



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

January 19, 2011

*(date was on the mailed copy)
- Casey*

Mr. Peter Dietrich
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: REQUEST FOR INFORMATION

REFERENCE ALLEGATION RIV-2010-A-0202

Dear Mr. Dietrich:

The U.S. Nuclear Regulatory Commission (NRC) recently received information concerning activities at the San Onofre Nuclear Generating Station. We request that the Southern California Edison Company evaluate the information described in the enclosure to this letter and submit the results of that evaluation to Region IV Office. If the Southern California Edison Company determines a concern to be substantiated, please discuss the Southern California Edison Company's consideration of appropriate root or apparent causes and generic implications of the substantiated concern and the appropriateness of corrective actions taken or planned. Additionally, if your evaluation identifies any compliance issue with regard to NRC regulatory requirements or NRC commitments, please inform us regarding the requirement or commitment that was violated, the corrective actions taken or planned, and the corrective action documentation that addressed the issue. We ask that you reference our tracking number (RIV-2010-A-0202) in your written response and also that you make any records of your evaluation available for possible NRC inspection.

The NRC will review your response to determine whether: (a) the individual conducting the investigation was independent of the organization with responsibility for the related functional area, (b) the evaluator was proficient in the related functional area, and (c) the evaluation was of sufficient depth and scope. Your response should describe how each of these attributes was satisfied. If individuals were interviewed as part of your review, your response should include the basis for determining that the number and cross section of individuals interviewed was appropriate to obtain the information necessary to fully evaluate the concerns, and the interview questions used. If your evaluation included a sample review of related documentation and/or potentially affected structures, systems, and components, your response should include the

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions
FOIA- ~~_____~~

E/16

basis for determining that the selected sample size was appropriately representative and adequate to obtain the information necessary to fully evaluate the concerns. The NRC will consider these factors in reviewing the adequacy of your evaluation of these issues.

Within 30 days of the date of this letter, submit in writing the results of that evaluation to Mr. Nick Taylor, Senior Allegation Coordinator, at the address listed in the header of this letter. We request that your response include the details of your evaluation and findings related to the validity of the information provided. We request that your response only be sent to Mr. Taylor at the address listed in the header of this letter. No other copies should be sent to the NRC (i.e., your response should not be docketed or otherwise submitted to the NRC Document Control Desk). Any information submitted electronically to the NRC should be provided on a CD or DVD as externally provided thumb drives are prohibited from use on NRC computers. The use of any web-based document room must provide only general support documents to avoid the release of allegation information beyond a "need to know," i.e. procedures, work orders, etc.

We also request that your response contain no personal privacy, proprietary, or safeguards information. If personal privacy or proprietary information is necessary to provide an acceptable response, 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 2.390(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 73.22. Finally, if you choose to utilize a web-based document room to provide any supporting documents, please specify the web location, any specific access requirements, and folder title of where the documents may be retrieved. In the title, please include Mr. Nick Taylor's name and the date of this letter. Do not use the allegation number.

This letter and its enclosure should be controlled and distribution limited to personnel with a "need to know." The response requested by this letter and the accompanying enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. 96-511.

Mr. Peter Dietrich

- 3 -

RIV-2010-A-0202

Lastly, please contact Mr. Neil O'Keefe, Chief, Engineering Branch 2, at 817-860-8137 within 5 days to discuss your evaluation or investigation plan and how it will incorporate the request for information enclosed. Please provide any additional questions you may have at this time concerning this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas H. Taylor", with a stylized flourish at the end.

Nicholas H. Taylor
Senior Allegation Coordinator

Dockets: 50-361; 50-362
Licenses: NPF-10; NPF-15

Enclosure: As stated

~~NOT FOR PUBLIC DISCLOSURE~~

In addition to the response information requested in the cover letter, we ask that your response address or include the following:

Issue 1

The licensee failed to properly evaluate the past operability of four questionable cells from battery 2B007.

Clarification

Old battery bank (2B007) was replaced (by 2/3B00X) in June 2010. The old battery had four "red" cells for over 6 months (copper contamination causes the negative plates to appear red) and those cells may not have been tested to determine past operability of the old battery.

