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May 22, 1995

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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 April 20, 1995

The referenced letter forwarded the NRC Maintenance Reliability Team Inspection Report Nos. 50-361 and 50-362/95-01 conducted by Mr. Ian Barnes and the inspectors listed in the enclosure to the referenced letter. The inspection was conducted January 30 through March 14, 1995, at the San Onofre Nuclear Generating Station, Units 2 and 3. The enclosure to the above referenced letter also transmitted two Notices of Violation. The purpose of this letter is to respond to the two violations, as follows:

VIOLATION A

Technical Specification 6.8.1 requires 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 S023-6-30, "Switchyard Inspection and Operation," TCN 1-10, June 1, 1993, Section 6.18.1.1 states, in part, "Prior to Switchyard entry, authorization must be obtained from either the Common Control Operator ... or the Shift Superintendent ...."

Contrary to the above requirements, on February 16, 1995, Edison's maintenance personnel entered the switchyard to perform maintenance without obtaining prior authorization from either the common control operator or the shift superintendent.

The reason for the violation was that Edison's Transmission and Substation (T&S) Department personnel, who perform routine switchyard maintenance at SONGS and other Edison facilities, erroneously assumed it was consistent with the intent of the sign to enter the switchyard prior to starting work and use the phone inside the switchyard. Using the phone inside the switchyard is common T&S practice at other Edison plants. Human factors analysis classifies this as a "habit intrusion."

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The switchyard is not observable from the Control Room, and operations personnel were not aware the T&S personnel were calling from inside the switchyard, and therefore were not able to avoid this violation.

As corrective action, SONGS locks have been placed on the switchyard vehicle access gates. The keys for these locks are controlled by the San Onofre Operations and Security divisions. S023-6-30 was changed to provide enhanced switchyard access controls during both normal operations and High Risk Evolutions, including reduced inventory and degraded offsite sources. On February 27, 1995, a letter was sent to the Edison T&S Department by the San Onofre Operations Manager notifying them of the SONGS locks and access controls. The letter also emphasizes the requirement to request access authorization prior to entering the switchyard.

Full compliance was achieved on March 18, 1995, when Edison issued the TCN to S023-6-30 addressing the new locks and entry requirements.

#### VIOLATION B

10 CFR Part 50, Appendix B, Criterion IX, requires, in part, that measures shall be established to assure that special processes, including welding, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes. Paragraph QW-200 in article II of Section IX in the ASME Code requires welding procedure specifications to describe all of the essential, nonessential, and, when required, supplementary essential variables for each welding process used in the welding procedure specification.

The violation identified two examples where weld documentation was incorrect:

##### Improper Maximum Interpass Temperature

In the first example, Bechtel Engineering had developed Welding Procedure Specification (WPS) P1-AT-Lh(CVN), Revision 0, for Edison to utilize a new class of filler rod material. The WPS specified a maximum interpass temperature that was 50 degrees F greater than what was supported by the Procedure Qualification Record (PQR) [i.e., 600 degrees versus 550 degrees].

The reason for the violation was personnel error. The Bechtel WPS reviewers did not exert sufficient attention to detail in their review. Bechtel performed an internal self-assessment of similar WPSs, and their review indicated this was an isolated event. As corrective action, Bechtel has corrected and resubmitted the welding specification, WPS P1-AT-Lh(CVN), to Edison for approval. Edison reviewed and approved the submitted WPS.

In addition, Edison's Nuclear Engineering and Design Organization (NEDO) ASME Code Engineer (ACE) should have also reviewed and approved the WPS. However, there is no evidence that the WPS was provided to the ACE. This failure appears to be an isolated oversight in the routing of the WPS.

Edison performed a review of weld records from the Unit 2 and Unit 3 Cycle 7 outages and determined that the WPS had been used only once before in the Unit 3 Cycle 7 outage. Those welds were evaluated and determined to be acceptable.

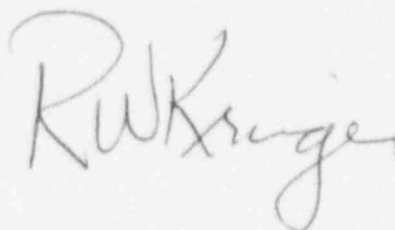
#### Interpass Temperature Documentation

The second example involved ASME weld records which incorrectly omitted the requirement to monitor interpass temperature. The weld records were used to weld replacement main feedwater piping subassemblies during the Unit 2 Cycle 8 outage. The reason for the violation was individual personnel error by a Bechtel welding engineer. The work process failed to include an independent review by either Edison or Bechtel. Edison performed a review of similar weld records from the Unit 2 and Unit 3 Cycle 7 outages, and concluded this was an isolated occurrence.

As corrective action for both examples, Edison conservatively removed the subject Unit 2 feedwater piping welds. They were rewelded using the revised WPS and weld record, and interpass temperature was correctly monitored and documented. This work was completed on March 31, 1995, when full compliance was achieved. In addition, to improve the review and oversight of contractor welding activities, the Station Technical Codes and Welding Group has assumed responsibility for independent review and approval of both WPSs and ASME weld records.

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  
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