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Southern California Edison Company

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September 21, 1992

HAROLD B. RAY
SENIOR VICE PRESIDENT

TELEPHONE
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-361
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Unit 2

Reference: Letter from Mr. S. A. Richards (USNRC) to
Harold B. Ray (SCE), dated August 13, 1992

The referenced letter forwarded a Notice of Violation resulting from the NRC inspection conducted from June 4, 1992 through July 12, 1992, at the San Onofre Nuclear Generating Station, Units 1, 2, and 3. This inspection was documented in NRC Inspection Report Nos. 50-206/92-20, 50-361/92-20, and 50-362/92-20.

In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the Notice of Violation. In addition, you requested an evaluation of the adequacy of the interface between the Station Technical and Operations Departments. You listed two recent events that you considered examples of an interdepartment interface weakness.

We agree with the NRC's observation that these two events are examples of interface difficulties between the Operations and Station Technical Departments, and we have concluded they are primarily due to problems associated with procedural controls and training. In the incident associated with performance of an Inservice Test of the Auxiliary Feedwater Pump, which is the subject of the enclosed NOV response, we have identified as the primary causes: 1) inadequate training of the Station Technical engineer and 2) a weakness in the procedural interface between departments. Regarding the misalignment of the Salt Water Cooling (SWC) pump valve, we believe this was also due to a failure in the procedural interface between these departments. Specifically in each instance, the Operations Division Configuration Control requirements were not clearly implemented in the Station Technical procedures governing these activities.

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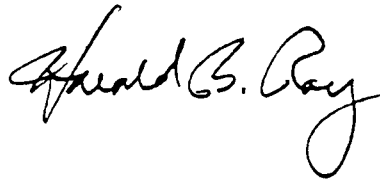
September 21, 1992

Corrective actions have been taken in each of these cases to improve the interface between departments. The appropriate procedures are being reviewed to more effectively implement the Operations Division requirements. In addition, a memorandum has been issued to Operations department personnel emphasizing the requirement for procedural compliance. This memorandum specifically referenced the recent misalignment of a SWC system valve.

To determine whether the two recent events are symptoms of a general problem with effective interface and communications, an evaluation is being performed by the Nuclear Oversight Division. This evaluation is scheduled to be completed by November 15, 1992.

If you have any questions regarding SCE's response to the Notice of Violation or require additional information, please call me.

Sincerely,



Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre
Units 1, 2, & 3

ENCLOSURE

Reply to a Notice of Violation

The enclosure to Mr. Richards' letter dated August 13, 1992 states in part:

"Technical Specification 6.8.1 for San Onofre Nuclear Generating Station, Unit 2, requires that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2. Appendix A of Regulatory Guide 1.33 specifies that safety related activities should be covered by written procedures, including surveillance activities and administrative procedures for procedure adherence.

"Step 3.2 of surveillance procedure SO23-V-3.4.1, "Auxiliary Feedwater Inservice Pump Test Monthly Test", states that the SRO Operations Supervisor must approve running the test. Additionally, step 6.11.1.1 of Operations Division procedure SO123-0-20, "Use of Procedures", states, in part, that a plant manipulation using another division procedure is acceptable if the procedure has been reviewed and approved by a SRO Operations Supervisor prior to performing the work.

"Contrary to the above, on July 1, 1992, surveillance procedure SO23-V-3.4.1 was utilized to perform an auxiliary feedwater surveillance that required SRO Operations Supervisor approval, but the approval of the SRO Operations Supervisor had not been obtained.

"This is a Severity Level V violation applicable to Unit 2 (Supplement I)."

RESPONSE

1. REASON FOR VIOLATION

Our assessment of the violation concluded that: 1) the engineer involved was inadequately trained, 2) the Operations review of the proposed activity was unsatisfactory, and 3) the procedural control for test approval was weak.

Inadequate Training

Station Procedure SO23-V-3.4.1 for the monthly Inservice Test (IST) of Auxiliary Feedwater Pump P140 requires the test engineer to obtain the approval of the "Senior Reactor Operator (SRO) Operations Supervisor" prior to performing the test. Operations Division Procedure SO123-0-20 "Use of Procedures," requires the SRO Operations Supervisor to review and approve the use of other divisions procedures when they direct operator actions.

