

Southern California Edison Company

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March 26, 1993

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

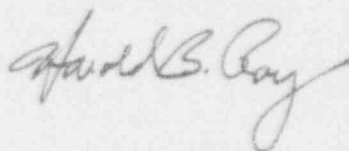
Reference: Letter from Mr. L. F. Miller (USNRC) to
Harold B. Ray (SCE), dated February 25, 1993

The referenced letter forwarded a Notice of Violation resulting from the NRC inspection conducted from January 11, 1993 through January 29, 1993, at the San Onofre Nuclear Generating Station, Units 1, 2, and 3. This inspection was documented in NRC Inspection Report Nos. 50-206/93-01, 50-361/93-01, and 50-362/93-01.

In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the Notice of Violation.

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

Sincerely

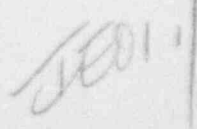


Enclosure

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

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REPLY TO A NOTICE OF VIOLATION

The enclosure to Mr. Miller's letter dated February 25, 1993, states in part:

"A. 10 CFR Part 50, Appendix B, Criterion XVI, 'Corrective Actions,' states: 'Measures shall be established to assure that conditions adverse to quality, such as... deviations... are promptly identified and corrected.'

"San Onofre Units 2 and 3 Updated Final Safety Analysis Report (UFSAR), Section 9.5.4.1. states: 'The diesel generator fuel system is designed to ANSI standard N-195.'

"ANSI standard N-195, Appendix B, 'Alternate Calculation of Fuel Oil Storage Capacity,' states: 'A minimum of 10% is added to the calculated storage requirement if this alternative calculational approach is used.'

"Contrary to the above, on June 18, 1991, the Licensee issued Calculation M-0016-008, Supplement A, 'DG Onsite Fuel Oil Requirements' which did not include the 10 percent margin required for determining minimum fuel oil storage capacity even though this error was identified in Inspection Report 50-361, 50-362/89-200, dated January 12, 1990. Calculation M-0016-008 superseded Calculation M16.4. Both calculations used ANSI standard N195, Appendix B, methods. The licensee did not correct the 10% margin omission until January 25, 1993.

"This is a severity Level IV violation (Supplement I)."

RESPONSE

I. REASON FOR THE VIOLATION

Failure to Document Discrepancy

Contrary to procedures and training, SCE individuals were aware of the error in the calculation but failed to initiate a corrective action document when the omission was identified. A Nonconformance Report (NCR) or other corrective action document should have been generated to document the deficiency.

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN

Calculation Revised

In January 1993, prior to the NRC inspection, SCE was preparing Interim Calculation Change Notices (ICCNs) for calculation M-0016-008 (which superseded M16.4) to incorporate additional loads on the diesel resulting from on-going design tasks. During the process, SCE discovered the omission of the 10% margin in the calculation and documented it on an NCR on January 12, 1993, in accordance with corrective action procedures. Revision 2 to M-0016-008 was issued on January 25, 1993, to correct the 10% margin omission. The revision also incorporated the design changes in lieu of the ICCNs.

Previous Corrective Action and Program Enhancements

Subsequent to the time personnel failed to document the deficiency, Engineering instituted substantial program and training improvements. In 1990 as part of this improvement effort, SCE instituted an enhanced training program titled "Technical Training for Nuclear Engineering and Design Organization (NEDO) Personnel." The training program includes training modules on "Problem Reporting Mechanisms," "Drawings, Codes and Standards," and "Nonconformance Reports (NCRs)." The training is required for all NEDO system engineers and supervisors.

This enhanced training program educates engineers to promptly initiate appropriate corrective action documents when errors and other deficiencies are identified in design documents, including calculations.

III. CORRECTIVE STEPS THAT WILL BE TAKEN

No further corrective actions are required.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on January 25, 1993, when the calculation was revised to include the 10% margin in the Diesel Generator fuel oil calculation.