UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

July 23, 2012

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: SAN ONOFRE NUCLEAR GENERATING STATION – NRC PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000361/2012008 AND 05000362/2012008

Dear Mr. Dietrich:

On June 8, 2012, the U.S. Nuclear Regulatory Commission completed a Problem Identification and Resolution biennial inspection at your San Onofre Nuclear Generating Station. The enclosed inspection report documents the inspection results that were discussed with you and other members of your staff.

This inspection was an examination of activities conducted under your license as they relate to problem identification and resolution and compliance with the Commission's rules and regulations and the conditions of your license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of activities, and interviews with personnel.

Based on the inspection sample, the inspection team concluded that the implementation of the corrective action program and overall performance related to identifying, evaluating, and resolving problems at San Onofre Nuclear Generating Station was effective. Licensee identified problems were entered into the corrective action program at a low threshold. Problems were effectively prioritized and evaluated commensurate with the safety significance. Corrective actions were effectively implemented in a timely manner commensurate with their importance to safety and addressed the identified causes of problems. Lessons learned from industry-operating experience were effectively reviewed and applied, when appropriate. Audits and self-assessments were effectively used to identify problems and appropriate actions. Finally, the team verified that the licensee had established a safety-conscious work environment where workers felt free to raise safety concerns without fear of retaliation.

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 Agencywide Document Access and Management 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/

Dr. Dale A. Powers, Acting Chief
Technical Support Branch

Docket Nos.: 05000361, 05000362
License Nos: NPF-10, NPF-15

Enclosure:
1. Inspection Report 05000361/2012008 and 05000362/2012008
   w/ Attachment: Supplemental Information

Electronic Distribution to SONGS

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket:	05000361, 05000362
License:	NPF-10, NPF-15
Report:	05000361/2012008 and 05000362/2012008
Licensee:	Southern California Edison
Facility:	San Onofre Nuclear Generating Station
Location:	4 miles SE of San Clemente, California
Dates:	May 21 through June 8, 2012
Team Leader:	Harry A. Freeman, Senior Reactor Inspector
Inspectors:	Dr. Jonathan D. Braisted, Reactor Inspector Jeff Rotton, Resident Inspector Duane G. Strickland, Operations Engineer David D. You, Project Engineer
Approved By:	Dr. Dale A. Powers, Acting Chief Technical Support Branch Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000361/2012008 and 05000362/2012008; May 21, 2012 – June 8, 2012; San Onofre Nuclear Generating Station "Biennial Baseline Inspection of the Identification and Resolution of Problems."

The team inspection was performed by a senior reactor inspector, a reactor inspector, an operations engineer, a resident inspector, and a project engineer. No findings of significance were identified during this inspection.

Identification and Resolution of Problems

The team reviewed approximately 250 condition reports, work orders, engineering evaluations, root and apparent cause evaluations, and other supporting documentation to determine if problems were being properly identified, characterized, and entered into the corrective action program for evaluation and resolution. The team reviewed a sample of system health reports, self-assessments, trending reports and metrics, and various other documents related to the corrective action program.

On the basis of the activities selected for review, the team concluded that implementation of the problem and identification process and the corrective action program at the San Onofre Nuclear Generating Station was effective. The licensee had a very low threshold for identifying problems and entering them in the corrective action program as evidenced by a high number of nuclear notifications generated (roughly 45,000) per year. Items were screened and prioritized in a timely manner using established criteria and were evaluated commensurate with their safety significance. The team concluded the licensee's overall implementation of actions to correct issues and prevent recurrence of issues was effective. The licensee reviewed operating experience for applicability to station activities. Audits and self-assessments were determined to be performed at an appropriate level to identify deficiencies. On the basis of focus group and individual interviews conducted during the inspection, the team concluded that the safety-conscious work environment had significantly improved since the last biennial inspection and that workers felt free to raise nuclear safety concerns via various methods without fear of retaliation.

