



SOUTHERN CALIFORNIA  
**EDISON**

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Manager of  
Nuclear Regulatory Affairs

January 26, 1999

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 January 7, 1999

The referenced Inspection Report and Notice of Violation cover letter indicates "... you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position." Southern California Edison (SCE) has reviewed the Inspection Report and while the report does accurately reflect SCE's position relative to the violations themselves, SCE would like to clarify two of the corrective actions associated with the first violation mentioned in the Inspection Report (Violation 50-361/9822-01).

The first violation occurred during the week of the inspection, and involved the detachment of a high radiation area sign and rope barrier for a short period of time. As a part of the corrective actions which were developed prior to the inspector leaving the site, a standown of appropriate contract workers was to be conducted and an article discussing the occurrence was to be placed in the site news letter.

Relative to the standown, during discussions with the inspector the impression was given that all contractors would participate in the standown and that the Maintenance Manager, Construction Manager, and the Radiation Protection Manager would discuss the occurrence and the importance of complying with radiation protection work requirements. The inspection report reflects this and it further states that the standown was conducted on December 15, 1998.

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The standown was implemented as follows:

- The SONGS Maintenance Manager, Construction Manager, and the Radiation Protection Manager met with Bechtel Construction Company (BCC) non-manual field engineers, superintendents, general foremen and foremen, and conducted "stand-down training" on December 15, 1998.
- On December 15, 1998, standowns of approximately 300 BCC craft, BCC non-manual and nuclear construction non-manual personnel who are involved in field activities were conducted by the above trained personnel.


The importance of maintaining radiological barriers and complying with radiation protection work requirements was reiterated in a January 1, 1999, Health Physics Bulletin to RCA Personnel as well as a January 11, 1999, site news letter article. As discussed in the Inspection Report, SCE is conducting a review of radiation worker practices and root cause analysis of associated problems [referred to as an Event Trend Report (ETR)]. The ETR is currently scheduled for completion by the end of February, 1999. Additional corrective actions may be taken if deemed appropriate.

Relative to the news letter article, the information given to the inspector and reflected in the Inspection Report was that the article would appear in the January 4, 1999, edition. The article appeared in the January 11, 1999, news letter rather than the January 4, 1999 edition.

SCE does not believe that these clarifications change the characterization of the violations.

If you have any questions, please contact us.

Sincerely,



cc: E. W. Merschoff, Regional Administrator, NRC Region IV  
L. J. Smith, Acting Chief, Branch E Division of Reactor Projects  
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