

NOTICE OF VIOLATION

Southern California Edison Co.
San Onofre Nuclear Generating Station

Docket Nos.: 50-361; 50-362
License Nos.: NPF-10; NPF-15
EA 97-585

During an NRC inspection conducted on November 17 through December 5, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 73.21(b)(1)(viii) requires that the composite safeguards contingency plan for the facility or site will be protected as safeguards information. 10 CFR 73.21(d)(1) and (2) require that safeguards information shall be under the control of an authorized individual or if in storage, shall be locked in an a locked security storage container.

Contrary to the above, on October 27, 1997, the licensee discovered and reported that a copy of the composite safeguards contingency plan was lost, i.e., not under the control of an authorized individual or locked in a locked security storage container. The plan was missing from the safeguards storage container in the security operations office, located outside the protected area. A search of the site did not result in the discovery of the safeguards document. (01013)

This is a Severity Level III violation (Supplement III).

- B. License Condition 2.E of the San Onofre Nuclear Generating Station Operating License dated August 25, 1988, requires, in part, that the license 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).

1. Paragraph 9.2 of the physical security plan states, in part, "Additional unloaded weapon locations, secured inside locked storage containers, are described in the security contingency plan." Paragraph 3.4.5 of the security contingency plan states, in part, "Weapons and ammunition are secured in fixed and mobile strategically located containers."

Contrary to the above, on July 30 and November 7, 1997, security officers discovered weapons and ammunition that were not secured. Specifically, in each instance, security officers found that a safeguards contingency cabinet was unlocked and unattended. The contingency cabinets contained weapons and ammunition and were unsecured for several hours. (02014)

This is a Severity Level IV violation (Supplement III).

2. Paragraph 3.2.4 of the physical security plan states, in part, "SCE has established a management system that provides for the development, implementation, and enforcement of security procedures." Paragraph B.14 of Security Procedure SO123-IV-11.2 (Attachment 2, 1-Hour Reportability Criteria), "Loss or Unattended Weapon in the Protected Area, requires that the following be reported to the NRC: "Any weapon which becomes lost or out of the control or physical custody of security personnel for any length of time. The 10 minute rule is not applicable."

Contrary to the above, on July 30, 1997, Security Procedure SO123-IV-11.2 was not adequately implemented when no 1-hour report was made to the NRC upon discovery of a weapon which was out of the control or physical custody of security personnel for several hours. Specifically, a contingency weapon container located inside the protected area, with a weapon and ammunition inside, was unlocked and unattended. The incident was logged in the safeguards event logs instead of being reported within 1-hour to the NRC. (03014)

This is a Severity Level IV violation (Supplement III).

3. Paragraph 6.3.4 of the physical security plan requires that intrusion detection system units will be powered by either station power, with a 4-hour rated, self-contained battery for backup power supply, or station uninterruptible power supply.

Contrary to the above, between July 31 and October 29, 1997, Guardwire GIV-645, a portion of the intrusion detection system unit, was powered by station power without a 4-hour rated, self-contained battery for backup power supply. Also, it was not powered by station uninterruptible power supply. (04014)

This is a Severity Level IV violation (Supplement III).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison (Licensee) 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, 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.

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, DC 20555-0001.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

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, TX
this 18th day of February 1998