

Southern California Edison Company

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July 12, 1983

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U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. J. B. Martin, Regional Administrator

Dear Sir:

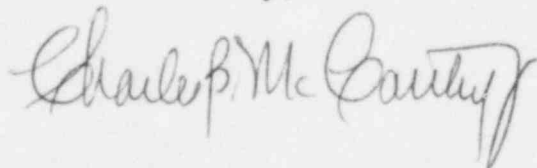
Subject: Docket Nos. 50-361 and 50-362
IE Inspection Reports 50-361/83-15 and 50-362/83-13
Response to Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

Mr. T. W. Bishop's letter of June 17, 1983, issued IE Inspection Report 50-361/83-15 and 50-362/83-13 and forwarded a Notice of Violation resulting from the March 23 through April 29, May 17, and June 1 and 2, 1983, routine inspection conducted by Messrs. A. E. Chaffee, J. P. Stewart, and D. F. Kirsch. The enclosure to this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Bishop's letter of June 17, 1983.

Mr. Bishop also requested we address any actions taken or planned to: (1) assure that the valve and system lineup procedures, filed in the Control Room, adequately reflect installed plant conditions, correct position requirements, and provide adequate definition of component location and labels; and (2) assure that operators properly implement the requirements of valve and system lineup procedures and promptly effect corrective actions to resolve procedure discrepancies observed during the conduct of valve and system lineups. Our response to items A1 and A2, respectively, have been expanded to address these concerns.

If you require additional information, please so advise.

Sincerely,



Enclosure

cc: A. E. Chaffee (USNRC Resident Inspector, Units 2 and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)

Charles B. McCarthy
Vice President, Advanced Engineering

ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. T. W. Bishop's letter of June 17, 1983.

ITEM A1

Appendix A to Mr. Bishop's letter states:

"10 CFR 50, Appendix B, Criterion V, states that 'Activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished.'

"Chapter 5-A of Southern California Edison Topical Report, SCE-1-A, implementing the above requirement, states, in paragraph 10.0, that 'Each procedure shall be sufficiently detailed for a qualified individual to perform the required function without direct supervision, but need not provide a complete description of the system or plant process. Procedures shall include, as appropriate, the following elements: ...(9) Checkoff lists. Complex procedures shall have checkoff lists. These lists may be included as part of the procedure or may be appended to the procedure.'

"Technical Specification paragraph 6.8.1 states that 'Written procedures shall be established, implemented and maintained covering...

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, ...

f. Fire Protection Program Implementation.'

"Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, paragraph 3, states, in part, that '...Instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation should be prepared, as appropriate, for the following systems: ...e. Component Cooling Water System ...1. Auxiliary Feedwater System.'

"1. Contrary to the above requirements, the following procedures were inadequate in that insufficient details or incorrect information existed, such that a qualified individual would be unable to perform the required function without direct supervision.

"(a) Operating Procedure S023-2-4, Revision 6 (Auxiliary Feedwater System Operation) was inadequate in that Checkoff List 2, steps 2.1.20, 2.1.22, 2.1.23, 2.1.25, and 2.1.26, lacked specificity and/or provided incorrect information.

ITEM A1 (Continued)

- "(1) Steps 2.1.20 and 2.1.23 identically describe as line items 'Breaker/Switch Number CBI' and as 'DC Feeder.' These descriptions are not sufficient to allow an operator to positively identify the specific breaker/switch to be operated, the breaker/switch location, or position to be verified in the performance of this procedure. On June 1, 1983, the switches were found to be located in electrical panels MS4705 and MS4706, respectively, however, the breakers did not have any identification label attached identifying the breaker as CBI.
- "(2) Steps 2.1.22 and 2.1.25 are essentially identical, describing the Breaker/Switch number as 'CB3' for valve 'HV-4715.' On June 1, 1983, the switches were found to be located in electrical panels MS4705 and MS4706, respectively, however, the breakers in question were not labeled as CB3, as identified in the procedure, but were instead labeled as 'HV4715' and 'HV-4730' as contained in the procedure description. Operators performing the Unit 2 electrical lineup check indicated in the Comments section, on April 19, 1983, that they believed the Breaker/Switch that was intended to be identified in step 2.1.22 was the Breaker/Switch for Valve HV-4730 instead of HV-4715. The Breaker/Switch for Valve HV-4730 was not contained in Checkoff List 2 nor was a position required to be verified contained in the checkoff list for this Breaker/Switch.
- "(3) In step 2.1.26, the components to be verified are described as 'DC Disconnect Switches' with the Breaker/Switch number listed as 'NA' (NOT APPLICABLE). The number of DC disconnect switches and the location of the switches could not be determined from the procedure. The operators performing the Unit 2 electrical lineup check, on April 19, 1983, indicated in the Comments section that the 'Assumed location of the DC Disconnect Switches was cabinet 2MS4816.'
- "(b) The Unit 2 Operating License No. NPF-10, paragraph 2.C(14), and the Unit 3 Operating License No. NPF-15, paragraph 2.C(12) require full implementation of all provisions of the approved Fire Hazard Analysis.
- "The Fire Hazard Analysis requires, on page III-36 of Table III-1, that, when electrical supervision of fire protection valves is not practicable, an adequate management supervision program should be provided to include locking valves open. The licensee's statement of compliance, on the same page, indicates that Post Indicator Valves and header isolation valves for Seismic Category 1 standpipes are normally locked open.

ITEM A1 (Continued)

(b) (Continued)

"The Safety Evaluation Report attached to the Unit 3 Operating License No. NPF-15, page 9, accepts the Southern California Edison Company's position that header isolation valves for seismic standpipes and locked open manual isolation valves to deluge systems are not electrically supervised.

"Contrary to the above requirements, as of April 14, 1983, Operating Procedure S023-7-1, Revision 7 (Fire Suppression Water System Operation), including Temporary Change Notice No. 1, was inadequate in that certain valves of Checkoff List 1, listed below, were merely required to be open and not locked open with the exception of SA2301MU209, which was required to be closed and capped.

<u>"PROCELURE STEP</u>	<u>VALVE NUMBER</u>	<u>DESCRIPTION</u>
60	SA2301MU041	Manual isolation valve inside Unit 2 Containment
82	SA2301MU202	Manual isolation valve in Penetration Building just outside Unit 2 Containment
106	SA2301MU209	Manual isolation valve in Control Building north header
115	SA2301MU211	Manual isolation valve in Control Building middle header
118	SA2301MU212	Manual isolation valve in Control Building south header
250	SA2301MU219	Manual isolation valve in Unit 3 Containment supply header
275	SA2301MU044	Manual isolation valve inside Containment in Unit 3 Containment supply header
321	SA2301MU217	Manual isolation valve in Radwaste Building north header
326	SA2301MU216	Manual isolation valve in Radwaste Building south header

ITEM A1 (Continued)

"Furthermore, the Piping and Instrumentation Drawings failed to implement the locked open requirements for the following valves:

<u>VALVE NUMBER</u>	<u>DRAWING NUMBER</u>	<u>DRAWING REQUIRED POSITION</u>
SA2301MU041	40184	OPEN
SA2301MU202	40184	OPEN
SA2301MU044	40189S03 & 40189	OPEN

"This is a Severity Level IV Violation (Supplement 1) applicable to Units 2 and 3."

RESPONSE

With respect to Item A1.1.(a) above, Southern California Edison (SCE) believes that the procedures were adequate in that sufficient details existed such that a qualified individual would be able to perform the required function without direct supervision. However, action to be taken with respect to these procedures will include additional details, as described below, and our ongoing procedure review and revision program will include additional details in other procedures, as deemed necessary. The bases for this conclusion are set forth as follows for procedure S023-2-4, Revision 6:

1. The procedure has been used successfully a number of times previously with only normal supervision. No switch misalignments have been identified and only normal inquiry by less experienced personnel concerning component location has occurred.
2. The examples cited concerning Checkoff List 2 relate to items in the Auxiliary Feedwater (AFW) Building. The check list is logically arranged to promote efficient use by listing items in the following order: (1) Control Building (9 foot elevation) - Items 1-3 of check list; (2) Control Building (50 foot elevation) - Items 4-19; and (3) AFW Building - Items 20-27. The items in the AFW Building were not specifically labeled and locations within the building were given for only three of the nine switches. However, a qualified operator with normal supervision has successfully completed the list on several occasions because the lineup is simple and straightforward. There are only six electrical distribution panels in the AFW Building - one 480VAC MCC, one lighting panel, three DC distribution panels and the turbine governor panel. All switches in the AFW Building portion of the check list are inside these latter four panels. These switches constitute all the switches within these four panels. The required position of all switches in the AFW Building with the exception of Item 27 is "CLOSED." Item 27 is required to be in "NORMAL." That switch and position were clearly labeled.

