

Southern California Edison Company

SCE

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VICE PRESIDENT

January 3, 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:

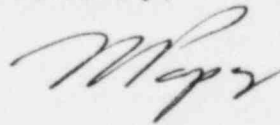
Subject: Docket No. 50-361
IE Inspection Reports 50-361/82-39, 50-362/82-31
Response to Notice of Violation
San Onofre Nuclear Generating Station, Unit 2

Mr. J. L. Crews' letter of December 9, 1982, issued IE Inspection Reports 50-361/82-39, 50-362/82-31 and forwarded a Notice of Violation resulting from the October 26 through November 8, 1982 inspection conducted by Mr. A. Chaffee.

The enclosure to this letter provides the Southern California Edison Company response to the Notice of Violation contained in Appendix A of Mr. Crews' 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,



Enclosure

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

ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. J. L. Crews' letter of December 9, 1982.

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

"Operating License NPF-10 section 2.C(19)b states, in part:

- '1. SCE shall develop and implement administrative procedures to limit the working hours of individuals of the nuclear power plant operating staff who are responsible for manipulating plant controls or for adjusting on-line systems and equipment affecting plant safety which would have an immediate impact on public health and safety.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amount of overtime to be used, the following guidelines shall be followed:

- a. An individual shall not be permitted to work more than 16 hours straight (excluding shift turnover time).
- b. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period (all excluding shift turnover time).

Any deviation from the above guidelines shall be authorized by the station manager, his deputy, the operations manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime will be reviewed monthly by the station manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.'

Contrary to the above requirements:

- 1) One Unit 2 Senior Reactor Operator worked 26 hours in a 48 hour period from September 6 through September 8, 1982 without appropriate management authorization.
- 2) One Unit 2 Reactor Operator worked 25 hours in a 48 hour period from September 6 through September 8, 1982 without appropriate management authorization. The same Unit 2 Reactor Operator worked a 17 hour shift from September 7 through September 8, 1982, without appropriate management authorization.

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

RESPONSE

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

Investigation into the incidents described in the above Notice of Violation revealed that, although scheduled overtime was being monitored and proper authorizations issued, unscheduled overtime, such as caused the specific deviations cited, was not always recorded and examined for compliance with the cited license provision. Unscheduled overtime can result from "holdovers" if, for example, a watch relief is late or shift change is otherwise delayed.

As Corrective Action, Operations promptly issued a memorandum requiring approval of all overtime by the Watch Engineer. The resulting approval record is then incorporated into the overall tracking of overtime to assure compliance with the license.

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

The problem identified in the above Notice of Violation and the difficulty of keeping track of overtime worked from day-to-day has been discussed with the NRC, including the Resident Inspector and other personnel from Region V. Station Order S0123-A-139, "NRC overtime Restrictions," and procedure S0123-VI-19.0, "Deviation from NRC Excessive Overtime Guidelines", were issued in October, 1982 and training on the order and procedure were provided. Adherence to the provisions of the order and procedure will provide compliance with the license requirements for authorization of overtime. Based on the administrative difficulty of keeping track of all overtime, we are evaluating additional measures which may facilitate the administration of overtime tracking and approvals. This may include the use of an Automatic Data Processing (ADP) system to simplify the record keeping.

Station management is acutely aware of the effects of overtime on operating personnel, and as the number of trained, licensed operators is increased, work schedules will be implemented to further reduce overtime requirements.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with the provision of Operating License NPF-10 was achieved on November 1, 1982 with the issuance by the Station Operations Manager of a memorandum governing the approval of unscheduled overtime.