

Southern California Edison Company

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L. T. PAPAY
VICE PRESIDENT

March 3, 1983

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REGION V 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: R. H. Engelken, Regional Administrator

Dear Sir:

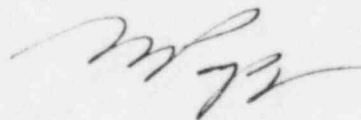
Subject: Docket No. 50-361
IE Inspection Reports 50-361/83-02, 50-362/83-02
Response to Notice of Violation
San Onofre Nuclear Generating Station, Unit 2

Mr. T. W. Bishop's letter of February 4, 1983, issued IE Inspection Reports 50-361/83-02, 50-362/83-02 and forwarded a Notice of Violation resulting from the January 10 through January 14, 1983 inspection conducted by Messrs. J. H. Eckhardt and D. F. Kirsch.

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 February 4, 1983.

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 and 3)

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"(2) In the cable spreading area adjacent to the Unit 2 Control Room the following items were adrift: one wooden workbench which was not in use, unsecured scaffolding which was not in use, one broken broom handle, and one plastic light bulb cover resting on cable in a Class IE cable tray.

"(3) In the Chiller Room No. 117, the following items were resting on the floor: three uncovered 5 gallon buckets full of oil, one uncapped 5 gallon metal can containing oil, and one uncapped 1 gallon metal can containing oil.

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

RESPONSE

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTED ACHIEVED

The items identified in the Notice of Violation above (chair, bucket of rollers, etc.) were removed from the Control Building Area behind the Unit 2 main control panels, cable spreading area and Chiller Room No. 117. The door which was leaning against an adjacent panel has been removed. A maintenance Work Order has been prepared to replace this door.

The above activities were completed by January 24, 1983.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

- (a) As of January 18, 1983, increased authority was given to Station Housekeeping forces to remove equipment and material and to clean up areas regardless of Union/Craft jurisdictions, which had been a cause for reticence in the past.
- (b) A training film is being made addressing Procedure S0123-A-130, "Station Housekeeping and Cleanness Control." This film will be shown to the Station supervisory personnel (attendance will be mandatory). Supervision's responsibilities identified within S0123-A-130 will be stressed during this training session.

The Training film will also be included in the Blue/Red Badge training program. This action will ensure that all personnel regardless of Company affiliation (Station, Project, Contract, etc.) who have unescorted access to the protected areas will see this film as part of their badge training or yearly badge re-training.

Training of personnel in housekeeping responsibilities and practices will provide a basis for disciplinary action for any future infractions. Such disciplinary action will further reduce the possibility of recurrence.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance relative to the identified violations was achieved by January 24, 1983. Corrective steps to avoid further violations will be in place by April 1, 1983, by which time Station supervision will have received training in housekeeping responsibilities and practices and such training will be incorporated into the badging program.

ENCLOSURE

Response to the Notice of Violation contained in Appendix A to T. W. Bishop's letter of February 4, 1983.

Appendix A to Mr. Bishop's letter of February 4, 1983 states:

"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.'

"Procedure No. S0123-A-130, Revision 1, Station Housekeeping and Cleanliness (sic) Control, prescribes in paragraph IV.D general housekeeping requirements for all zones. Specifically, the following are prescribed:

" " Paragraph IV.D.3.: 'Rags, paper, or other debris shall be placed in suitable waste containers.'

" " Paragraph IV.D.6: 'Hoses, temporary leads, portable gear, tools, etc., shall be properly stored when not in use.'

" " Paragraph IV.D.7: 'Trash and debris shall not be allowed to accumulate in any area and as a minimum shall be removed to the larger outside trash receptacles once per working shift in areas of high activity and as appropriate in other areas. Cleaning and pickup shall be accomplished by personnel assigned by the work supervisor to ensure that areas are kept clean during activities rather than at the completion of the activities only.'

" " Paragraph IV.D.8: 'Flammable material such as solvents etc. shall be used only where authorized by approved procedures in quantities limited to just accomplish the activity specified. Excess flammable materials shall be relocated to authorized storage areas immediately after use.'

" " Paragraph IV.D.11: 'Tool cabinets or other such temporary items which could become a hazard to safety related equipment or personnel during a seismic event must be securely fastened or moved to a more suitable location.'

"Contrary to the above requirements, on January 11, 1983, the following conditions existed:

"(1) In the control building area behind the Unit 2 main control panels the following items were lying on the floor: one broken chair, one bucket of cable pulling rollers, one vacuum cleaner hose, three wooden boards, several pieces of plastic and one bucket of dried penetration sealing material. In addition, a push cart full of paper and other debris was located adjacent to the rear wall, several instrument panel doors were ajar, and one Class IE panel door was completely removed and leaning against an adjacent panel.