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August 1, 1984

REGION V IRE

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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 Nos. 50-361 and 50-362  
IE Inspection Reports 50-361/84-14 and 50-362/84-14  
Review of NRC Observations  
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, "Response to Notice of Violation," K. P. Baskin (SCE)  
to J. B. Martin (NRC), dated June 25, 1984

Mr. R. A. Scarano's letter of May 25, 1984, issued the subject  
IE Inspection Reports and forwarded a Notice of Violation resulting from the May 6  
and 7, 1984, special inspection conducted by Mr. G. P. Yuhas. The referenced  
letter provided our response to the Notice of Violation.

The purpose of this letter is to more fully respond to the inspector's  
observations concerning activities associated with the event. We have  
reviewed the observations in the context of Mr. Scarano's forwarding letter  
with respect to generic corrective actions.

The May 5, 1984 Unusual Event, and observations identified in the subject  
report, are of generic importance because they represent opportunities to  
identify where management attention may result in significant improvements in  
plant performance and compliance. Following a careful evaluation, actions  
have been taken as described below. A number of these actions were already  
underway and are also noted in the subject inspection reports or the reference  
response.

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Unit 3 has experienced a higher level of Reactor Coolant System radioactivity than Unit 2. As a result, we had identified a number of circumstances (e.g., minor leakage from the Radioactive Waste Gas System during system manipulations) where airborne radioactivity levels could become significant, relative to various action requirements. We had monitored these developments carefully and had initiated action to revise designs and modify operating and maintenance approaches. In the case of the May 5, 1984 Unusual Event, however, we had not adequately forecasted the circumstances which then existed such that the Shift Superintendent, and other personnel on shift, were promptly led to make the Unusual Event declaration.

Actions which were already underway or that have now been taken are described below.

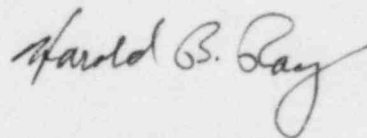
1. Increasing alarm setpoints to more appropriate values allowed by the Technical Specifications, thereby eliminating unnecessary and distracting alarms was already being planned. We expedited our review of the effluent alarm setpoints and several monitor setpoints, including the wide range gas monitor 2 and 3 RE-7865, have now been raised to more appropriate values.
2. Training to ensure Operators are especially knowledgeable of effluent alarms to be expected during minor operating events and releases as a result of the increased level of Reactor Coolant System radioactivity is being provided. We have completed initial Operator training in this area and will include additional training on monitor alarm setpoints in the 1984-1985 Operator Requalification Program (ORP).
3. Significant resources were directed to maintaining the operability of effluent monitors and recorders to maximize the effluent assessment information available to the Operators. We increased our efforts to improve monitor availability and are also proceeding with the procurement of more reliable recorders.
4. Special Operator training classes devoted to full understanding of the release paths, effluent monitor performance, and special considerations such as the "streaming effect" in the common plenum are being provided. We have discussed the "streaming effect" in shift briefings and will include additional training on effluent pathways and monitor performance in 1984-1985 ORP.
5. Operator sensitivity and awareness of the effluent and radiation monitor readings during shift turnover and during unplanned releases is being enhanced. We have conducted shift briefings on the importance of these alarms. Operators are documenting any radiation monitors in alarm on shift turnover sheets and significant background radiation level changes will be noted on the common operator log, common operator turnover sheet, and brought to the Control Room Supervisor's attention.

6. Station emergency and operating procedures are being validated to ensure clarity in responding to abnormal conditions or monitor readings expected during these circumstances. We have revised several procedures to further clarify the conditions under which prompt declaration of an emergency is required.
7. Equipment and instrumentation is being reviewed to ensure against conflicting information, such as the plant computer and the corresponding radiation monitor having different alarm values. We are reviewing these problems and will complete an assessment by October 12, 1984.

Involvement of management is essential in controlling and anticipating plant performance, ensuring personnel sensitivity to system interactions, and in requiring alertness and attention to detail. This involvement is being promoted at San Onofre in a number of specific ways, and we believe it is producing positive and effective results.

If you require any additional information, please so advise.

Sincerely,



Enclosure

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