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 FACIL:50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362

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 MORGAN,H.E. Southern California Edison Co.
 RECIP.NAME RECIPIENT AFFILIATION
 MARTIN,J.B. Region 5, Ofc of the Director

SUBJECT: Provides required 14-day follow-up rept to 881102 rept confirming prompt notification of LC violation.

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Southern California Edison Company

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November 15, 1988

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5369

Attention: John B. Martin, Regional Administrator

Dear Sir:

Subject: Docket Nos. 50-361 and 50-362
License Condition 2.G 14-Day Report
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, H. E. Morgan (SCE) to J. B. Martin (NRC), Subject: "Docket Nos. 50-361 and 50-362, Prompt Report, License Condition 2.C.(14)a and 2.C.(12)a," dated November 2, 1988.

The referenced letter provided the confirmation of a prompt notification made pursuant to License Condition 2.G to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Units 2 and 3, respectively. The notification advised the NRC of a plant condition which constituted a violation of License Condition 2.C.(14)a, Fire Protection for Unit 2, and 2.C.(12)a, Fire Protection for Unit 3. Specifically, it was determined that redundant safe shutdown cables located in fire area 2-YD-30-200 (fire zones 2-YD-30-200A and 2-YD-30-200B) were not separated and/or protected in accordance with 10 CFR 50, Appendix R, Section III.G. This submittal provides the required 14-Day Follow-up report.

License Conditions 2.C.(14)a and 2.C.(12)a require that SCE maintain in effect and fully implement the Fire Protection Plan as delineated in the Updated Fire Hazards Analysis (UFHA). In June 1988, during the preparation of Revision 4 to the UFHA, the presence of redundant safe shutdown cables in the Units 2 and 3 common yard area was identified by offsite engineering personnel. This area had not been considered in previous Appendix R analyses or the UFHA. At the time of this discovery, a Non-Conformance Report (NCR), which is used to document observed deviations from design requirements and which requires evaluation for reportability, was not generated. Additionally, when personnel who are generally aware of the reporting requirements of License Condition 2.G were advised of the observed condition, it was believed that clarification from the Office of Nuclear Reactor Regulation (NRR) was required to determine what additional actions

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would be appropriate to resolve this issue. Subsequent to conversations with NRR it was determined that the appropriate action was to pursue deviation approval through the ongoing resolution of Appendix R issues currently taking place with NRR. Because the NRC had been informally advised of this issue through these discussions with NRR, the reporting requirements of License Condition 2.G were not adequately considered.

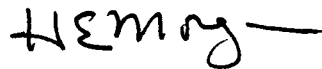
On November 1, 1988, during the preparation of written correspondence to NRR requesting such a deviation, a multi-disciplinary review of the condition was performed. It was determined at that time that a report in accordance with License Condition 2.G was required. Therefore, the reporting of this deviation from the requirements of Appendix R is delinquent.

There is no safety significance associated with this event since an engineering evaluation of the condition (i.e., spatial separation, contour of the ground, lack of contiguous combustible path) has determined that an equivalent level of protection to Section III.G.2 of Appendix R to 10 CFR 50 is provided in this fire area. Accordingly, no corrective actions are planned beyond submittal of the deviation request.

With respect to the failure to document this condition in an NCR, as discussed by letter from Mr. K. P. Baskin (SCE) to J. B. Martin (Region V), dated September 2, 1988, SCE is involved in expanding the use of the NCR process by offsite organizations. Training on this process is currently being administered to appropriate offsite supervisory personnel, and includes guidance necessary to adequately evaluate findings to ensure that NRC reporting requirements are properly considered. Furthermore, appropriate personnel have been informed that it is no longer SCE's policy to address Appendix R issues separately from the requirements of License Condition 2.G.

If you require any additional information, please so advise.

Sincerely,



H. E. MORGAN
STATION MANAGER

MEFreedman:wp

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

NRC Document Control Desk

Institute of Nuclear Power Operations (INPO)