

*Southern California Edison Company*

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ROBERT DIETCH  
VICE PRESIDENT

January 7, 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. R. H. Engelken, Regional Administrator

Dear Sir:

Subject: Docket No. 50-361  
IE Inspection Reports 50-361/82-38  
Response to Notice of Violation  
San Onofre Nuclear Generating Station, Unit 2

Mr. T. W. Bishop's letter of December 9, 1982, issued IE Inspection Report 50-361/82-38 and forwarded a Notice of Violation resulting from the November 15 through November 19, 1982, inspection conducted by Mr. M. M. Mendonca.

The enclosure to this letter provides the Southern California Edison Company response to the Notice of Violation contained in Appendix A of Mr. Bishop's letter of December 9, 1982.

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.

Sincerely,

*Robert Dietch*

cc: A. E. Chaffee (USNRC Resident Inspector - San Onofre, Units 2&3)

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## ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. T. W. Bishop's letter of December 9, 1982.

Appendix A to Mr. Bishop's letter of December 9, 1982, states:

"Technical Specification 6.8.1.C requires that written procedures be implemented for surveillance and test activities of safety related equipment. Technical specification 4.8.2.1.b.3 requires quarterly surveillance of safety related batteries to verify that the average electrolyte temperature of ten connected cells is above 60°F. Additionally, maintenance procedure S023-I-2.13, 'Quarterly Inspection of Batteries,' paragraph 6.5.2, requires as follows: 'Average of electrolyte temperature for 10 randomly selected cells and record cell numbers, cell temperature and average temperatures...'

Contrary to these requirements on two occasions (February 15, 1982 for Class IE Battery No. B007, and May 19, 1982, for Class IE battery B009) only five cells were used to calculate average electrolyte temperature."

"This is a Severity Level V Violation. (Supplement I)"

### RESPONSE

#### 1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

Although only five cells were used in the electrolyte temperature averaging during the February and May 1982 inspections, electrolyte temperatures for all sixty cells were recorded during these inspections and all cells exceeded 60°F. In addition, the quarterly inspections of the identified batteries were satisfactorily performed in August and November of 1982 with no recurrence of the omission noted in the Notice of Violation. The batteries were, and are, in satisfactory condition.

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

The omission identified in the Notice of Violation was due to a lack of clarity in the Maintenance Data Record Form (MDRF) which is the attachment to Maintenance Procedure S023-I-2.13. The MDRF is used to record data required by the procedure to be taken and was misunderstood by the electrician performing the inspection. The MDRF has been revised to clarify the requirement to record the ten randomly selected cells used to determine the average electrolyte temperature.

#### 3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the quarterly inspections performed in August and November of 1982. Actions to prevent recurrence (MDRF revision) were completed December 15, 1982.