The licensee appropriately evaluated industry-operating experience for relevance to the facility and had entered applicable items in the corrective action program. The licensee used industry-operating experience when performing root cause and apparent cause evaluations. The licensee performed effective quality assurance audits and self-assessments, as demonstrated by self identification of poor corrective action program performance and identification of ineffective corrective actions.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations

None

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA2 Problem Identification and Resolution (71152)

The team based the following conclusions on the sample of corrective action documents that were initiated in the assessment period, which ranged from June 18, 2010, to the end of the on-site portion of this inspection on June 8, 2012.

.1 Assessment of the Corrective Action Program Effectiveness

a. Inspection Scope

The team reviewed approximately 250 nuclear notifications including associated root cause, apparent cause, and direct cause evaluations, from approximately 94,000 that had been issued between June 18, 2010, and June 8, 2012, to determine if problems were being properly identified, characterized, and entered into the corrective action program for evaluation and resolution. The team reviewed a sample of system health reports, operability determinations, self-assessments, trending reports and metrics, and various other documents related to the corrective action program. The team evaluated the licensee's efforts in establishing the scope of problems by reviewing selected logs, work requests, self-assessment results, audits, system health reports, action plans, and results from surveillance tests and preventive maintenance tasks. The team reviewed work requests and attended the licensee's daily action review committee pre-screening and the management review committee meetings to assess the reporting threshold, prioritization efforts, and significance determination process, as well as observing the interfaces with the operability assessment and work control processes, when applicable. The team's review included verifying the licensee considered the full extent of cause and extent of condition for problems, as well as how the licensee assessed generic implications and previous occurrences. The team assessed the timeliness and effectiveness of corrective actions, completed or planned, and looked for additional examples of similar problems.

The team also reviewed corrective action documents that addressed past NRC-identified violations to ensure that the corrective action addressed the issues as described in the inspection reports. The inspectors reviewed a sample of corrective actions closed to other corrective action documents to ensure that corrective actions were appropriate and timely.

The team considered risk insights from both the NRC's and San Onofre Nuclear Generating Station risk assessments to focus the sample selection and plant tours on risk significant systems and components. The team selected the following risk significant systems: safety and non-safety related inverters and battery chargers, and emergency core cooling systems pumps.

The samples reviewed by the team focused on, but were not limited to, these systems. The team also expanded their review to include five years of evaluations involving the inverters and battery chargers to determine whether problems were being effectively addressed. The team conducted a walkdown of these systems to assess whether problems were identified and entered into the corrective action program.

b. Assessments

1. Assessment - Effectiveness of Problem Identification

The team concluded that the licensee identified issues and adverse conditions in accordance with the licensee's corrective action program guidance and NRC requirements. The team noted that licensee personnel had a very low threshold for entering issues into nuclear notification system (corrective action program) as evidenced by the more than 94 thousand notifications issued during the two year review cycle. The team did not identify any deficiencies in the area of problem identification for the samples reviewed.

2. Assessment - Effectiveness of Prioritization and Evaluation of Issues

The team concluded that the licensee in general effectively prioritized and evaluated conditions adverse to quality. The team found that even with the high number of notifications initiated on a daily basis, licensee's daily action review committee pre-screening and the management review committees effectively assessed each condition adverse to quality. The team reviewed a number of notifications that involved operability reviews to assess the quality, timeliness, and prioritization of operability assessments. In general, both immediate and prompt operability assessments reviewed were adequately completed in a timely manner.

3. Assessment – Effectiveness of Corrective Action Program

Overall, the team concluded that the licensee had an effective corrective action program where conditions adverse to quality were promptly identified, prioritized, evaluated, and corrected in a timely manner commensurate to safety significance.

The team identified two adverse trends indicative of the program's effectiveness that were resolved by the licensee over the inspection period. The first trend involved a large number of deficiencies identified for failure to adequately control contractors. The licensee initiated process changes in the Fall of 2011 that reduced the number of errors significantly. The second trend involved work hour rule violations. Again, the licensee initiated process changes and significantly reduced the number of violations and eliminated repetition of minimum days off violations.

