



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

January 6, 2009

Ross T. Ridenoure,  
Senior Vice President and  
Chief Nuclear Officer  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

SUBJECT: ERRATA FOR SAN ONOFRE NUCLEAR GENERATING STATION – NRC  
COMPONENT DESIGN BASIS INSPECTION REPORT, 05000361/2008010  
AND 05000362/2008010

Dear Mr. Ridenoure:

Please replace page 18 of the report with the enclosed page 18 of the Report Details section in NRC Inspection Report 05000361/2008010 and 05000362/2008010, dated October 24, 2008. This enclosed page has the cross-cutting element removed from the details section of the report for NCV 05000361/2008010-04. This typographical error was not included in the Summary of Findings section of the original report or the Plant Issues Matrix document that the NRC uses to track cross-cutting elements for each finding.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Tom Farnholtz, Chief  
Engineering Branch 1  
Division of Reactor Safety

Docket: 50-361, 50-362  
License: NPF-10, NPF 15

Enclosure:  
Errata to page 18 of NRC  
Inspection Report 05000361/2008010 and 05000362/2008010

cc w/Enclosure:  
Chairman, Board of Supervisors  
County of San Diego  
1600 Pacific Highway, Room 335  
San Diego, CA 92101

Gary L. Nolff  
Assistant Director-Resources  
City of Riverside  
3900 Main Street  
Riverside, CA 92522

Mark L. Parsons  
Deputy City Attorney  
City of Riverside  
3900 Main Street  
Riverside, CA 92522

Dr. David Spath, Chief  
Division of Drinking Water and  
Environmental Management  
California Department of Health Services  
850 Marina Parkway, Bldg P, 2nd Floor  
Richmond, CA 94804

Michael J. DeMarco  
San Onofre Liaison  
San Diego Gas & Electric Company  
8315 Century Park Ct. CP21G  
San Diego, CA 92123-1548

Director, Radiological Health Branch  
State Department of Health Services  
P.O. Box 997414 (MS 7610)  
Sacramento, CA 95899-7414

Mayor  
City of San Clemente  
100 Avenida Presidio  
San Clemente, CA 92672

James D. Boyd, Commissioner  
California Energy Commission  
1516 Ninth Street (MS 34)  
Sacramento, CA 95814

Douglas K. Porter, Esq.  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

Albert R. Hochevar  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92675

A. Edward Scherer  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

Mr. Steve Hsu  
Department of Health Services  
Radiologic Health Branch  
MS 7610, P.O. Box 997414  
Sacramento, CA 95899-7414

Mr. Mike Short  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

Chief, Radiological Emergency Preparedness Section  
National Preparedness Directorate  
Technological Hazards Division  
Department of Homeland Security  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052

Electronic distribution by RIV:

Regional Administrator ([Elmo.Collins@nrc.gov](mailto:Elmo.Collins@nrc.gov) )  
Deputy Regional Administrator ([Chuck.Casto@nrc.gov](mailto:Chuck.Casto@nrc.gov))  
DRP Director ([Dwight.Chamberlain@nrc.gov](mailto:Dwight.Chamberlain@nrc.gov))  
DRP Deputy Director ([Anton.Vegel@nrc.gov](mailto:Anton.Vegel@nrc.gov) )  
DRS Director ([Roy.Caniano@nrc.gov](mailto:Roy.Caniano@nrc.gov) )  
DRS Deputy Director ([Troy.Pruett@nrc.gov](mailto:Troy.Pruett@nrc.gov))  
Senior Resident Inspector ([Greg.Warnick@nrc.gov](mailto:Greg.Warnick@nrc.gov))  
Resident Inspector ([John.Reynoso@nrc.gov](mailto:John.Reynoso@nrc.gov) )  
Branch Chief, DRP/D ([Michael.Hay@nrc.gov](mailto:Michael.Hay@nrc.gov))  
Senior Project Engineer, DRP/D ([Don.Allen@nrc.gov](mailto:Don.Allen@nrc.gov) )  
SO Site Secretary ([Heather.Hutchinson@nrc.gov](mailto:Heather.Hutchinson@nrc.gov) )  
Public Affairs Officer ([Victor.Dricks@nrc.gov](mailto:Victor.Dricks@nrc.gov) )  
Team Leader, DRP/TSS ([Chuck.Paulk@nrc.gov](mailto:Chuck.Paulk@nrc.gov) )  
RITS Coordinator ([Marisa.Herrera@nrc.gov](mailto:Marisa.Herrera@nrc.gov) )

Only inspection reports to the following:

DRS STA ([Dale.Powers@nrc.gov](mailto:Dale.Powers@nrc.gov))  
S. Williams, OEDO RIV Coordinator ([Shawn.Williams@nrc.gov](mailto:Shawn.Williams@nrc.gov) )  
ROPreports

SUNSI Review Completed: KDC ADAMS ☒ Yes ☐ No Initials: KDC  
☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

S:/DRS/Reports/SO2008010 errata kdc.

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1/5/2008	1/5/2008	1/6/2008		

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## ENCLOSURE

Analysis: The team determined that the licensee's failure to identify, evaluate, or correct conditions adverse to quality was a performance deficiency that was reasonably within their ability to foresee and prevent. Specifically, in 2007, the licensee failed to recognize, evaluate, or take any action when the performance test for Station Battery 2B008 was terminated early due to test equipment issues. This finding was more than minor because it was associated with the mitigating systems cornerstone (equipment performance attribute) and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using the Inspection Manual Chapter 0609, "Significance Determination Process," Phase 1 Worksheets, the finding is determined to have very low safety significance (Green) because it was not a design issue resulting in loss of function, did not represent an actual loss of a system safety function, did not result in exceeding a TS allowed outage time, and did not affect external event mitigation. This finding was reviewed for cross-cutting aspects and none were identified.

Enforcement: Title 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that conditions adverse to quality are promptly identified and corrected. Contrary to this requirement, as of January 23, 2007, the licensee failed to identify, evaluate, or correct conditions adverse to quality involving a test equipment failure that resulted in the early termination of a required battery performance test. Because this violation is of very low safety significance and has been entered into the licensee's corrective action program as Notification NN 200060319, this violation is being treated as a NCV consistent with Section VI.A.1 of the NRC Enforcement Policy: NCV 05000361/2008010-04, "Inadequate Corrective Actions for Battery Performance Tests Issues."

#### 4. Failure to Follow Procedures During the Battery Performance Tests

Introduction: The team identified a Green NCV of 10 CFR 50, Appendix B, Criterion V, "Instruction, Procedures, and Drawings," for failure to follow procedures while performing the battery performance tests. Specifically, on four occasions, performance tests for the Unit 2 station battery 2B008 were terminated early, instead of continuing the tests until reaching one of the test termination criteria in the applicable test procedure.

Description: SONGS battery performance tests were required to be performed in accordance with Maintenance Procedure SO123-1-2.6. The procedure provided three test termination criteria in step 6.3.8, which included 1) battery overall shut down voltage reached, 2) battery cell temperature exceeding 110°F, or 3) any battery intercell connection showing evidence of excessive heating. The team noted that performance tests performed on the Unit 2 station battery 2B008 in 2002, 2006, 2007, and 2008, were terminated before the minimum battery voltage was reached and without meeting either of the other two termination criteria. The Maintenance Orders for tests performed in 2002 and 2006 stated that they were terminated early because cell #14 approached reversal voltage. The 2007 test was terminated early due to "load bank not maintaining load." The 2008 test was terminated at four hours without further explanation.