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KENNETH P. BASKIN
VICE PRESIDENT

June 21, 1984

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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. J. B. Martin, Regional Administrator

Dear Sir:

Subject: Docket No. 50-362
IE Inspection Report 50-362/84-11
Response to Notice of Violation
San Onofre Nuclear Generating Station, Unit 3

Mr. T. W. Bishop's letter of May 23, 1984, issued IE Inspection Report 50-362/84-11 and forwarded a Notice of Violation resulting from the March 7 through March 16 and March 30 through April 29, 1984, routine inspection conducted by Messrs. A. E. Chaffee, J. P. Stewart, and A. D'Angelo. Enclosure I to this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Bishop's letter of May 23, 1984. As discussed with Mr. D. Kirsch of your staff on June 18, 1984, this response was delayed in order to provide a complete response.

Mr. Bishop also requested we discuss any actions taken or planned to assure that our program for verifying Correct Performance of Operating Activities as required by License Condition 2.C.(17), is properly implemented in maintenance, test and surveillance procedures for safety-related equipment. Enclosure II provides our response to this concern.

If you require additional information, please so advise.

Sincerely,

Kenneth P. Baskin

Enclosures

cc: A. E. Chaffee (USNRC Resident Inspector, Units 1, 2 and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)
A. J. D'Angelo (USNRC Resident Inspector, Unit 1)

ENCLOSURE I

Response to the Notice of Violation contained in Appendix A to Mr. T. W. Bishop's letter of May 23, 1984.

Appendix A to Mr. Bishop's letter states:

"Paragraph 6.8 of the Technical Specification states in part;

'6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

'c. Surveillance and test activities of safety-related equipment.'

"Operating Instruction S023-0-23, titled 'Equipment Control Status', implements the necessary controls to assure that equipment made inoperable by planned activities, such maintenance and surveillance, is returned to service in an operable status with required test procedures complete. Procedure S023-0-23 paragraph 6.7.2 states in part:

'6.7.2 The CO shall ensure that the 'Test Required' section is completed by the person (or persons) responsible for the testing activity following successful completion of the required test(s).

'6.7.2.1 This signature signifies the test has been successfully conducted.'

"Contrary to the above, Equipment Control form #3-30242 which implemented the Plant Protection System Response Time Test on Unit 3 was signed as completed by the person responsible for the testing activity on February 3, 1984, before the response time procedure had been completed and signed on February 16, 1984.

"This is a Severity Level 4 Violation (Supplement 1) applicable to Unit 3."

ENCLOSURE I (Continued)

RESPONSE

Corrective Steps Which Have Been Taken and Results Achieved

We have concluded that this violation was caused by insufficient training of the technician responsible for the Plant Protection System Response Time Test for Unit 3 on February 3, 1984, and his supervisor in the meaning and significance of their signatures and initials on Station procedures. In this case, the technician involved believed that other Equipment Control Forms (ECF's) were active such that the Plant Protection System (PPS) would not be declared operable without the required retests. He therefore signed the "Test Required" block of ECF 3-30242 as complete before completion of the retest, erroneously believing that all required PPS testing would be completed by means of other outstanding ECF's before the system was declared operable. Consequently, corrective steps taken were in the area of training for technicians and supervisors.

Training was given to Instrument and Control (I&C) and Electrical Test personnel addressing their responsibilities with respect to verifying equipment operability, and explicit direction was given to all I&C and Electrical Test personnel on restoration of equipment. Additionally, Maintenance, I&C, and Electrical Test personnel have been trained on the meaning of signatures to document work performed. This training was presented to all personnel via written directive and/or training sessions. The meaning of signatures and initials in Station procedures was clarified by memorandum from the Station Manager to Station Management on June 4, 1984.

In addition, Maintenance, I&C, and Electrical Test supervisory and planning personnel received formal training covering: Station policy on the significance of signatures or initials on any station procedure, form, or instruction, including the Equipment Control Form; Station administrative procedures including the procedures which govern the Equipment Control process; and the importance of verbatim compliance and the meaning of signatures. This training was completed on May 31, 1984.

Although not a direct cause of the violation, administrative procedures have been reviewed to ensure proper controls are in place and the implementing procedures are clear, and Temporary Change Notices (TCN's) were issued on June 13, 1984, to SO1-I-1.4.1 and SO23-I-1.2, "Maintenance Order Preparation, Use and Scheduling," to clarify the administrative control process for Equipment Control Forms (ECF's). These TCN's clarify and emphasize that all tests required prior to releasing the clearance and the required portions of the "Return to Service" section of the ECF must be completed before signing to release the clearance.

ENCLOSURE I (Continued)

RESPONSE (Continued)

Corrective Steps Which Will Be Taken to Avoid Further Items of Noncompliance

Ongoing formal training will be developed for Maintenance, I&C, and Electrical Test personnel on the ECF requirements. This training will commence July 9, 1984.

We will review the aforementioned training, and will determine whether this training should be provided to other personnel.

An ECF "Work Process and Testing Flow Diagram" will be routed along with the TCN's addressed above as required reading to provide additional emphasis and clarification to all Maintenance, I&C, and Electrical Test personnel of ECF requirements. This information will be promulgated by June 22, 1984.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 16, 1984, with the completion and signature of EC form #3-30242.

ENCLOSURE II

Actions Planned or Taken Verifying Correct Performance of Operating Activities in Maintenance, Test and Surveillance Procedures for Safety-Related Equipment

Actions Taken to Verify Correct Performance of Activities

All of the aforementioned items are considered as actions planned or taken to verify correct performance of activities as presented in our response to the violation. Additionally:

The requirement for dual verification of appropriate procedural steps was re-emphasized to both Station and Project management by letter from the Station Manager on March 8, 1984.

A review of safety-related Operations surveillance procedures and Maintenance procedures (including I&C procedures) was undertaken to ensure procedural steps contain adequate dual verification and/or functional testing requirements for restoration of equipment. In addition, all I&C and Electrical Test personnel have received direction on procedural requirements to meet the current restoration criteria and all Maintenance procedure writers were individually counseled to ensure their understanding of restoration requirements.

Administrative Procedures SO1-I-1.4.1 and SO23-I-1.2, "Maintenance Order Preparation, Use and Scheduling," have been revised to require verification signatures on Work Plan Extensions where complete procedures are not used to ensure adequate restoration controls for nonroutine maintenance actions. These TCN's were issued June 14, 1984.

Actions Planned to Verify Correct Performance of Activities

A training program will be developed for craft and technician personnel on ECF's, Dual Verification and Jumper/Lifted Lead requirements, Meaning of Signatures, Verbatim Compliance and lessons learned from previous NRC audits and violations. This training program will commence July 9, 1984.

We will review the aforementioned training, and will determine whether this training should be provided to other personnel.

The requirements for dual verification and/or functional testing and the meaning of signatures in Station procedures will be incorporated into the Maintenance, and Operations procedure writer's guides. These requirements are already contained in the Station procedure writer's guide.

All safety-related Operations surveillance and Maintenance procedures (including I&C) will be revised to include adequate dual verification and/or functional testing for critical procedural steps. Operations and Maintenance safety-related procedures requiring enhancement will be revised by August 6, 1984, and September 4, 1984, respectively.