

## Southern California Edison Company

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May 13, 1981

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 94506



Dear Mr. Engelken:

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

In a letter from your office dated April 27, 1981 you forwarded two enforcement Notices resulting from inspections of San Onofre Units 2 and 3 construction activities which took place during the period February 14 to March 12, 1981. The conditions described by the Notices involved: (a) inadequate protection of electrical cables to prevent physical damage and, (b) inadequate housekeeping as evidenced by observation of a Startup Engineer smoking in an area designated as non-smoking.

Attachments 1 and 2 to this letter describe the actions taken to correct and prevent recurrence of these conditions. I trust these attachments respond adequately to all aspects of the Notices. If you have any questions or if we can provide additional information, please let me know.

Very truly yours,

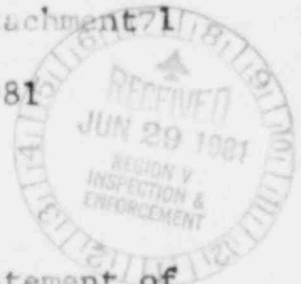
A handwritten signature in cursive script, appearing to read "M. J. Pate".

Attachments

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

RESPONSE TO NRC NOTICE OF VIOLATION DATED APRIL 27, 1981

San Onofre Nuclear Generating Station, Unit 2



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

NOTICE OF VIOLATION

Southern California Edison Co.

Docket No. 50-361

As a result of an NRC inspection on February 14, to March 12, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

Appendix B of 10CFR 50, Criterion V, states, in part, that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings,...and shall be accomplished in accordance with these instructions, procedures, or drawings".

Bechtel construction procedure WPP/QCI 008, states that electrical cable will be stored in accordance with ANSI N45.2.2, paragraph 2.7. ANSI N45.2.2, paragraph 2.7.4 states in part, "Items classified to level D (this includes electrical cables)...require protection against...physical damage".

Contrary to the above, cables 3ARLO3206 and 3ARLO3207 were observed lying on the control room floor and being walked on by persons working in that area on February 11, 1981 and February 18, 1981. On February 17, 1981, these same cables were observed coiled and attached to scaffolding in the control room in a manner which violated the minimum bend radius of 11 inches.

This is a Severity Level VI violation (Supplement).

1. Corrective Steps Which Have Been Taken and Results Achieved

The conditions described by the notice were identified on Nonconformance Reports and were investigated by Bechtel Quality Control personnel. Cables 3ARLO3206 and 3ARLO3207 were visually inspected and Hi-pot tested and the results were found to be within acceptance limits.

The following actions were taken to assure proper protection of cables during construction activities:

- o Cable pulling general foremen and craft personnel were trained on the requirement for cable handling.
- o Units 2 and 3 were walked down by craft personnel to provide protection of cables not adequately protected.
- o Direction was provided to cognizant personnel from Bechtel Field Engineering and Construction Management to protect cabling from hazards during installation activities.

2. Corrective Steps Which Will Be Taken

- o Weekly documented housekeeping surveillances by Quality Control personnel will provide special monitoring for proper protection of cables.
- o Effective implementation of the above requirements will be verified through surveillance activities by Bechtel Quality Assurance personnel.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved by May 12, 1981. By this date cognizant personnel had been re-instructed, walkdown had been completed, and adequate protection for cable in storage was achieved.

RESPONSE TO NRC NOTICE OF DEVIATION DATED APRIL 27, 1981

San Onofre Nuclear Generating Station, Unit 2

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

NOTICE OF DEVIATION

Southern California Edison Company

Docket No. 50-361

Based on the results of an NRC inspection conducted on February 14, to March 12, 1981, 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 Assurance Program for safety-related items regarding housekeeping requirements for the control of work activities, conditions, and environments at the plant are in accordance with ANSI N45.2.3.1973, as interpreted by Regulatory Guide 1.39."

ANSI N45.2.3.1973, paragraph 3.1, states that areas for specific activities, shall be assigned and regulated. In paragraph 2.1, Zone IV is defined as a no-smoking area.

Contrary to the above, on February 22, 1981, the NRC inspector observed a Startup Test Engineer smoking in the Diesel Generator Building which is a Zone IV (No-Smoking) area. Also, there were several extinguished cigarettes on the floor.

This is a deviation.

RESPONSE

1. Corrective Steps Which Have Been Taken and Results Achieved

The condition described in the Notice of Deviation was identified in Corrective Action Request S023-F-1024 dated February 27, 1981. As immediate remedial action the Project Startup Engineering Supervisor counseled the involved Startup Engineer relative to the requirements of WPP/QCI-009 for Housekeeping and in the observance of all posted signs. As a more generic corrective action to prevent recurrence, copies of WPP/QCI-009, Rev. 8, Section 4.7 have been distributed to SCE Startup Supervision with a cover letter requiring that they review this condition with personnel under their direct supervision. Review by Startup personnel has been documented by individual signatures on information acknowledgment sheets.

2. Corrective Steps Which Will Be Taken

No further Corrective Steps are required. Quality Assurance will perform Surveillance to verify effectiveness of corrective steps taken.

3. Date When Steps to Correct the Deviation Will Be Completed

Corrective Steps were completed on April 6, 1981 when Startup personnel completed review of housekeeping requirements.