.2 Assessment of the Use of Operating Experience

a. Inspection Scope

The team examined the licensee's program for reviewing industry-operating experience, including reviewing the governing procedure and self-assessments. A sample size of 14 operating experience notifications that had been issued during the assessment period were reviewed to assess whether the licensee had appropriately evaluated the notifications for relevance to the facility. The team then examined whether the licensee has entered those items into its corrective action program and assigned actions to address the issues. The team reviewed a sample of root cause evaluations and corrective action documents to verify if the licensee had appropriately included industry-operating experience.

b. Assessment

Overall, the team determined that the licensee was adequately evaluating industry-operating experience for relevance to the facility. Corrective action documents considered operating experience in the cause and resolution evaluations. The licensee had entered applicable items in the corrective action program in accordance with station procedures. Both internal and external operating experience was being incorporated into lessons learned for training and pre-job briefs.

.3 Assessment of Self-Assessments and Audits

a. Inspection Scope

The team reviewed a sample of licensee self-assessments, surveillances, and audits to assess whether the licensee was regularly identifying performance trends and effectively addressing them. The team reviewed audit reports to assess the effectiveness of assessments in specific areas. The team evaluated the use of self- and third party assessments, the role of the quality assurance department, and the role of the performance improvement group related to licensee performance. The specific self-assessment documents reviewed are listed in the Attachment.

b. Assessment

The team concluded that the licensee had an effective self-assessment and audit process. Licensee management was involved with developing tactical self-assessments. The team determined self-assessments were self-critical and thorough enough to identify deficiencies.

.4 Assessment of Safety-Conscious Work Environment

a. Inspection Scope

The inspection team conducted six focus group interviews with typically ten individuals per group. The focus groups consisted of workers from the nuclear boiler and condenser, design engineering, health physics, instrumentation and controls, project management, and operations organizations. Individuals were randomly selected by the NRC to assure representative outcomes for the interviews. The inspection team also conducted individual interviews. The interviewees represented various functional organizations and ranged across contractor, staff, and supervisor levels. The team conducted these interviews to assess whether conditions existed that would challenge the establishment of a safety-conscious work environment at San Onofre Nuclear Generating Station.

b. Assessment

The inspection team concluded that the licensee had established a safety-conscious work environment where individuals felt free to raise safety concerns both to the licensee and to the NRC without fear of retaliation. Responses to questions and topics during the focus group sessions did not reveal any sense that safety was not the highest priority. All organizations indicated that the work environment had changed significantly from just over two years ago when the NRC identified a challenged safety-conscious work environment and issued a chilling effects letter. On the basis of focus group and individual interviews conducted during the inspection, the team concluded that the safety-conscious work environment had significantly improved since the last biennial inspection and that workers felt free to raise nuclear safety concerns via various methods without fear of retaliation.

4OA6 Meetings

Exit Meeting Summary

On June 8, 2012, the team presented the inspection results to Mr. Peter Dietrich, Senior Vice President and Chief Nuclear Officer, and other members of the licensee staff. The licensee staff acknowledged the issues presented. The inspectors asked the licensee staff whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