The Station Technical Engineer obtained the Control Operator's (CO) approval instead of the CRS's approval believing that the CO had the authority of an SRO Operations Supervisor to approve the test. Although the Station Technical Engineer was trained on the technical aspects of the test, he had not received formal training on the administrative requirements associated with the Operations approval of the testing.

Inadequate Operations Review

Prior to being contacted by the Station Technical Engineer, the CO had discussed the IST test with the CRS. The CRS was familiar with the test and considered it acceptable for the test to be run during the shift. However, the CRS erroneously believed that he did not have to perform a review of the Station Technical procedure as required by SO123-0-20, "Use of Procedures."

Procedural Controls

The procedural process that controlled the Station Technical/Operations interface was weak. The IST test procedure directed the Station Technical Engineer to obtain the SRO Operations Supervisor approval prior to performing the test; however, it did not effectively implement the SO123-0-20 requirement that an SRO Operations Supervisor approve performance of the test by providing a place for this approval to be documented (such as a signoff block). As a result, the Control Operator inappropriately granted, and the Station Technical Engineer incorrectly accepted the Control Operator's approval as sufficient authority to

conduct the test. This lack of formal approval documentation by signature appears to be a generic weakness in the IST procedures.

2. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

Corrective actions taken to date included: 1) the counseling of the personnel involved and 2) management direction to Operations staff to more rigorously fulfill procedural requirements.

Counseling of Engineer and Supervision

The Manager of Station Technical reviewed the violation with the Station Technical Engineer, the Lead Engineer involved, and the Group Supervisor.

Management Direction to Operations

The Operations Manager issued a memorandum to all licensed operators conveying management's expectations with respect to rigorous enforcement of the equipment status controls delineated in S0123-0-20. The memorandum reinforces Operations Management's expectation for Operations personnel to follow "Good Operating Practices" identified in Professional Operator Development (POD) training and to perform effective monitoring of evolutions in progress.

3. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Our corrective actions to prevent future occurrences will include: 1) management direction to Station Technical staff to better meet procedural requirements, 2) procedural enhancements, 3) System Engineer Qualification Training, and 4) required reading assignments.

Management Direction to Station Technical

The Manager of Station Technical is presenting training to the Station Technical organization as a whole to discuss the NOV and his expectations for attention to the details of procedural requirements, including the need to resolve procedural uncertainties prior to performing activities. The discussion also includes identification of the Operations positions that perform the function of the SRO Operations Supervisor. This training will be completed by September 30, 1992.

Procedural Enhancements

All Station Technical IST Procedures, including SO23-V-3.4.1, are being revised to include the signoff for the SRO Operations Supervisor as an independent step. The signoff, combined with the training on required approvals discussed below, will eliminate any confusion in the approval process.

In addition, a review will be performed of all appropriate Station Technical procedures to ensure that they are in compliance with all requirements specified in Operations Division Procedure SO123-0-20, "Use of Procedures." Enhancements will be incorporated into the procedures as appropriate.

The IST and other Station Technical procedural enhancements will be completed by the end of 1992.

System Engineer Qualification Training

Earlier this year, in an effort to formalize the System Engineer's responsibilities and management's expectation, SCE prepared a qualification guide for the System Engineer position. The qualification training guide has been validated and is being implemented in training for all Station Technical System Engineers. Beginning the second quarter of 1993, only Station Technical System Engineers who have completed the applicable portions of this training will be allowed to work independently on assignments that impact plant equipment.

This training will ensure Engineers meet minimum qualification guidelines and will formally document the qualification of Engineers to those guidelines. This training includes field performance activities for new Engineers under the guidance of a qualified Engineer. Among other responsibilities, this training will ensure that Station Technical Engineers understand the approval process, including determining who is the acting SRO Operations Supervisor.

Required Reading Assignment

The Station Technical Organization assembled the information from this event and other recent events, such as the SWC valve misalignment, that involve interface with Operations. This will be presented as required reading for the Station Technical Organization and will be completed on September 30, 1992.

4. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

The violation involved a procedural noncompliance which did not affect the operation of the plant. The Auxiliary Feedwater Inservice Pump test was performed successfully and the plant remained in an authorized configuration. Compliance was achieved by reinforcing with members of the Technical and Operations Organizations the need for obtaining appropriate authorizations.