ITEM A1 (Continued)

A qualified operator who was uncertain of the location of any of the items in the AFW Building portion of the checkoff list could consult the Electrical Schedule for the elementary diagram for the valve of interest and quickly determine the electrical panel in which it is contained. This method of referencing is an expected level of knowledge for a qualified operator. Control Room personnel could also be requested to perform the effort and relay the information to the operator completing the check list. Again, this is a normal level of supervision and direction of operators by Control Room personnel.

For Items 20 and 23 of the check list, the "DC Feeder" breakers, the identity of these breakers was considered adequate. The breakers are located in MS4705 and MS4706. There are only three switches (CB1, CB2 and CB3) located in each of the panels and the arrangement of one of the switches interposed between the DC power bus and the other two switches makes it clear which breaker feeds power to the other two and all three are required to be closed. This position is clearly engraved in the breaker casing. Similarly, the DC disconnect switches are both located in MS4716 and are the only switches in that panel. They are "knife" switches making differentiation between closed and disconnect position obvious. The ninth and final switch in the AFW Building portion of the check list is the Turbine Control Panel (L-298) test switch. It is the only switch within that cabinet and was clearly labeled. The check list did, however, contain a typographical error in that valve HV4715 was listed twice vice listing the HV4730 control switch in MS4705.

3. Finally, improper alignment of the "DC Feeder" breakers would result in loss of all valve position indication lights on the main control board for the two valves involved in each panel (MS4705 or MS4706). Improper alignment of either valve's DC supply breaker in MS4705 or MS4706 would result in loss of valve position indication for the valve associated with that particular breaker (HV4705, HV4706, HV4715 or HV4730). Similarly, the incorrect positioning of the "DC Disconnect" switch to HV4716 would result in a loss of its position indication on the main control board. Misalignment of these switches would then be apparent in the Control Room, since control boards are monitored continuously during the shift and are specifically "walked down" as a part of shift turnover.

Corrective Steps Which Have Been Taken and the Results Achieved

With respect to Item A1.1(a), the typographical error in the check list (HV4715 twice vice listing HV4730) has been corrected and the checkoff list has been expanded to indicate the switch location and functions and to couple the switch letter designations in MS4705 and MS4706 to the checkoff list CB1, CB2 and CB3 nomenclature. All switches in MS4705, MS4706 and MS4716 have been identified with engraved valve designations and names. We believe these changes improve the procedure. This activity was completed on May 26, 1983.

ITEM A1 (Continued)

With respect to Item A1.1(b), Operating Instruction S023-7-1, Revision 7, was modified by Temporary Change Notice (TCN) 3 on April 18, 1983, to reflect the correct position of the nine valves identified. P&ID 40184S03 (Valves SA2301MU041 and SA2301MU202) and P&ID's 40189S03 and 40189 (Valve SA2301MU044), were revised on June 23, 1983, to reflect the locked open requirement of the referenced valves. P&ID 40184 (Valves SA2301MU041 and SA2301MU202), was revised on June 29, 1983, to reflect the locked open requirement of the referenced valves.

Corrective Steps Which Will Be Taken To Avoid Further Items of Noncompliance

To assure that the valve and system lineup procedures, filed in the Control Room, adequately reflect installed plant conditions, correct position requirements, and provide adequate definition of component location and labels, an engineering consultant is in the process of validating the adequacy of operating instruction check list completeness and accuracy as measured against the P&ID. This task will be completed by October 31, 1983.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 29, 1983, with revision of P&ID 40184 to reflect the locked open requirements of valves SA2301MU041 and SA2301MU202.

