

Southern California Edison Company

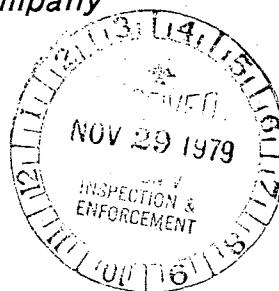
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ROSEMEAD, CALIFORNIA 91770

A. ARENAL
VICE PRESIDENT

November 27, 1979



TELEPHONE
213-572-1476

Mr. R. H. Engelken, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region V
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 October 26, 1979, we were requested to respond to a Notice of Violation resulting from an inspection of San Onofre Units 2 and 3 construction activities which took place during the period August 20-24, 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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RESPONSE TO NOTICE OF VIOLATION
DATED OCTOBER 26, 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

"Based on the results of an NRC inspection conducted on August 20-24, 1979, it appears that one of your activities was not conducted in full compliance with the conditions of your NRC Construction Permit No. CPPR-97/98 as indicated below:

A. 10CFR 50, Appendix B, Criteria V required that "Activities affecting quality...shall be accomplished in accordance with...instructions, procedures, and drawings.:

Bechtel instruction WPP/QCI 009 Appendix II, "Maintaining Cleanliness in Cable Trays" required in part that "cable trays with cable installed, shall not be used for material storage", and "efforts shall be made to prevent sharp and/or large, heavy objects from resting on installed cables." This procedure defines a heavy object as being one which "depresses the outer jacket of a cable."

Contrary to the above requirements, inspection of cable trays with installed class IE cable, carried out by Regional based inspectors on August 20 and August 21, 1979, disclosed cable trays, near an electrician's workstation in the Unit 2 cable riser area, being used as a storage area. Specifically, in cable tray sections 1DBRA3 and 1DBVA3 there were found food items, spray paint cans, a paper bag of sanding disks, a web belt, rags, and a 1/2 gallon can of hand cleaner. Nearby, in cable tray section 1DCWA1 a metal air hose fitting and a wooden handled wire brush were found.

Additionally, it was noted in Unit 3 cable spreading room, that wood covers used to protect installed cable by forming a "top" to cable trays was actually resting on several cables entering the trays. At these points the cable was "pinned" between the wood cover and the cable tray edge, deforming the outer jacket of this cable.

This is an infraction."

RESPONSE1. CORRECTIVE ACTION WHICH HAS BEEN TAKEN AND THE RESULTS ACHIEVED

The material placed in Cable Trays Sections 1DBRA3, 1DBVA3, and 1DCWA1 was removed immediately, and the wood "tops" were placed in such a position as to not "pin" the cable between the wood cover and the cable tray edge.

The cable which had been "pinned" between the wood cover and the cable tray edge was examined and determined to be undamaged.

Bechtel Quality Assurance performed surveillances in the Unit No. 2 and 3 Cable Spreading Rooms and ascertained that the above actions were taken.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

To mitigate the possibility of unacceptable materials from being placed in cable trays, the following signs have been posted in all entrances where a concentration of accessible cable trays exist:

"Keep cable trays clean, placing or storing any object in cable trays shall be cause for disciplinary actions."

Bechtel craft supervision has been instructed on the need to refrain from having personnel place unacceptable material in the cable tray. In addition, Bechtel Field Contracts Administration will reiterate to all site contractors, by letter, the requirement of cable tray cleanliness.

Bechtel Quality Assurance, Quality Control, and Construction Field Engineering will continue to perform inspection/monitoring of cable tray cleanliness in accordance with WPP/QCI-009, Appendix II, "Maintaining Cleanliness in Cable Trays".

3. DATE BY WHICH FULL COMPLIANCE WILL BE ACHIEVED.

Full compliance was achieved on November 16, 1979, when site contractors were notified of cable tray cleanliness requirements.