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 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362  
 AUTH. NAME: AUTHOR AFFILIATION  
 DIETCH, R. Southern California Edison Co.  
 RECIP. NAME: RECIPIENT AFFILIATION  
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director  
 EISENHUT, D. G. Division of Licensing

SUBJECT: Forwards Potential Finding Rept-0034 re seismic design verification. GA Procedure N18-.04 fails to assess effectiveness of GA program as audit objective.

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*Southern California Edison Company*



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ROBERT DIETCH

VICE PRESIDENT

TELEPHONE

213-572-4144

January 26, 1982

Mr. Harold R. Denton  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Mr. Darrell G. Eisenhut

Dear Mr. Denton:

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



Enclosed are seven copies of PFR-0034 issued to Southern California Edison Company which has been dispositioned by General Atomic to be a Finding. According to our procedures, as previously transmitted to you, this Finding is being processed through a CAR.

If you have any questions, please call me.

Very truly yours,

*Robert Dietch*

cc: NRC Region V  
R. H. Engelken (w encl)

*Boo!*  
*S.H.*

8201290289 820126  
PDR ADDCK 05000361  
A PDR



**TORREY PINES TECHNOLOGY**

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Telephone: (714) 455-2654

**GEORGE L. WESSMAN**  
Director

**January 25, 1982**

**Mr. D. J. Fogarty**  
Executive Vice President  
Southern California Edison Company  
P. O. Box 800  
Rosemead, California 91770

**Dear Mr. Fogarty:**

**Enclosed herewith is report 2408-PFR-0034 which has been classified as a Finding.**

**Sincerely,**

*George /j*

**George L. Wessman**  
Project Manager

**Enclosure**

**cc: J. Adrian**

POTENTIAL FINDING REPORT  
SONGS 2&3 SEISMIC DESIGN VERIFICATION

REVISION \_\_\_\_\_

## PREPARATION BY GA INITIATOR

AFFECTED ITEMS: SCE Quality Assurance Procedure N18.04, Rev. 18 (11/23/81) and prior revisions - "QA Organization Audits - Scheduling, Planning, Performance, Documentation and Follow-Up"

## REQUIREMENT REFERENCE DOCUMENTS:

OCFR50, Appendix B - Criterion 18 and Regulatory Guide 1.144 (Rev. 1, 9/80), with endorsed ANSI/ASME N45.2.12-1977.

BASIC REQUIREMENT: Appendix B requires that "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine effectiveness of the program." ANSI/ASME N45.2.12 states: "The objectives of the audit system are: 3.2.3 to assess the effectiveness of the quality assurance program;"

## DESCRIPTION OF POTENTIAL FINDING:

SCE Quality Assurance Procedure N18.04 did not specify assessment of effectiveness of the quality assurance program as an audit objective. Consequently, QA audits concerning seismic design output implementation might confirm compliance with established controls, for example, without determining effectiveness.

PREPARED BY: W. J. Demand DATE: 1/19/92

REJECTION OF GA TASK LEADER COMMENTS BY: \_\_\_\_\_ DATE: \_\_\_\_\_

REJECTION OF ORIGINAL DESIGN ORG. COMMENTS BY: \_\_\_\_\_ DATE: \_\_\_\_\_

## REVIEW BY GA TASK LEADER

## COMMENTS

☒ AGREE PFR IS VALIDBY J. BremerDATE 1/14/92☐ REQUEST RE-REVIEW

BY \_\_\_\_\_

DATE \_\_\_\_\_

☐ DISAGREE

BY \_\_\_\_\_

DATE \_\_\_\_\_

## VIEW BY ORIGINAL DESIGN ORGANIZATION

## COMMENTS

JAP N18.04, Revision 18 (11/23/81), paragraph 5.3.5 requires that audit reports include a summary of audit results (i.e., an evaluation statement regarding the effectiveness of the quality assurance program.) Previous revisions did not include this provision.

AGREE PF IS VALID EXCEPT AS NOTED ABOVE

~~REJECT~~

BY:

*J. M. Cunn*

DATE: 1-21-82

## COMMENDATION BY FINDINGS REVIEW COMMITTEE

FINITION ADEQUACY:

☒ ADEQUATE

☐ INADEQUATE

ALIDITY:

☒ VALID

☐ INVALID

CLASSIFICATION:

☐ OBSERVATION

☒ FINDING

JUSTIFICATION:

\*CLASSIFICATION CRITERION NO. RESULTING IN "FINDING" 2

COMMENT ON "OBSERVATION" CLASSIFICATION

BY:

*S. L. Kouby*

DATE:

1/23/82

SA PROJECT MANAGER

☒ ACCEPT

☐ REJECT

*Sh...*

*1-21-82*

# IMPACT ASSESSMENT

2408PFR NO. -0034

AFFECTED ITEM: SCE Quality Assurance Procedure N18.04

IS THERE THE POTENTIAL FOR REDUCING DESIGN MARGINS TO THE EXTENT DESIGN ALLOWABLES ARE EXCEEDED OR DESIGN REQUIREMENTS ARE NOT MET?

