

*Southern California Edison Company*

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KENNETH P. BASKIN  
VICE PRESIDENT

April 23, 1987

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REGION V I&E

U. S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596-5368

Attention: Mr. J. B. Martin, Regional Administrator

Dear Sir:

Subject: Docket No. 50-361  
Response to Notice of Violation  
Inspection Report No. 50-361/86-25  
San Onofre Nuclear Generating Station, Unit 2

References: (A) Letter, D. F. Kirsch (NRC) to Kenneth P. Baskin (SCE),  
dated December 17, 1986  
(B) Letter, Kenneth P. Baskin (SCE) to J. B. Martin (NRC),  
dated January 15, 1987

Reference (A) transmitted the subject NRC Inspection Report which included a Notice of Violation resulting from the September 22 through October 3, 1986 special team inspection conducted by Mr. R. P. Zimmerman, and other members of your staff. Reference (B) provided SCE's response to the Notice of Violation issued by Reference (A).

In the response contained in Reference (B), it was indicated that "additional non-conformances resulting from containment inspections will be completed during the respective Unit refueling outages (March 1987 Unit 3; late 1987 Unit 2)". This letter is to advise you that certain non-conformances identified during the Unit 3 outage were not corrected prior to returning the Unit to service.

During the recent Unit 3 refueling outage, all Raceways inside containment were visually inspected to determine the extent to which they complied with the separation criteria of Regulatory Guide 1.75. In four instances, documented in Non-Conformance Report 3-1748, compliance with the criteria was deficient. Four type 5 barrier installations (metal enclosures across the top of the tray) were found to be of insufficient length.

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Mr. J. B. Martin

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The disposition of the Non-Conformance Report, however, did not indicate that the conditions noted were to be corrected prior to Unit restart, as committed to in the Reference (B) response. The requisite work to correct these discrepancies during the Unit 3 outage was, therefore, not completed.

The nonconformance regarding insufficient length of the four (4) cable tray metal enclosures does not represent a significant deficiency affecting plant safety; however, SCE recognizes the importance of following through with NRC corrective action commitments. Accordingly, Edison has evaluated the causes of not having corrected the identified discrepancies. Our investigation to date indicates that the cause of this failure to follow through as committed was the ineffective use of existing administrative controls within the NCR process by the organizations responsible for performance of the inspection documentation and verification of the findings.

Additional audits will be undertaken to assure that this has been an isolated occurrence and to determine the need to enhance existing administrative controls which are utilized to track commitments and process NCRs; appropriate revisions shown to be necessary by these audits will be made. Initial corrective action will include providing increased visibility of NRC commitments by establishing a periodic review of such commitments at meetings held regularly during unit outages.

The subject non-conforming conditions, identified in NCR 3-1748, currently are planned to be corrected during the next Unit 3 outage of sufficient duration, but no later than startup following the next Unit 3 refueling outage.

If there are any questions regarding the above, please advise.

Sincerely,

*Kenneth P. Baskin*

cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 & 3)