4OA7 Licensee-Identified Violations

None

ATTACHMENT: SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel
P. Dietrich - CNO
D. Bauder - VP, Station Manager
T. McCool - Plant Manager
R. Corbett - Director, Performance Improvement
R. St. Onge - Director, Regulatory Affairs
D. Yarbrough - Director, Operations
J. Madigan - Director, Nuclear Safety Culture
B. Sholler - Director, Maintenance
B. Winn - Director, Finance Management
E. Avella - Director, Project Management Organization
J. Pyles - Director, IT/BI
R. Davis - Director, Nuclear Training
T. Gallaher - Manager, CAP
L. Mosher - Manager, Corporate Communications
K. Johnson - Manager, Design Engineering
O. Thomsen - Manager, Nuclear Fuels
M. Stevens - Nuclear Engineer, Inspections
J. Demlow - Supervisor, Chemistry
R. McWey - Manager, Project Oversight
M. DeMarco - Liaison, SDG&E
A. Martinez - Manager, Self-Assessments
L. Kelly - Manager, Compliance
M. Cuarenta - Technical Specialist, CAP
J. Bashore - Contractor
C. Cates - Manager, Site Recovery
D. Abell - CAPCO Program Owner
C. Hurn - ARC/MRC Program Owner
D. Piper - Technical Specialist, Security
L. Murriel - Manager, Business Administration
M. Pawlaczyk - Technical Specialist, Inspections

NRC personnel
D. Powers – Acting Chief, Technical Support Branch
G. Warnick – Senior Resident Inspector
J. Reynoso – Resident Inspector

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened

None

Opened and Closed

None

Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Procedures

NUMBER	TITLE	REVISION
SO123-IV-3.5	Security Work Hours Management	12
SO123-XV-1.20	Seismic Controls	4
SO123-XV-50	Corrective Action Program	25
SO123-XV-50.CAP-1	Writing Nuclear Notifications for Problem Identification and Resolution	7
SO123-XV-50.CAP-2	SONGS Nuclear Notification Screening	12
SO123-XV-50.CAP-3	Corrective Action Program Evaluations and Action Plans	16
SO123-XV-50.CAP-4	Implementing Corrective Actions	
SO123-XV-50.CAP-5	Corrective Action Effectiveness	
SO123-XV-52	Operability Determinations and Functionality Assessments	24
SO123-XV-52.1	Operability Determination and Oversight	4
SO123-XV-6	SONGS Behavorial Observation Program	19
SO123-XV-6.1	SONGS Fatigue Management	4
SO123-XV-6.2	Work Hour Controls	5
SO123-XX-5	Work Clearance Application / Work Clearance Document / Work Authorization Record (WAR)	43
SO123-XX-6	Operator Work Around Program	
SO123-XXIX-2.16	Nuclear Organization M&CS, Attachment 3, MPR Task Codes	10
SO23-3-3.23	Diesel Generator Monthly and Semi-Annual Testing	59
SO23-ODP-1	Operability Determination Program	1
SO23-XV-4.13	Control of Work and Storage Areas within the Protected Area	12

Documents

Number	Title	Revision/Date
FSAR 8.2.2.1.1	Availability Considerations for SCE System	April 2009
SOB-216	System Operating Bulletin No. 216	April 26, 2006

Evaluations

Number	Title	Revision/Date
ACE 201181704	Operation of the RWST Purification & Recirculation lineup is not supported by SONGS Design Basis	September 30, 2010
ACE 200638791	Letdown Control Valve 3LV0110B Failed to Limit Letdown Flow During Power Reduction Transient	January 26, 2011
ACE 201572878	Submerged Perimeter Paging Cables	August 26, 2011
ACE 201010231	Non-Cited Violation For Less Than Adequate Response To Westinghouse Nuclear Safety Advisory Letter (NSAL) 09-8	
ACE 201393414	Green NCV – Seasonal Readiness Program	April 28, 2011
ACE 201448584	Auxiliary Feedwater Pipe Trench Drainage	June 14, 2011
ACE 201577458	3K006 Speed Swings	September 22, 2011
ACE 201299452	Missed Tech Spec SDM Surveillance	March 9, 2011
ACE 201286253	Investigation of U3C15 Transformer Configuration	March 4, 2011
ACE 200895372	Unplanned Unit 2 Power Reduction to Remove Shells from Condenser Waterboxes	December 30, 2010
DCE 201165132	HPSI 2FT0321-1 Failed to Fill and Vent During Surveillance	January 12, 2011
DCE 201606472	Lack of Acceptance Criteria for Safety Injection Tank Leakage in Operations Procedure	October 3, 2011
DCE 201513478	Feeder Breaker over current trip set at 180 amps – Charging Pump Motors 2(3) P190, 2(3) P191 & 2(3) P192	July 19, 2011
DCE 201287222	10 CFR 50.59 Issue Resolution (DCE)	February 23, 2011
DCE 201205222	Potential Non Compliance with Regulatory Guide 1.75	December 22, 2010
DCE 201638629	Technical Specification LCO 3.8.1, Condition “A” Not Met	October 24, 2011
CCE 201396878	Station Management expressed a concern that the Predictive Maintenance (PdM) Watchlist has more vibration identified items on the list than other stations	

