

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Unit 3

Docket No. 50-362
License No. NPF-15

During an NRC inspection conducted on August 3 through August 28, 1987 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

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 actuation setpoint until the valve 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 6 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.

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector, San Onofre Nuclear Generating Station, within 30 days of the date of the letter transmitting this 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 if admitted, (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. If an adequate reply is not

received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

D.F. Kirsch

D. F. Kirsch, Director

Division of Reactor Safety & Projects

Dated at Walnut Creek, California
this 10th day of February 1988