

SEP 1 1987

Docket Nos. 50-206, 50-361, 50-362

Southern California Edison Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 92770

Attention: Mr. Kenneth P. Baskin, Vice President
Nuclear Engineering Safety and Licensing

Gentlemen:

This refers to the routine inspection conducted by Messrs. F. R. Huey, J. E. Tatum, and A. L. Hon of this office during the period of May 24 through July 4, 1987 of activities authorized by NRC License Nos. DPR-13, NPF-10 and NPF-15 and to the discussion of our findings held by the inspectors with Mr. H. B. Ray and other members of the Southern California Edison (SCE) staff at the conclusion of the inspection.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

As previously discussed in inspection report 50-206/87-03 and in paragraph 9.d of the enclosed report, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A.

During the exit interview at which the proposed Notice of Violation involving station housekeeping was discussed, SCE management identified an intent to revise existing station housekeeping procedures to delete specific quantitative standards associated with housekeeping requirements. These changes would apparently place increased reliance on first line supervision, which our inspection staff does not consider to have been fully effective in maintaining housekeeping standards under the more specific existing program. The SCE staff stated that this intended action was in response to what SCE considers to be unwarranted NRC enforcement actions related to violation of station procedures which SCE believes are more restrictive than the requirements intended by NRC regulations. However, we believe the discrepancies cited in the enclosed Notice of Violation indicate weakness and a need for improved performance in the areas identified. It is of concern to the NRC that SCE appears to be placing more emphasis on eliminating the risk of enforcement action than on the aggressive implementation of an existing program which has been satisfactorily implemented in the past. SCE is requested to specifically address this concern in their response to the proposed Notice of Violation.

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Your response to this Notice is to be submitted in accordance with the provisions of 10 CFR 2.201 as stated in Appendix A, Notice of Violation.

In accordance with 10 CFR 2.790(a), a copy of this letter, the enclosure, and your response will be placed in the NRC Public Document Room.

The response directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely,

Original Signed

R. P. Zimmerman, Chief
Reactor Projects Branch

Enclosures:

1. Notice of Violation
2. Inspection Reports:
Nos. 50-206/87-14, 50-361/87-13, 50-362/87-15
3. Safety System Availability Tables

cc w/enclosures:

D. J. Fogarty, Executive Vice President
H. B. Ray, Vice President (San Clemente)
H. E. Morgan, Station Manager (San Clemente)
State of California

bcc w/enclosures:

RSB/Document Control Desk (RIDS) (IE01)
docket file
G. Cook
B. Faulkenberry
J. Martin
Project Inspector
Resident Inspector

bcc w/o enclosures 2 and 3:

J. Zollicoffer
M. Smith

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REGION V
FHUW/noack

for JTatum

for AHon

for PJJohnson

for AJJohnson

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
8/31/87	8/31/87	8/31/87	8/31/87	8/31/87

for RZ Zimmerman

REQUEST COPY
YES / NO

SEND TO PDR
YES / NO 9/1 /87

NDU only