Licensee Event Reports

Number	Title	Revision/Date
LER 3-2011-001	Missed Tech Spec SDM Surveillance	March 26, 2011
LER 2-2011-002	Dual Unit Automatic Trip on High Pressurizer Pressure Due to Grid Disturbance	November 1, 2011

Condition Reports (Nuclear Notifications)

200721702	201328970	201434892	200638791	200950125
200973110	201092448	201122128	200982045	201940544
200987250	201577458	200758654	201373487	201577458
201025656	201799576	200961547	201877320	201878037
201042361	200804979	201835752	200728657	200926776
201047182	201047271	201116874	201057387	201061165
201061263	201063349	201063427	201065812	201077154
201133936	201135761	201443248	201620253	201287222
201135193	201959463	201866244	201448263	201482168
201138580	201126784	201048764	201149023	201163962
201165132	201205222	201097446	201111679	201262583
201181704	201698531	201464957	201285132	201711294
201217134	201988274	201999587	201258909	201287222
201232148	201296462	201212408	201199502	201299452
201239894	201160468	201175804	201185545	201176656
201284984	201284985	201279128	201241361	201072135
201284984	201284995	201284996	201284998	201296030
201317588	201465833	201367899	201355227	201467430
201325253	201279485	201396878	201410862	201338280
201393414	201448584	201016397	201446365	201599886
201442557	200989773	200977799	200974336	201010231
201462415	201498537	201506537	201506773	201506833
201467427	201466804	201477474	201469828	201467456
201480132	201495805	201492854	201487786	201596350
201506967	201510949	201512809	201535312	201572508
201507023	201892141	201892202	201892229	201892260
201513478	201266158	201764816	201728636	201274638
201546570	201550186	200887620	200869281	200887620
201572509	201033114	201033877	201572878	201606472
201593960	201805547	201799576	200871332	201823099
201604492	201651125	201669264	201638629	201562417
201636269	201638778	200954931	200959837	201656251
201640603	201638778	201323150	201405633	201405699
201644782	201591467	201581508	201508799	201412330
201669106	201711298	201711300	201711302	201711345
201679460	201673712	201664813	201656194	201607886

201682420	201552631	201659899	201698503	201747816
201711414	201711416	201676620	201713505	201654799
201818132	201899920	201215659	201234602	201247150
201851396	201997889	201929367	201933207	201933330
201878081	201891422	201891970	201879865	200738558
201892308	201892321	201892917	201893215	201893255
201893320	201894231	201896597	201897284	201897607
201899714	201901194	201901320	201902865	201902866
201903430	201903685	201905286	201905435	201905485
201906004	201908724	201908729	201909974	201912811
201917249	201917788	201922598	201928355	201921217
201933622	201934801	201937233	201937443	201938956
201940692	201942615	201945249	201945264	201946368
201949784	201949913	201980894	201967249	201958287

Information Request
January 26, 2012
Biennial Problem Identification and Resolution Inspection – San Onofre Nuclear Generating Station
Inspection Report 2012008

This inspection will cover the period from June 1, 2010, to March 25, 2012. All requested information should be limited to this period unless otherwise specified. To the extent possible, the requested information should be provided electronically in Adobe PDF or Microsoft Office format. Lists of documents should be provided in Microsoft Excel or a similar sortable format.