In addition to the response information requested in the cover letter, we ask that your response address or include the following:

Request for Information

1. Provide a copy of Notification (b)(7)(C)
2. Provide a copy of condition report or evaluation concerning possible copper contamination in battery 2B007 in the January 2010 time frame.
3. Provide a copy of any tests that may have been performed to determine the operability of the 2B007 battery bank while in service with contamination.
4. Provide test data for individual cell voltages from the discovery of "red cell" in battery 2B007 until the cells were replaced.
5. Provide results of service test performed on cell NMO8800524124 after it was replaced.

Issue 2

While replacing non-vital charger 3B005 and testing non-vital battery 3B010, Bus 3D5A was de-energized, however, associated power panels 3D5P1, 3D5P2, 3D5P3 and 3D5P4 were energized using a temporary power source. The licensee did not check for grounds on the loads supplied from these panels during the period with this maintenance configuration.

Issue 3

The licensee did not take prompt corrective actions to address Issue 2. Specifically,

RIV-2010-A-0202

- 1 -

Enclosure

~~NOT FOR PUBLIC DISCLOSURE~~

~~NOT FOR PUBLIC DISCLOSURE~~

Notification (b)(7)(C) documented the concern on (b)(7)(C) but no ground detection monitoring was performed until the maintenance was completed.

Request for Information for Issues 2 and 3:

1. Provide a copy of Notification (b)(7)(C)
2. Describe any installed ground monitoring and protection associated with 3D5 dc bus and its associated loads when it is in normal configuration.
3. Describe the grounding protection and monitoring provided for the temporary power to panels 3D5P1, 3D5P2, 3D5P3, 3D5P4.
4. Provide drawings showing configuration for the temporary power and schematic diagram for panels 3D5P1, 3D5P2, 3D5P3, 3D5P4.
5. Provide a schematic diagram for dc power distribution system associated with 3D5 switchgear and associated loads, including ground detector capability.
6. Describe the operating mode of the plant and what important functions were being supported by the panels when the temporary power was implemented.
7. Provide a list of loads being fed by the temporary power.
8. Explain whether a ground fault affecting panels 3D5P1, 3D5P2, 3D5P3, 3D5P4 would affect any of the important functions, including the reserve auxiliary transformers that are associated with loss of off-site power.

Issue 4

Specific gravity measurements may not be compensated for temperature. Specifically, Notification (b)(7)(C) documented that the digital hydrometers used to measure specific gravity in station batteries do not automatically compensate the measurement for temperature, and prompt action was not taken to address this concern.

In addition to the response information requested in the cover letter, we ask that your response address or include the following:

RIV-2010-A-0202

- 2 -

Enclosure

~~NOT FOR PUBLIC DISCLOSURE~~

NOT FOR PUBLIC DISCLOSURE

Request for Information

1. Provide a copy of Notification (b)(7)(C)
2. Provide documentation on the hydrometer used for specific gravity measurement and whether automatic temperature compensation features exists.
3. If the hydrometer being used does not compensate for electrolyte temperature, describe how San Onofre Nuclear Generating Station adjusts for temperature when specific gravity readings were taken on batteries.
4. If the specific gravity was not being compensated for temperature, provide an assessment of whether the surveillance results performed since the temperature compensation stopped, may have caused the batteries to not meet technical specification surveillance criteria or otherwise impacted the operability of the batteries. Please include any data used to draw any conclusions.

Mr. Peter Dietrich

- 4 -

RIV-2010-A-0202

bcc w/enclosure
Allegation File

S:\RAS\ACES\ALLEGATIONS\2010 Case Files\RIV-2010-A-0202\10202 Letter - RFI.doc

ADAMS	No	<input checked="" type="checkbox"/> SUNSI Review Complete	Reviewer Initials: NHT
NEA	SAC	C-EB2	SAC
LMBerger	NHTaylor	NO'Keefe	NHTaylor
/RA/	NHT	<i>CP</i>	NHT
1/6/11	1/7/11	1/11/11	1/11/11

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax