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L. T. PAPAY
VICE PRESIDENT

June 3, 1982

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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. R. H. Engelken, Regional Administrator

Dear Sir:

Subject: Docket No. 50-361
IE Inspection Report 50-361/82-12
San Onofre Nuclear Generating Station, Unit 2

Your letter of May 7, 1982 issued IE Inspection Report 50-361/82-12 and forwarded a Notice of Violation resulting from the March 29 - April 16, 1982 routine inspection of San Onofre Unit 2 by D. F. Kirsch, G. H. Johnston, and M. M. Mendonca.

Enclosure (I) of this letter provides our response to the Notice of Violation contained in Appendix A of the subject report.

I trust the enclosure responds adequately to all aspects of the Violation. If you have any questions or if we can provide additional information, please let me know.

Very truly yours,



Enclosure I

cc: A. E. Chaffee (NRC Site Inspector - San Onofre Unit 2)

Enclosure I

Response to the Item of Non-Compliance identified in Appendix A to IE Inspection Report 50-361/82-12.

ITEM

"The San Onofre Nuclear Generating Station (SONGS), Unit No. 2, Facility Operating License No. NPF-10, dated February 16, 1982, states in paragraph 2.C(2) that, '...SCE shall operate the facility in accordance with the Technical Specifications....'

The Technical Specifications, Section 6, paragraph 6.8.1.a states that 'Written procedures shall be established, implemented and maintained covering... the applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Revision 2, February 1978.'

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, paragraphs 1.c and 1.d, lists Equipment Control and Temporary Change Method as safety-related activities that should be covered by written procedures.

SONGS procedure No. S023-0-16, Revision 3 (Temporary Modification Control), dated January 21, 1982, prescribes as follows:

- Paragraph 6.1.1.3 states 'S0(123)106, Temporary Modification Control Form, and S0(123)562, Equipment Control Form, shall be forwarded to the Supervisor of Plant Coordination for evaluation---.'
- Paragraph 6.1.1.5 states, 'The on-shift Watch Engineer shall make the final approval of the temporary modification after reviewing the Temporary Modifications Control Form, S0(123)106, and the Equipment Control Form, S0(123)562, by signing Item 8.' Item 8 indicates 'Watch Engineer Approval for Installation.'
- Paragraph 6.4.5 states, 'A yellow magnetic tag with the words, 'Temporary Modification-Number, shall be placed adjacent to the equipment control switch in the control room.'
- Paragraph 6.5.2 states, 'The Watch Engineer shall authorize normalization by signing the Temporary Modifications Control Form (Item 11).' Item 11 indicates 'Watch Engineer Approval for Restoration.'

Contrary to the above requirements, on April 14, 1982, the following conditions were identified:

- (a) On March 14, 1982, electrical jumpers were installed across LS-16 to allow starting of Salt Water Cooling pumps 2P114 and 2P307 when the normal discharge valve was closed and the emergency valve was open. Equipment control forms apparently were not prepared and forwarded to the Supervisor of Plant Coordination and Watch Engineer for evaluation and review for either of these Temporary Modifications.

- (b) No tags, magnetic or otherwise, were placed adjacent to the equipment control switches in the control room for the Temporary Modifications identified in (a), above.
- (c) The Equipment Control Form was apparently not prepared and forwarded to the Supervisor of Plant Coordination and Watch Engineer for evaluation and review for the installation of a temporary lamp holder and lamp on the chlorine Toxic Gas Isolation System 'Power On' indicator. This Temporary Modification Control Form was issued on April 2, 1982.
- (d) The Watch Engineer apparently had not authorized normalization of the following temporary modifications, on the dates indicated, by signing the associated Temporary Modification Control Forms, Item 11.
 - Restoration of modifications, on February 17, 1982, to return to service the Containment Spray Heat Trace alarm annunciator window 61A04 by removing jumpers across terminals 1431 and 1431AP at panel 2L040.
 - Restoration of modifications, on February 17, 1982, to return to service the Containment Spray Heat Trace alarm annunciator window 61A04 by removing jumpers across terminals 1427 and 1427AP at panel 2L040.
 - Removal of a temporary valve, on February 18, 1982, installed on Safety Injection Pump 2P015 seal pipe line.
 - Removal of a temporary valve, on February 18, 1982, installed on Safety Injection pump 2P016 seal pipe line.