ITEM A2

Appendix A to Mr Bishop's letter states:

"10 CFR 50, Appendix B, Criterion V, states that 'Activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished.'

"Chapter 5-A of Southern California Edison Topical Report, SCE-1-A, implementing the above requirement, states, in paragraph 10.0, that 'Each procedure shall be sufficiently detailed for a qualified individual to perform the required function without direct supervision, but need not provide a complete description of the system or plant process. Procedures shall include, as appropriate, the following elements: ...(9) Checkoff lists. Complex procedures shall have checkoff lists. These lists may be included as part of the procedure or may be appended to the procedure.'

"Technical Specification paragraph 6.8.1 states that 'Written procedures shall be established, implemented and maintained covering...

- a. The applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Revision 2, February 1978, ...
- f. Fire Protection Program Implementation.'

ITEM A2 (Continued)

"Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, paragraph 3, states, in part, that '... Instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation should be prepared, as appropriate, for the following systems: ...e. Component Cooling Water System ...1. Auxiliary Feedwater System.'

"2. Contrary to the above requirements, it was identified that the licensee did not accomplish activities affecting quality, as described below, in accordance with procedure requirements.

"(a) Approximately twenty drain and vent caps were not installed on the Unit 2 Component Cooling Water System contrary to the requirements of Procedure S023-2-17, Revision 2, Checkoff List 1 (Component Cooling Water System Initial Valve Lineup) completed on April 15, 1982. The two operators performing the valve lineup identified that several of the caps were not installed, however, neither the operators nor the Senior Reactor Operator, approving the completed procedure on April 16, 1982, took any action to have the caps installed as required or to revise the procedure to correctly reflect the as-found condition.

"(b) Approximately thirty (30) procedural Unit 3 system lineup steps of Procedure S023-2-17, Revision 3, Checkoff List 1, were checked (initialized) by only one operator instead of two operators and approximately thirty-five (35) other steps were not completed by any operators on November 23 and 24, 1982. This is contrary to the requirements of Procedure S023-2-17, Revision 3, Checkoff List 1. As of April 22, 1983, the completed procedure had not yet been reviewed by the Operations supervisor. The failure to properly execute dual verification requirements is an apparent repeat violation (see Notice of Violation dated March 24, 1983).

"This improperly executed Checkoff List 1 was used as the basis for Unit 3 entry into Operating Mode 4 on January 5, February 26, and March 4, 1983 pursuant to Operating Instruction S023-5-1.3, Revision 6 (Plant Startup from Cold Shutdown to Hot Standby), step 6.15.2 and Pre-Heatup Checkoff List, Section 1, step 2.2.6.

"This is a Severity Level IV Violation (Supplement 1) applicable to Units 2 and 3."

ITEM A2 (Continued)

RESPONSE

Corrective Steps Which Have Been Taken And The Results Achieved

Operators and operations supervisors have been given written directions via Special Orders 83-27, issued April 27, 1983, and 83-30, issued May 23, 1983, as to the discharging of their responsibilities, with respect to the equal requirement for vent/drain caps or flanges to be installed as well as the valve itself being properly positioned when conducting valve lineups. S023-2-17 Checkoff List 1 has been validated and performed again. This action was completed on June 6, 1983, for Unit 2 and June 3, 1983, for Unit 3.

Checkoff List 1 of S023-2-17 dated November 23, 1982, was an incomplete document which was inadvertently placed in the system alignment file for Unit 3. Component cooling water was aligned for acceptance testing using the P&ID's without use of Checkoff List 1 prior to establishing equipment control over the system at system turnover. Equipment control was established on October 2, 1982, and the system remained in service through the mode changes occurring January 5, February 26 and March 4, 1983. Checkoff List 1 is intended to be used to re-establish equipment control after major outage work. As equipment control had been established on component cooling water prior to system turnover and fuel load, and was maintained since that time, no official use of Checkoff List 1 had been completed on the system until June 3, 1983. Operations supervisors erroneously referenced the incomplete document in S023-5-1.3 as it was the only version in the system alignment file. Special Order 83-030 provides specific direction to the operations supervisor with respect to incomplete checkoff lists.