Not applicable

IS THERE THE POTENTIAL THAT THE ITEM MIGHT FAIL OR ENDANGER OTHER ITEMS DURING AN SSE?

Not applicable

COULD THE FAILURE OF THIS ITEM DURING AN SSE CREATE A SUBSTANTIAL SAFETY HAZARD?

Not applicable

COULD THE PROCEDURAL VIOLATION CREATE A SUBSTANTIAL SAFETY HAZARD?

Conceivable. See Item 6, below.

ARE OTHER SIMILAR DEVIATIONS LIKELY TO EXIST?

None were identified in the procedure review.

OTHER COMMENTS: QA audits performed to SCE QA Procedure requirements prior to 11/23 may have verified compliance with documented QA program requirements without assessing the effectiveness of the controls. The established controls may have been deficient or requirements may have been omitted. Conceivably, requirements for proper implementation of seismic design outputs may have been inadequate for effective control.

PREPARED BY: W. J. Leonard DATE: 1/23/82

COMMENTS: Agree with above.

BY: J. Brune DATE: 1/23/82



Southern California Edison Company

SB Com

OK 19

QA ORGANIZATION AUDITS -  
SCHEDULING, PLANNING, PERFORMANCE,  
DOCUMENTATION AND FOLLOW-UP

EFFECTIVE DATE

11/23/81

PAGE

1 19

LEGEND

• Revision  
• Addition

REFERENCE

Rev. 17

QAP

COVERED BY

Quality Assurance - 0090Q -

*J. L. Curran*  
Manager,  
Quality Assurance

NUMBER 118.0

REVISION 18

NUMBER ATTACHED

6

## 1.0 PURPOSE

1.1 To provide the requirements for planning, performance, and documentation of quality assurance program audits by the SCE Quality Assurance Organization.

1.2 To provide for communication of deviations from the quality assurance program requirements discovered as a result of an audit and associated followup corrective action verification.

1.3 This procedure is intended to satisfy Criteria XVI and XVIII of 10CFR50, Appendix B, Regulatory Guide 1.33 and ANSI N45.2.12 with respect to planning, performance, documentation and followup action associated with corrective action.

## 2.0 APPLICABILITY

This procedure applies to SCE Quality Assurance Organization audits of quality assurance related activities in the following organizations:

2.1 SCE internal departments and organizations

2.2 Contractors and sub-tier contractors.

## 3.0 RESPONSIBILITY

3.1 The Manager, Quality Assurance is responsible for assuring that the audit program is supported by sufficient manpower, funding and facilities to implement the program. He is responsible for approving audit schedules submitted by the Project QA Supervisors. He is responsible to communicate audit results to the management of the areas audited and to provide appropriate management involvement in resolution of associated corrective action. He shall provide, as a minimum, an annual audit of the Quality Assurance Organization activities in accordance with the applicable requirements of this procedure.



5.4.2 The audit plan shall be used by the audit team to establish a systematic evaluation of the criteria under audit. Each question or item in the audit plan shall be addressed to a degree consistent with the objective of the audit. The auditor may add to the audit plan during performance of the audit areas which are discovered which appear to raise additional questions or potential quality assurance program deviations.

5.4.3 Objective evidence shall be documented in the Audit Report to address each item of the audit plan. This documentation shall provide sufficient detail, to allow management to evaluate the effectiveness of the quality assurance program implementation. \*

5.4.4 Should areas be discovered during the audit which appear to present deficiencies, the auditor shall bring this to the attention of the audit team leader (as appropriate) and the management representative escorting the auditor. This communication is considered necessary in order to provide a meaningful discussion during the exit interview and to provide a basis for required corrective action recommendations. \*

5.4.5 At the conclusion of the audit, an exit interview or post-audit conference shall be held with the management of the audited organization to present the audit findings. The audit team leader shall provide a summary of the findings addressing the positive points as well as the negative points. Recommended corrective action associated with the negative points should be explored with the management of the audited organization to arrive at a mutually agreed-to solution to the problem prior to concluding the post-audit conference. Results of the post-audit conference as well as any agreements reached shall be documented by the audit team leader in AUDIT COMMENTS (Attachment 2) unless another audit report format is used. AUDIT COMMENTS shall also include a summary of audit results (i.e. an evaluation statement regarding the effectiveness of the quality assurance program elements audited and any recommendations for correcting program deficiencies or improving the quality assurance program). #

## 5.5 Audit Reporting

5.5.1 The Audit Report (Attachment 2) shall be completed in accordance with the instructions provided in Attachment 4. The audit team leader is responsible for finalizing the report.