ENCLOSURE 1

NOTICE OF VIOLATION

Southern California Edison Co.	Docket No.:	50-361 50-362
San Onofre Nuclear Generating Station Units 2 and 3	License No.:	NPF-10 NPF-15 EA 97-353

During an NRC inspection conducted on June 2-13, and August 4-7, 1997, one violation (with multiple examples) of NRC requirements was identified. This violation involved the failure to meet Technical Specification Surveillance Requirements upon implementation of the improved Technical Specifications. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

> Technical Specification 5.5.1.1.a requires that applicable procedures as recommended in Regulatory Guide 1.33, Revision 2, Appendix A, dated February 1978 be established.
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> Regulatory Guide 1.33, Revision 2, Appendix A, dated February 1978, requires appropriate written procedures for each test, inspection or calibration listed in the Technical Specifications.
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> Contrary to the above, from August 5, 1996, until February 15, 1997, a number of surveillance procedures, as evidenced by the examples documented below, were not appropriate because they did not demonstrate satisfaction of the Technical Specification Surveillance Requirements.
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> 1. Units 2 and 3 Improved Technical Specification Surveillance Requirement 3.8.1.14 requires that, every 24 months, the licensee verify each emergency diesel generator "when operating with the maximum kVAR loading permitted during testing, operates for ≥ 24 hours, for ≥ 2 hours loaded ≥ 4935 kW and ≤ 5170 kW; and for the remaining hours of the test loaded ≥ 4450 kW and ≤ 4700 kW." Technical Specification 3.8.1 is applicable in Modes 1, 2, 3, and 4. Units 2 and 3 Improved Technical Specification Surveillance Requirement 3.8.2.1 requires that, for alternating current sources required to be OPERABLE, the surveillance requirements of Technical Specification 3.8.1, "AC Sources-Operating," except Surveillance Requirements 3.8.1.17 and 3.8.1.20, are applicable. Improved Technical Specification 3.8.2 is applicable in Modes 5 and 6, and during movement of irradiated fuel assemblies.
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>   From August 5 until December 1, 1996, for Emergency Diesel Generators 3G002 and 3G003, and from August 5, 1996, until January 12, 1997, for Emergency Diesel Generators 2G002 and 2G003, Procedures SO23-3-3.27.2, "Weekly Electrical Bus Surveillance," Revision 5, and SO23-3-3.23.1, "Diesel Generator Refueling Interval Tests," Revision 8,

issued August 5, 1996, had not required the verification that the emergency diesel generators operate for the remainder of the test loaded ≥ 4450 kW and ≤ 4700 kW. The emergency diesel generators were instead loaded > 4700 kW for the remainder of the tests. Unit 2 was operated in Modes 1 through 4 from August 5 until December 1, 1996, in Modes 5 and 6 from December 2 until December 16, 1996, and again in Mode 6 from January 8 until January 9, 1997. Unit 3 was operated in Modes 1 through 5 during the entire period.

2. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.1.15 requires that, every 24 months, the licensee verify that within 5 minutes of having been shut down "after operating ≥ 2 hours loaded ≥ 4450 kW and ≤ 4700 kW," each emergency diesel generator "starts and achieves, in ≤ 10 seconds, voltage ≥ 3924 V and ≤ 4796 V, and frequency ≥ 58.8 Hz and ≤ 61.2 Hz; and operates ≥ 5 minutes." Technical Specification 3.8.1 is applicable in Modes 1, 2, 3, and 4. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.2.1 requires that, for alternating current sources required to be OPERABLE, the surveillance requirements of Specification 3.8.1, "AC Sources-Operating," except Surveillance Requirement 3.8.1.17 and Surveillance Requirement 3.8.1.20, are applicable. Improved Technical Specification 3.8.2 is applicable in Modes 5 and 6, and during movement of irradiated fuel assemblies.

   From August 5 until December 1, 1996, for Emergency Diesel Generators 2G002 and 2G003, and from August 5, 1996, until January 12, 1997, for Emergency Diesel Generators 3G002 and 3G003, Procedures SO23-3-3.27.2, "Weekly Electrical Bus Surveillance," Revision 5, and SO23-3-3.23.1, "Diesel Generator Refueling Interval Tests," Revision 8, issued August 5, 1996, had not required the verification that the emergency diesel generators started and achieved the voltage and frequency specified within 5 minutes of having been shutdown "after operating ≥ 2 hours loaded ≥ 4450 kW and ≤ 4700 kW." Instead, the emergency diesel generators had instead been loaded > 4700 kW, the allowed maximum, for the 2 hours prior to being shutdown for the test. Unit 2 was operated in Modes 1 through 4 from August 5 until December 1, 1996, in Modes 5 and 6 from December 2-16, 1996, and again in Mode 6 from January 8-9, 1997. Unit 3 was operated in Modes 1 through 5 during the entire period.

3. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.1.5.4 requires that, every 24 months, the licensee perform a CHANNEL FUNCTIONAL TEST of each reed switch position transmitter channel. Improved Technical Specification 3.1.5 is applicable in Modes 1 and 2.

From August 5 until November 30, 1996 (for Unit 2) and from August 5, 1996, until February 5, 1997 (for Unit 3), Procedure SO23-3-3.5, "CEA/Reactor Trip Circuit Breaker Operability Testing," Revision 6, issued August 5, 1996, had not required the independent performance of a channel functional test of each reed switch position transmitter indicator channel. Unit 2 was operated in Mode 1 from August 5 until November 30, 1996. Unit 3 was operated in Modes 1 and 2 from August 5 until September 23, 1996, and from October 12, 1996, until February 5, 1997.

4. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.1.3 requires that, every 31 days, the licensee verify that each emergency diesel generator synchronizes, loads, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW. Improved Technical Specification 3.8.1 is applicable in Modes 1, 2, 3, and 4.

   From August 5-14, 1996 (Emergency Diesel Generator 2G002), August 28, 1996 (Emergency Diesel Generator 2G003), August 21, 1996 (Emergency Diesel Generator 3G002), and August 8, 1996 (Emergency Diesel Generator 3G003), Procedure SO23-3-3.23, "Diesel Generator Monthly Test," Revision 9, issued August 5, 1996, had not required the synchronization and loading of the emergency diesel generators ≥ 4450 kW and ≤ 4700 kW, and operated them for ≥ 60 minutes. The emergency diesel generators were instead loaded > 4700 kW for the tests. Units 2 and 3 were operated in Mode 1 during this period.

5. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.1.10 requires that, every 24 months, the licensee verify that each emergency diesel generator, when operating with design basis kW loading and maximum kVAR loading permitted during testing, does not trip and voltage is maintained ≤ 5450 V during and following a load rejection of ≥ 4450 kW and ≤ 4700 kW. Improved Technical Specification 3.8.1 is applicable in Modes 1, 2, 3, and 4. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.2.1 requires that, for alternating current sources required to be OPERABLE, the surveillance requirements of Specification 3.8.1, "AC Sources-Operating," except Surveillance Requirement 3.8.1.17 and Surveillance Requirement 3.8.1.20, are applicable. Improved Technical Specification 3.8.2 is applicable in Modes 5 and 6, and during movement of irradiated fuel assemblies.

   From August 5 until December 1, 1996 (Unit 2) and January 12, 1997 (Unit 3), Procedures SO23-3-3.27.2, "Weekly Electrical Bus Surveillance," Revision 5, and SO23-3-3.23.1, "Diesel Generator Refueling Interval Tests," Revision 8, issued August 5, 1996, did not require verification that the emergency diesel generator did not trip and voltage was maintained following a load rejection of ≥ 4450 kW and ≤ 4700 kW. The load actually rejected for each emergency diesel generator was > 4700 kW. Unit 2 was operated

in Modes 1 through 4 during that period. Unit 3 was operated in Modes 1 through 4 from August 5 until September 23, 1996, and from October 12, 1996, until April 13, 1997.

6. Units 2 and 3 old Technical Specification Surveillance Requirement 4.3.2.3 required that the engineered safety features response time of each engineered safety feature actuation system function shall be demonstrated to be within the limit at least once per refueling interval. The prior, or old, Technical Specification 3.3.2 was applicable in Modes 1, 2, 3, and 4 (component-specific applicability).

   Units 2 and 3 improved Technical Specification Surveillance Requirement 3.3.5.6 requires that, every 24 months on a staggered test basis, the licensee verify engineered safety features response time is within limits. Improved Technical Specification 3.3.5 is applicable in Modes 1, 2, 3, and 4 (component-specific applicability).

   From approximately 1983 until November 30, 1996 (Unit 2), and from approximately 1984 until February 15, 1997 (Unit 3), SO23-3-3.12, "Integrated ESF System Refueling Test," Revision 12, issued August 5, 1996, did not demonstrate the engineered safety features response times to be within limits, in that, the actual response time of a portion of each circuit (the "K" relay) was not measured. Units 2 and 3 were operated in Modes 1 through 4 during this period.

This is a Severity Level IV violation (Supplement I)(50-361;-362/9711-01).

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence and the date when full compliance was achieved is already adequately addressed on the docket in NRC Inspection Reports 50-361;-362/97-02, 50-361;-362/97-09 and herein; and Licensee Event Reports 2-97-001-01, -02, and -03 and 2-96-009-01. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it 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 San Onofre, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Dated at Arlington, Texas
this 20th day of August 1997