

Southern California Edison Company

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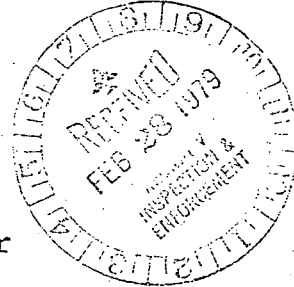
ROSEMEAD, CALIFORNIA 91770

JACK B. MOORE
VICE PRESIDENT

February 22, 1979

TELEPHONE
213-572-2292

Office of Inspection and Enforcement
Region V
U. S. Nuclear Regulatory Commission
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94596



Gentlemen:

Attention: Mr. R. H. Engelken, Director

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station, Units 2 and 3

In a letter from your office dated January 31, 1979 we were requested to respond to a Notice of Violation resulting from the inspection of San Onofre Units 2 and 3 which took place on January 8 - 11, 1979. Our response is provided as an enclosure herewith.

I trust the enclosure responds adequately to all aspects of the Notice of Violation. If you have any questions or if we can provide additional information, please let me know.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'J. B. Moore', written over a horizontal line.

Enclosure

cc: R. J. Pate (NRC, San Onofre 2 and 3)

7903150304

RESPONSE TO NOTICE OF VIOLATION
DATED JANUARY 31, 1979

Response to the Notice of Violation is provided below with a statement of the item for reference.

NOTICE OF VIOLATION

"Appendix B of 10 CFR 50, Criterion XII, states, in part, that, 'Measures shall be established to assure that tools, gauges, instruments and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods....' Appendix A to the PSAR, Page A2-11, Section XII, implements this criterion by requiring controls 'for recalibration of metrology equipment and controls to prohibit the use of equipment determined to be defective, obsolete or out of calibration.' Bechtel Procedure WPP/QCI 010 provides implementing instructions for meeting these requirements. The requirements include the use of a calibration control log, an index card file system for recall for calibration, and maintenance of files relating to issue and recall.

Contrary to the above, as of January 11, 1979, a governing record used as a calibration control listing for 69 items of measuring equipment, controlled and used by the nuclear field engineering group contained numerous discrepancies including:

1. Inconsistent designation of 'out of service' and 'calibrate as needed' - 2 items.
2. Equipment listed as 'in-service,' but not in recall file - 20 items.
3. Equipment shown in file, but not included on master list - 2 items.
4. Equipment removed from calibration recall file to either 'out of service' or 'calibrate as needed' status without an authorizing communication - 49 items.
5. One item with a control designation, but no file record of any type.

This item is a deficiency."

RESPONSE

a. Corrective Actions Which Have Been Taken and Results Achieved

Immediately following the NRC inspection, a review of the calibration records system was initiated. Each of the items identified by the NRC inspector, as well as a large sample of other items included in the calibration recall system, were checked. The check included a review of the records and physical verification of the item and location and status. In no instance was an uncalibrated instrument found to have been used for documented acceptance purposes.

Based on the above review and the results of meetings held on the subject of control of measuring and test equipment, changes to the governing procedures have been issued which clarify instructions and control provisions in this area.

b. Corrective Actions Which Will Be Taken

Training sessions on the revised procedure will be conducted for affected personnel. Audits and surveillance of the measuring and test equipment calibration program will be conducted to assure adequate implementation of procedural requirements.

c. Date When Full Compliance Will Be Achieved

Actions identified in paragraphs a. and b. above will be completed by March 16, 1979.