

*Southern California Edison Company*

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September 14, 1994

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VICE PRESIDENT

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U. S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Reply to a Notice of Violation  
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter from Mr. A. B. Beach (USNRC) to Mr. Harold B.  
Ray (Edison), dated August 15, 1994

The referenced letter forwarded a Notice of Violation resulting from the NRC Residents' inspection conducted from May 29 through June 30, 1994, at the San Onofre Nuclear Generating Station, Units 2 and 3. This inspection was documented in NRC Inspection Report Nos. 50-361 and 50-362/94-17, dated August 15, 1994. This letter provides Edison's reply to the Notice of Violation.

The violation states, in part, "...Contrary to the above, on June 1, 1994, during the 6 a.m. operations shift relief, Unit 3 control room operators failed to note the inoperability of control room reactor coolant system wide-range cold leg Temperature Recorder 3TR0125. This recorder is located on Main Control Board CR-50. The recorder was inoperable because the recorder pen was not engaging the recorder paper. The operators failed to indicate the problem on the shift relief status sheet. The condition existed from approximately 4 a.m. that morning until 10:30 a.m., when it was discovered by an NRC inspector."

The reason for the violation was an oversight by control room operators. They failed to notice, during the 6 a.m. shift rounds, that one of the two recording pens on the reactor coolant system cold leg (loop 2A) temperature recorder, 3TR0125, was not inking. The loop 2A recorder pen had moved slightly out of contact with the paper, while the other loop 1B pen continued to record. The recorder was otherwise operating correctly. Upon identification of the non-inking pen on 3TR0125, the pen was promptly moved back into contact with the chart paper and resumed tracing loop 2A temperature. This recorder pen is only 1 of 51 cold leg temperature indications (monitoring various cold legs) available to control room operators. Consequently, Edison believes this oversight had minimal safety significance.

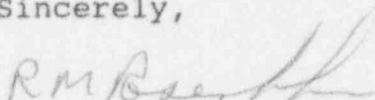
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Normally, our corrective action for such an oversight would be to counsel the individuals involved to reinforce our performance expectations. However, after this performance error, and as a result of other unrelated events, Operations Management conducted special standdown meetings during which the need for attention to detail in monitoring plant parameters and control boards was reinforced with all operating crews. These meetings, which included the crew involved in this performance weakness, were deemed sufficient corrective action for this event as well.

Full compliance was achieved on June 1, 1994, when the pen for 3TR0125 was pushed back into contact with the recorder paper.

If you have any questions or require additional information, please call me.

Sincerely,



cc: L. J. Callan, Regional Administrator, NRC Region IV  
A. B. Beach, Director, Division of Reactor Projects, NRC  
Region IV  
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC  
Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units  
2 & 3  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3