A supplemental information request will likely be sent during the week of March 19, 2012.

Please provide the following no later than February 17, 2012:

1. Document Lists
   Note: for these summary lists, please include the document/reference number, the document title or a description of the issue, initiation date, and current status. Please include long text descriptions of the issues.

   a. Summary list of all corrective action documents related to significant conditions adverse to quality that were opened, closed, or evaluated during the period

   b. Summary list of all corrective action documents related to conditions adverse to quality that were opened or closed during the period

   c. Summary lists of all corrective action documents which were upgraded or downgraded in priority/significance during the period

   d. Summary list of all corrective action documents that subsume or "roll up" one or more smaller issues for the period

   e. Summary lists of operator workarounds, engineering review requests and/or operability evaluations, temporary modifications, and control room and safety system deficiencies opened, closed, or evaluated during the period

   f. Summary list of plant safety issues raised or addressed by the Employee Concerns Program (or equivalent)

   g. Summary list of all Apparent Cause Evaluations completed during the period

   h. Summary list of all Root Cause Evaluations planned or in progress but not complete at the end of the period

2. Full Documents, with Attachments

a. Root Cause Evaluations completed during the period

b. Quality assurance audits performed during the period

c. All audits/surveillances performed during the period of the Corrective Action Program, of individual corrective actions, and of cause evaluations

d. Corrective action activity reports, functional area self-assessments, and non-NRC third party assessments completed during the period (do not include INPO assessments)

e. Corrective action documents generated during the period for the following:

i. NCV's and Violations issued to San Onofre

ii. LER's issued by San Onofre

f. Corrective action documents generated for the following, if they were determined to be applicable to San Onofre (for those that were evaluated but determined not to be applicable, provide a summary list):

i. NRC Information Notices, Bulletins, and Generic Letters issued or evaluated during the period

ii. Part 21 reports issued or evaluated during the period

iii. Vendor safety information letters (or equivalent) issued or evaluated during the period

iv. Other external events and/or Operating Experience evaluated for applicability during the period

g. Corrective action documents generated for the following:

i. Emergency planning drills and tabletop exercises performed during the period

ii. Maintenance preventable functional failures which occurred or were evaluated during the period

iii. Adverse trends in equipment, processes, procedures, or programs which were evaluated during the period

iv. Action items generated or addressed by plant safety review committees during the period

3. Logs and Reports

   a. Corrective action performance trending/tracking information generated during the period and broken down by functional organization

   b. Corrective action effectiveness review reports generated during the period

   c. Current system health reports or similar information

   d. Radiation protection event logs during the period

   e. Security event logs and security incidents during the period (sensitive information can be provided by hard copy during first week on site)

   f. Employee Concern Program (or equivalent) logs (sensitive information can be provided by hard copy during first week on site)

   g. List of Training deficiencies, requests for training improvements, and simulator deficiencies for the period

4. Procedures

   a. Corrective action program procedures, to include initiation and evaluation procedures, operability determination procedures, apparent and root cause evaluation/determination procedures, and any other procedures which implement the corrective action program at San Onofre

   b. Quality Assurance program procedures

   c. Employee Concerns Program (or equivalent) procedures

   d. Procedures which implement/maintain a Safety-Conscious Work Environment

5. Other

   a. List of risk significant components and systems

   b. Organization charts for plant staff and long-term/permanent contractors

Note: "Corrective action documents" refers to condition reports, notifications, action requests, cause evaluations, and/or other similar documents, as applicable to San Onofre.

As it becomes available, but no later than February 17, 2012, this information should be uploaded on the Certrec IMS website. When these documents have been compiled (and by February 17, 2012), please download these documents onto a CD or DVD and sent it via overnight carrier to:

Harry Freeman
U.S. NRC Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

Please note that the NRC is not able to accept electronic documents on thumb drives or other similar digital media. However, CDs and DVDs are acceptable.