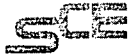


Southern California Edison Company



P. O. BOX 800

2244 WALNUT GROVE AVENUE

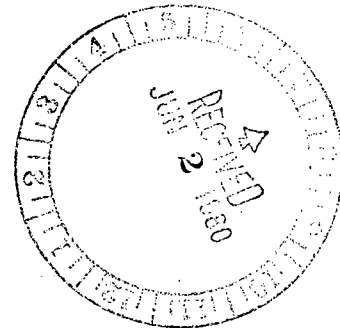
ROSEMEAD, CALIFORNIA 91770

L. T. PAPAY
VICE PRESIDENT

TELEPHONE
213-572-1474

May 28, 1980

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 April 29, 1980 we were requested to respond to a Notice of Violation and a Notice of Deviation resulting from inspections of San Onofre Units 2 and 3 construction activities which took place during the periods March 3-17 and 21-28, 1980. Our responses to these Notices are provided as Attachments I and II.

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

Very truly yours,

Attachments

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

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RESPONSE TO NRC NOTICE OF VIOLATION DATED APRIL 29, 1980

San Onofre Nuclear Generating Station, Unit 2

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

"Based on the results of an NRC inspection conducted on March 3-17 and 21-28, 1980, it appears that one of your activities was not conducted in full compliance with conditions of your NRC Construction Permit No. CPPR-98 as indicated below:

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. The Bechtel Work Plan Procedure/Quality Control Instruction (WPP/QCI) No. 200, Control of Welding Filler Material, Rev. 11.0, Paragraph 6.1.6 states that 'At the completion of the welder's shift, ---, all unused filler material --- shall be returned to the Rod Room attendants;'

Contrary to the above, the NRC inspector found E7018 electrodes that had not been returned to the Rod Room attendant on March 14 and 24, 1980, in the Unit 3 HPSI Pump Room and the Unit 3 containment vessel.

This is an infraction."

RESPONSE1. Corrective Steps Which Have Been Taken and Results Achieved

The welding filler material identified by the NRC inspector was immediately removed and appropriately dispositioned.

In order to provide increased control and accountability of welding filler material, the Bechtel Work Plan Procedure/Quality Control Instructions (WPP/QCI) have been revised as follows:

a. WPP/QCI-200, Appendix VIII has been initiated and provides that:

- (1) Only standard quantities of welding filler material will be issued by the Rod Rooms.

- (2) A documented daily check of each craftsman is conducted during the latter part of the work shift to verify and account for all welding filler material that has been issued to craftsman.
 - (3) A daily check of each craftsman's work area be conducted by the craftsman's foreman to assure that there is no uncontrolled welding filler materials in the area.
 - (4) Daily checks and clean-up be conducted by labor crews.
 - (5) At the end of each shift all used stubs and filler material not intended for re-issue be placed in one-way receptacles at the Rod Rooms and that all unused filler material will be returned to the Rod Room attendant.
- b. WPP/QCI-009 has been revised to include a requirement that Field Engineering and Quality Control personnel will monitor Housekeeping Zones I through V for improperly discarded welding filler material.

Intense Quality Assurance surveillance by both Bechtel and SCE has indicated that the actions described above have been effective in providing accountability and control of welding filler material.

2. Corrective Steps Which Will Be Taken

Quality Assurance surveillance of welding filler material control will continue to ensure corrective action remains effective.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 29, 1980, when all procedural changes and revisions were issued and implemented.

RESPONSE TO NRC NOTICE OF DEVIATION DATED APRIL 29, 1980

San Onofre Nuclear Generating Station, Units 2 and 3

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

"Based on the results of an NRC inspection conducted on March 3-17 and 21-28, 1980, it appears that one of your activities was not conducted in accordance with your commitments in Appendix 3A of the FSAR which states that the 'Quality Program for safety-related items during receiving, storage, and handling of nuclear system components at the jobsite is in accordance with ANSI-N45.2.2-1972 as interpreted by Regulatory Guide 1.38.'

The SCE QA Manual, Chapter 13, Handling, Packaging, Storage, Shipping, Preservation and Cleaning and the Bechtel Project Quality Program Manual, Chapter 13 both reference the requirements of ANSI N45.2.2. ANSI N45.2.2, Section 3.3.4.(3) states in part 'Items subject to detrimental corrosion, either internally or externally shall be suitably protected'. Contrary to the above, high strength bolts were observed on March 5 to be stored in several five-gallon buckets partially filled with rain water.

This is a deviation."

RESPONSE

1. Corrective Steps Which Have Been Taken and Results Achieved

Bechtel has initiated a Nonconformance Report (No. C-2531) to document the condition and appropriately disposition the material. The disposition requires that the subject bolt material shall be inspected to the criteria of a Construction Specification CS-C5 which provides acceptance criteria for corrosion on bolts, studs and other structural material. In addition, a storage shed has been provided at the Jap Mesa storage area. The bolting material has been moved into this structure to eliminate exposure to weather.

RESPONSE TO NRC NOTICE OF DEVIATION DATED APRIL 29, 1980
San Onofre Nuclear Generating Station, Units 2 and 3

ATTACHMENT II
(continued)

2. Corrective Steps Which Will Be Taken

Bechtel Quality Control will include the bolt storage area in the storage surveillance program.

3. Date When Full Compliance Will Be Achieved

Partial compliance was achieved on March 12, 1980 when Bechtel Quality Assurance verified that the subject bolting material had been moved into the storage shed. Full compliance will be achieved on or before August 8, 1980 when all material in question has been inspected and appropriately dispositioned.