalated enforcement action. Southern California Edison (SCE) was given a choice of responding to the apparent violation in writing or requesting a predecisional enforcement conference. Mr. Nunn's letter provided SCE's written response to the apparent violation.

The apparent violation, which SCE identified when replacing reversing linestarters, was caused by the failure of a reversing linestarter associated with the Train A motor-operated, containment emergency sump outlet valve. With this valve unable to open on a containment sump recirculation actuation signal, and with the Train B recirculation system unavailable due to planned maintenance, San Onofre was operated for a period of approximately 27 hours in January 1998 with no post-accident recirculation capability available, contrary to the requirements of the plant's technical specifications.

In its May 21, 1998 letter, the NRC asked SCE to provide information to support its position that the linestarter failure was not avoidable by reasonable quality assurance measures or management controls,¹ whether there were prior opportunities to detect and correct the condition that rendered the linestarter inoperable, and whether other equipment could be affected by this condition.

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¹The "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy) NUREG-1600, Revision 1, states that the NRC may refrain from issuing enforcement action for violations resulting from matters not within a licensee's control, such as equipment failures that were not avoidable by reasonable quality assurance measures or management controls.

SCE provided detailed information in response to each of these concerns. In its June 22, 1998 letter, and as earlier reported to the NRC on March 9, 1998 in Licensee Event Report (LER) 98-003, SCE attributed the linestarter failure to a fine aerosol grit deposited during construction activities prior to plant startup. SCE stated that the grit, which was indistinguishable from common dust to the naked eye, caused a mechanical interlock on the linestarter to jam, rendering it and the associated emergency sump outlet valve inoperable. SCE noted that it found this condition during the planned replacement of the mechanical interlock on the linestarter, and that SCE conducted an extensive root cause analysis to determine the cause of the failure. SCE noted that the failed interlock had been installed more than 20 years ago and is conservatively estimated to have had more than 100 successful actuations prior to being found in the failed condition. In addition, SCE noted that there are 172 reversing linestarters with the same type of mechanical interlock and that there have been more than 17,000 successful actuations with only one failure due to grit.

SCE also stated in its June 22 letter and attachments that SCE's quality assurance and management controls of activities during plant construction were consistent with NRC and industry standards, that it complied with preventive maintenance and surveillance requirements associated with the linestarters, and that there were no overlooked opportunities to detect and correct the condition that rendered the linestarter inoperable. Finally, SCE stated that there is no other plant equipment affected by this condition.

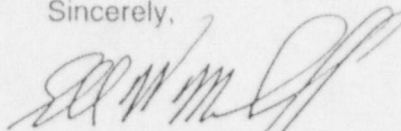
The NRC has completed its review of the information provided by SCE. We note that given the loss of function of this safety system, this violation would normally have been categorized at Severity Level II in accordance with the Enforcement Policy. However, the event involved the only known failure of a linestarter due to grit in approximately 16 years of plant operation, indicating that this failure was isolated. Further, the risk significance was lessened by the relatively short duration of the loss of safety function (approximately 27 hours) and the recovery potential by plant personnel. Based on these considerations, the NRC has concluded that this issue is more appropriately classified at Severity Level III.

However, we acknowledge that the failure was discovered by SCE during planned replacement of linestarters, and the issue was aggressively pursued by SCE to determine the root cause. We agree with SCE's conclusion that this failure was not likely to have been prevented by reasonable quality assurance activities and other management controls. Therefore, after consultation with the Director, Office of Enforcement and the Deputy Executive Director for Regulatory Effectiveness, and in accordance with Section VII.B.6 of the NRC's Enforcement Policy, the NRC is exercising its enforcement discretion to not propose a civil penalty and to not cite the violation in this case.

Please contact Mr. Thomas P. Gwynn of my staff at (817) 860-8248 if you have any further questions about this matter.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,



Ellis W. Merschoff
Regional Administrator

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