

Southern California Edison Company

23 PARKER STREET

IRVINE, CALIFORNIA 92718

RICHARD M. ROSENBLUM
VICE PRESIDENT

TELEPHONE
714-458-4550

September 26, 1994

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

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

- References: (1) Letter from Mr. A. Bill Beach (USNRC:RIV) to
Mr. Harold B. Ray (Edison), dated July 12, 1994
(Inspection Report Nos. 50-361/362 94-12)
- (2) Letter from Mr. R. M. Rosenblum (Edison) to NRC
Document Control Desk, dated August 11, 1994

Reference 1 transmitted the results of NRC Inspection Report No. 50-361/362-94-12, and included a Notice of Violation for failing to follow procedures. The violation indicated that maintenance personnel performed step 6.4.3.15 (applying RTV) out of sequence after performing step 6.4.3.18 [completing Component Cooling Water (CCW) inboard and outboard bearing inspection work].

Reference 2 transmitted the Southern California Edison reply to the subject Notice of Violation. This letter provides additional information obtained from our Maintenance Division Experience Report (MDER) investigation, which had not been completed at the time of our initial reply.

The MDER reviewed in detail the work performed on the inboard and outboard bearings. Due to the passage of time since the event, and inconsistencies in the recollections of involved personnel, it was not possible to definitively establish all the facts and circumstances. However, based on our best judgement of what probably occurred, Edison believes:

040075
9410040072 940926
PDR ADOCK 05000361
PDR

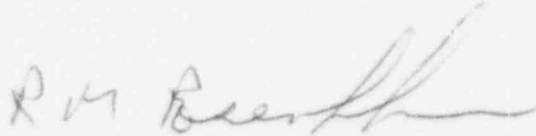
IF01
1/0

- (1) With regard to applying the RTV (Step 6.4.3.15), there was inadequate communication between the Maintenance General Foreman, the Foreman, and the crew. Specifically, the crew knew how to correctly assemble the bearings; the crew requested approval to deviate from the procedure; and the General Foreman gave prior approval to work steps 6.4.3.15 through 6.4.3.18 simultaneously (steps out of sequence). Thus, the pump bearings were assembled correctly and approval existed to deviate from the procedure. However, due to inadequate communications, the crew was unable to fully explain the scope of their approval to deviate from the procedure to the NRC Resident Inspector.
- (2) Edison believes that the RTV was applied in compliance with requirements. However, Edison personnel were slow in investigating the incident and, as a result, Edison Maintenance management and supervision failed to inform the NRC inspectors that approval, in accordance with SONGS administrative procedures, had been obtained.
- (3) Although Edison's investigation concluded that Maintenance personnel had appropriate approval to apply RTV (step 6.4.3.15) after completing step 6.4.3.18, the investigation did identify the possibility that a separate aspect of the procedure was not properly performed. Specifically, prior to stopping work to obtain approval to work steps 6.4.3.15 through 6.4.3.18 out of sequence, personnel correctly performed most of step 6.4.3.15 (up to the action of applying RTV) but then jumped to step 6.4.3.17 to place the bearing cap on the adapter. The reason for the error was that this section of the procedure is poorly written. On August 30, 1994, a revision to procedure S023-I-8.148 (Goulds Model 3415 Inspection and Overhaul) was issued to improve the procedure.

As noted in Reference 2, Station management has been sensitized to the necessity of performing more thorough and timely investigations, and of the need to ensure Edison affords the inspector a full understanding of events. Additional corrective actions are being developed in response to the MDER.

Because Edison was slow to investigate this incident, and it appears that Step 6.4.3.17 was performed out of sequence, without prior approval, no withdrawal of the violation is being requested.

If you have any further questions, please contact me.



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