

Southern California Edison Company

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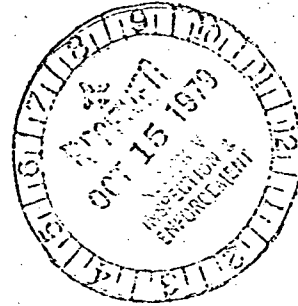
ROSEMEAD, CALIFORNIA 91770

A. ARENAL
VICE PRESIDENT

TELEPHONE
213-572-1476

October 11, 1979

Mr. R. H. Engelken, Director
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



Dear Mr. Engelken:

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

In a letter from your office dated September 7, 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 July 1 through 31, 1979. Our response is enclosed.

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. Arenal

Enclosure

cc: R. J. Pate (NRC-San Onofre 2&3)

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79-135

RESPONSE TO NOTICE OF VIOLATION
DATED SEPTEMBER 7, 1979
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

Response to the Notice of Violation is provided below. A statement of the condition described by the Notice is given for reference.

NOTICE OF VIOLATION

"Appendix B of 10CFR50, Criterion V, states in part that, 'Activities affecting quality shall be prescribed by documented instructions ... and shall be accomplished in accordance with these instructions ...' " Appendix A to the PSAR commits to comply with the requirements of 10CFR50, Appendix B.

Contrary to the above, a craftsman was observed cutting a section of stainless steel pipe for the safety injection system (Spool 52-SI-045-1) on July 19, 1979 with a grinding disc that was not identified as a disc to be used on stainless steel. This is contrary to the construction procedure WPP-QCI-206, Revision 4, which states "Grinding Wheels, disc and wire wheels to be used on stainless steel or nickel base alloys shall be color coded by the tool room attendant or the warehouse personnel with a white metal marker ..."

"This item is a deficiency."

RESPONSE

1. Corrective Actions Which Have Been Taken and Results Achieved

Immediately following the NRC inspection, it was determined that the grinding disc used by the craftsman to cut the section of the subject stainless steel pipe was a new disc, and had not been previously used. Therefore, this work was accepted.

Based on the review of crafts practices and the results of meetings held on the subject of grinding wheel identification, changes to the governing field procedures have been issued which clarify instructions and control provisions in this area.

To strengthen procedural controls and achieve positive identification of all grinding wheels, discs, and wire wheels, WPP/QCI-206 has been revised to provide application of a red color code to all grinding wheels, discs, and wire wheels, and carbon steel hand wire brushes to be used on carbon steel.

A series of meetings on the subject of Marking of Grinding Wheels were held with all Craft Superintendents. In these meetings, personnel were instructed to strictly follow the instructions in WPP/QCI-206 regarding use of wheels, discs, and wire brushes. In addition, training sessions for tool room attendants, warehousemen and craft supervision have been conducted. Personnel have been instructed that wheels, discs, and wire brushes are to be color coded by warehousemen/tool room attendants only, per WPP/QCI-206.

Further, Field personnel have been instructed to return all unmarked grinding wheels to the tool room to be painted red only, or discarded. The returned grinding wheels are not to remain unmarked or be painted any other color.

2. Corrective Actions Which Will Be Taken

Control, issuance and use of grinding wheels, discs, and wire brushes, per the strengthened procedural requirements, will be added to the scope of the existing Quality Assurance Surveillance Program on this subject, to assure that procedural requirements are implemented.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 17, 1979, when it was verified that training classes had been conducted and procedural commitments had been implemented.