Corrective Steps Which Will Be Taken To Avoid Further Items Of Noncompliance

To assure that operators properly implement the requirements of valve and system lineup procedures and promptly effect corrective actions to resolve procedure discrepancies observed during the conduct of valve and system lineups, modifications to Procedure S023-0-15, "Administrative Control of Valve Operation," are being developed and Special Orders 83-027 and 83-030 have been issued to provide comprehensive guidance for all acceptable methods of determining valve position, conducting second verifications of valve position, and condition and status of locking devices. Training for all operators will be conducted as part of the pre-shift briefing process as soon as the procedure modifications are complete. This will be completed by July 15, 1983.

Additionally, to assure that complete alignments are promptly and correctly confirmed for all systems required by Attachment 3, "Systems Alignment File" of Procedure S023-0-28, "Operating Records," the checkoff lists for all fifty-five listed operations instructions will be validated and corrected as necessary and then reperformed completely by a Special Operations Task Force under the direction of an experienced shift supervisor. Although only eleven of the fifty-five instructions concern safety related systems, all fifty-five will be

ITEM A2 (Continued)

completed under the guidance of Special Orders 83-27 and 83-30. As of June 29, 1983, all Unit 3 System Alignment File instructions have been completed. All but five of the Unit 2 instructions have been completed, the remaining five instructions will be completed prior to Mode 2 entry.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved prior to Unit 2 entering Mode 2 with the completion of the five remaining Unit 2 instructions.

ITEM B

Appendix A to Mr. Bishop's letter states:

"Unit 2 Operating License No. NPF-10, paragraph 2.C(14) states, in part:

"a. SCE shall maintain in effect and fully implement all provisions of the approved Fire Protection Plan as amended through Amendment 10 and the NRC staff's Fire Protection Review described in the SER and Supplements 4 and 5 to the SER."

"The San Onofre Nuclear Generating Station Fire Hazard Analysis, which is the approved Fire Protection Plan, states, on page III-36 of Table III-1, (Comparison of San Onofre Units 2 and 3 with Requirements of Appendix A of the NRC Branch Technical Paper 9.5-1) that the licensee complies with the following:

'All valves in the fire water systems should be electrically supervised. The electrical supervision signal should indicate in the control room and other appropriate command locations in the plant. When electrical supervision of fire protection valves is not

practicable, an adequate management supervision program should be provided. Such a program should include locking valves open with strict key control; tamper proof seals; and periodic, visual check of all valves.'

"The licensee provided the following commitment of compliance with the above requirement with the statement, on the same page, that 'All valves in the fire water system are electrically supervised with the exception of the hose valves which are normally closed and the post indicator valves (PIV) and header isolation valves for Seismic Category I standpipes in the radwaste and control buildings that are normally locked open. The hose valves are not electrically supervised since their opening will result in the starting of the fire pumps due to system pressure drop and will also provide an indication in the control room. The electrical supervision signal provides an indication in the control room and that signal is retransmitted to the computer room (digital events recorder).'

ITEM B (Continued)

"Contrary to the above requirements, on April 14, 1983, while Unit 2 was in Mode 5, valves SA2301MU041 (inside Unit 2 Containment), SA2301MU202, and SA2301MU213 (both inside the Unit 2 Penetration Building) were found to be open, but not locked open, and did not have electrical supervision as stated above. These three valves are in series and the closure of any one of these valves would isolate all fire protection water to the Unit 2 containment. This portion of the Fire Protection Water System was required to be operable during this period by Technical Specification 3.7.8.3.

"This is a Severity Level IV Violation (Supplement 1) applicable to Unit 2.

RESPONSE

Corrective Steps Which Have Been Taken And The Results Achieved

On April 15, 1983, valves SA2301MU041, SA2301MU202 and SA2301MU213 on the Fire Suppression Water System on Unit 2 were locked open. Procedure SO23-3-3.36, "Fire Suppression System Monthly Tests," was revised on April 15, 1983, to reflect the requirement to verify on a monthly basis that these three valves are locked open. On April 18, 1983, the procedure was revised again to include additional valves required to be locked open.