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

RESPONSE

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

Upon becoming aware of the discrepancies noted with the installation of the electrical jumpers to permit the starting of two Salt Water Cooling Pumps, an investigation of the temporary modifications involved was initiated. Pending the outcome of this investigation, yellow magnetic tags were placed as required in the control room. On April 22, 1982, after having determined that the temporary modifications associated with Salt Water Cooling Pumps 2P114 and 2P307 were no longer necessary, the Watch Engineer directed the restoration of these systems to their previous configuration. The electrical jumpers were subsequently removed and work verified on April 22, 1982.

The temporary modifications involving the installation of electrical jumpers were actually made by the Start-Up Organization and were subsequently turned over to the Operations Group. Until turnover, these modifications were being controlled by entries in the Abnormal Equipment and Circuits Log. Upon turnover, the Operations Group prepared Temporary Modifications Control Forms on those systems having altered configurations based on the Abnormal Equipment and Circuits Log at that time. Since these temporary modifications were already in effect when the Temporary Modifications Control Forms were prepared, the Equipment Status Control Supervisor determined that Equipment Control Forms would serve no valid purpose in these cases. The date March 14, 1982, which appears in Item 9 of the Temporary Modifications Control Forms in question, is not the date the modifications were made, but rather the date on which the Temporary Modifications Control Forms were prepared for the already-existing modifications.

The temporary modification to the Toxic Gas Isolation System (TGIS) was authorized by the Watch Engineer on April 2, 1982 at approximately 2:00 p.m. when it was determined that both channels of the ammonia analyzer were inoperable. This situation requires the Control Room Emergency Air Cleanup System (CREACS) to be initiated in the isolation mode of operation within one hour if one channel cannot be restored. The temporary modification was issued in an effort to preclude CREACS initiation. Due to the brief period of time the temporary modification was in effect, the preparation of an Equipment Control Form was inadvertently neglected. A Temporary Modifications Control Form was properly prepared and contained all required signatures for the approval, installation, restoration, and verification of the temporary modification to the TGIS. The temporary modification was in effect for one and one quarter hours, with system restoration occurring at 3:45 p.m. on April 2, 1982.

Authorization to return the Containment Spray Heat Trace alarm annunciator windows to service on February 17, 1982 was granted verbally by the Watch Engineer; however, the Watch Engineer failed to sign Item 11 of the Temporary Modifications Control Form. Both temporary modifications were removed on February 17, 1982 with proper verification of system restoration made by the Unit 2 Control Room Supervisor.

Authorization to remove the temporary valves on Safety Injection Pumps 2P015 and 2P016 was also given verbally by the Watch Engineer on February 18, 1982. Again, the Watch Engineer neglected to sign Item 11 of the Temporary Modifications Control Form. The temporary valves were subsequently removed with work correctly verified on the Temporary Modifications Control Form by the Unit 2 Superintendent on February 18, 1982.

The failure of the Watch Engineer to sign Item 11 of the Temporary Modifications Control Forms for returning the Containment Spray Heat Trace alarm annunciator windows to service and for the removal of temporary valves on Safety Injection Pumps has been reviewed by the Equipment Status Control Supervisor. Since these temporary modifications had been removed two months before the lack of the Watch Engineer's signatures was identified, no further action to correct these specific oversights can be taken; however, an in-depth audit of all temporary modifications presently in effect is being conducted to determine the status of each temporary modification, whether or not each existing temporary modification is still required, and if proper disposition of the temporary modification has been made. This audit, including any required corrective action, will be completed by July 1, 1982.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NON-COMPLIANCE

An on-going internal audit of the Temporary Modification System by operations personnel will be established to identify, on a continuing basis, specific deficiencies that may exist in the Temporary Modification System. This audit will also serve to document the corrective action taken in response to any noted shortcomings. To underscore the value of the audit and ensure proper use of the Temporary Modification System, operator training will incorporate a review of Temporary Modification System deficiencies identified by the audit during the previous month.

Additionally, Operating Instruction S023-0-16, "Temporary Modification Control," will be revised to require the following:

- a. The Temporary Modification System internal audit.
- b. Quality Assurance review of each temporary modification to systems important to plant safety and the preparation of a Non-Conformance Report.
- c. The assignment of an expiration date for each planned temporary modification.

The establishment of the internal audit program and the revisions to Operating Instruction S023-0-16 will be completed by July 1, 1982.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with the provisions of Operating Instruction S023-0-16 was achieved on April 22, 1982 when the temporary modifications associated with Salt Water Cooling Pumps 2P114 and 2P307 were removed.