

*Southern California Edison Company*

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L. T. PAPAY  
VICE PRESIDENT

December 30, 1982

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SCE  
REGION V IRE  
TELEPHONE  
213-572-1474

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

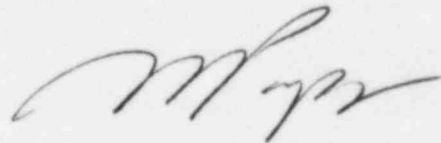
Dear Sir:

Subject: Docket No. 50-361  
IE Inspection Report 50-361/82-41  
Response to Notice of Violation  
San Onofre Nuclear Generating Station, Unit 2

Mr. T. W. Bishop's letter of December 3, 1982, issued IE Inspection Report 50-361/82-41 and forwarded a Notice of Violation resulting from the November 10 through 11, 1982, Unit 2 special inspection conducted by T. Young, Jr. and P. H. Johnson.

The enclosure to this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Bishop's letter of December 3, 1982.

It should also be noted that subsequent investigation of the incident, including detailed interviews with all personnel involved, has led to clarifying the circumstances surrounding the re-energization of the steam generator level control cabinet which was discussed on page 3 of the inspection report. We have determined from personnel interviews that although an instrument foreman did report to the Control Room the cause of the loss of power to the steam generator level control cabinet, no permission to reenergize the system was sought or obtained prior to the reenergization. The Senior Reactor Operator did, however, recognize that power was restored to the instrument channels shortly after the power supply plug was reinserted. Unfortunately, it was not recognized that the system was still in the manual mode, which resulted in the overfeeding of the steam generators, and subsequent excessive cooldown rate and partial depressurization of the Reactor Coolant System.



cc: A. E. Chaffee (USNRC Resident Inspector - San Onofre, Units 2&3)  
R. J. Pate (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 3, 1982.

### ITEM

Appendix A to Mr. Bishop's letter states:

"Paragraph (a) of 10 CFR 50.72 requires the licensee to notify the NRC Operations Center 'as soon as possible and in all cases within one hour' of the occurrence of certain events. The first such event listed is 'Any event requiring initiation of the licensee's emergency plan or any section of that plan.' This event is also identified in 10 CFR 50.72(b) as one which requires the licensee to '...maintain an open, continuous communication channel with the NRC Operations Center...' Tab C1 of the licensee's Emergency Procedure S023-VIII-11.1 classifies initiation of the High Pressure Safety Injection (HPSI) System and flow indication greater than 5 gpm (in Modes 1, 2, 3, and 4) as an Unusual Event. Emergency Procedure S0123-VIII-11 further states that the Shift Supervisor should make all reasonable efforts to verify and declare the appropriate condition within 15 minutes.

"Contrary to these requirements, proper notifications were not made following the plant trip and transient which occurred on November 9, 1982. During this event the HPSI system actuated at approximately 4:01 p.m. and began to inject greater than 5 gpm shortly thereafter. Operations personnel verified by 4:04 p.m. that HPSI flow was greater than 200 gpm. However, the licensee's notification to the NRC Operations Center at 4:43 p.m. did not report an unusual event and an open, continuous communication channel was not maintained. An Unusual Event was not declared until 5:40 p.m., and was not reported to the NRC Operations Center until 6:40 p.m. (all times PST).

"This is a Severity Level IV Violation (Supplement I)"

### RESPONSE

#### Corrective Steps Which Have Been Taken And The Results Achieved

No useful purpose would be served by additional notification following identification of the item of noncompliance since:

1. The NRC had been advised of the incident at 4:43 p.m., pursuant to 10 CFR 50.72(a)(7), prior to declaration of an Unusual Event requiring notification, pursuant to 10 CFR 50.72(a)(1) and 10 CFR 50.72(b);
2. The NRC San Onofre Resident Inspector was advised of the event at approximately 4:30 p.m. The Resident Inspector promptly went to the Control Room, monitored activities and received subsequent briefings;

3. Subsequent discussions were held with NRC representatives regarding the initiating event, licensee response, and corrective actions, prior to the identification of the item of noncompliance by the NRC; and
4. The event had been terminated prior to the identification of the item of noncompliance by the NRC.

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

The requirement to perform an Emergency Action Level (EAL) classification evaluation within 15 minutes has been confused with reporting requirements for offsite notifications. To preclude further confusion, operating personnel are receiving instructions, and Station Operating Procedures are being strengthened, to assure that the following criteria are clearly delineated:

1. Recognition and classification of initiating events that require initiation of the Emergency Plan are to be accomplished as soon as possible to ensure that reporting to the NRC can be accomplished within one hour of the initiating event.
2. Notification to the NRC of events requiring initiation of the Emergency Plan will be made within one hour of the initiating event pursuant to 10 CFR 50.72(a), and an open continuous communication channel with the NRC Operations Center will be established.
3. Notification to offsite agencies, other than the NRC, of events classified as Unusual Events, will be initiated within two hours of the declaration of the Unusual Event, pursuant to our approved Emergency Plan.
4. Notification to offsite agencies, other than the NRC, of events classified as Alert, Site Emergency or General Emergency, will be initiated immediately following declaration of the Alert, Site Emergency and General Emergency, pursuant to our approved Emergency Plan.

The Date When Full Compliance Will Be Achieved

Implementation of the corrective actions described above will be completed by March 15, 1983.