A physical walkdown was conducted to confirm proper installation of all Fire Suppression valves as shown on the P&ID's. There were no other discrepancies regarding valves required to be electrically supervised or locked open identified as a result of these walkdowns. The discrepancies corrected by the April 15 and 18, 1983, revisions have been reflected on the P&ID's.

Corrective Steps Which Will Be Taken To Avoid Further Items Of Noncompliance

No other corrective action is required in this matter beyond that discussed under Items A1 and B, above.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 15, 1983, when valves SA2301MU041, SA2301MU202 and SA2301MU213 were locked open.

ITEM C

Appendix A to Mr. Bishop's letter states:

"10 CFR 50, Appendix B, Criterion 17 (Quality Assurance Records) states that 'Sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: Operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses. The

ITEM C (Continued)

records shall also include closely-related data such as qualifications of personnel, procedures, and equipment. Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted. Records shall be identifiable and retrievable. Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention, such as duration, location, and assigned responsibility.

"Unit 2 Operating License No. NPF-10, paragraph 2C(19)e, states that:

'Procedures for Verifying Correct Performance of Operating Activities (I.C.6, SSER#1)

'Prior to fuel loading, SCE shall implement a system for verifying the correct performance of operating activities, and shall keep the system in effect thereafter.'

"The Safety Evaluation Report, Supplement 1, (I.C.6), (SSER #1) states:

'For the return-to-service of equipment important to safety, a second qualified operator should verify proper systems alignment unless functional testing can be performed without compromising plant safety, and can prove that all equipment, valves, and switches involved in the activity are correctly aligned.'

"Procedure S023-0-17, Revision 8 (Locking of Critical Valves and Breakers), states:

'6.2.1 Control of Locked Valves and Breakers Following Maintenance

Following major outages, major maintenance or major modification of components in safety-related systems; system valve and breaker alignments shall be completed to assure correct valve and breaker positions in the affected system. The procedure which aligns the valves and breakers to their correct position is referenced on Attachment 2 for valves and Attachment 4 for breakers.'

"The Fire Protection System Procedure, S023-0-17, Attachment 2, references Procedure S023-7-1. S023-7-1, Revision 7 (Fire Suppression Water System Operation) states, in paragraph 6.1.5, that 'Checkoff List 1 is used to align the service water makeup system to the FWST and for initial system alignment.'

ITEM C (Continued)

"Checkoff List 1 (Fire Water System Valve Position Verification), step 106, required the following:

STEP NO.	VALVE NUMBER	DESCRIPTION AND LOCATION	REQUIRED STATUS	CHECKERS INITIALS	VERIFIED INITIALS
106	SA2301MU209	Iso. North Header, North Stairs	CLOSED CAPPED		

"Contrary to the above requirements, the record showed signatures indicating that an individual checked the position of valve SA2301MU209 on March 15, 1983, and found it to be closed and capped and that a second individual also verified that the valve position was closed and capped. On April 15, 1983, the licensee found that the position of the valve was locked open and that the valve, in fact, was required to be locked open. Subsequently, the procedure was corrected and changed to provide that the valve shall be locked open. However, at that time, a record was not made to show that the valve was checked and verified to be locked open.

"This is a Severity Level V Violation (Supplement 1) applicable to Units 2 and 3."

RESPONSE

Corrective Steps Which Have Been Taken And The Results Achieved

Operating personnel involved in the improper and incomplete verification have received formal counseling. Verbatim procedural compliance has been emphasized during shift training sessions which included the Station Manager, Operations Manager, and Units 2 and 3 Operations Superintendent. A memorandum from the Station Manager to Station Management and Station Supervisors on the "Meaning of Signatures/Initials on Station Procedures" dated May 28, 1983, was issued to formalize what signatures and initials are specifically intended to represent.

Procedure S023-7-1 was modified by TCN 3 on April 18, 1983, to reflect the locked open position of valve SA2301MU209.

Corrective Steps Which Will Be Taken To Avoid Further Items Of Noncompliance

To correct the deficiency involving the method by which improper or erroneous check list(s) are corrected, operations procedures will be modified by August 30, 1983, to delineate the proper method to denote revisions to procedures in progress or completed.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on August 30, 1983, with the issuance of the modified operations procedures.