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Southern California Edison Company

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RICHARD M. ROSENBLUM
VICE PRESIDENT

TELEPHONE
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February 28, 1994

Mr. S. A. Richards, Acting Director
Division of Reactor Safety and Projects
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane
Walnut Creek, California 94596-5368

SUBJECT: Docket Nos. 50-206, 50-361 and 50-362
Response to Allegation
San Onofre Nuclear Generating Station, Units 1, 2 and 3

REFERENCE: Letter from USNRC (S. A. Richards) to SCE (Harold B. Ray), dated February 1, 1994

Dear Mr. Richards:

Your letter of February 1, 1994 (Reference), which was received by Southern California Edison (SCE) on February 2, 1994, provided notification that the Nuclear Regulatory Commission (NRC) had received an allegation about activities at the San Onofre Nuclear Generating Station (SONGS). Your letter requested that SCE review the information and respond to your office with the results of the review, including any corrective actions.

SCE has conducted an investigation and determined that the allegation is unfounded. Details of SCE's findings are in the enclosure.

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10 CFR 2.790

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The enclosure summarizes the results of our review and contains information which was categorized by your office as material that should be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790.

Please call me should you have further questions regarding this matter.

Sincerely,

R. M. Rosenblum
Vice President
Engineering and Technical
Services

Enclosure

cc: Mr. K. E. Perkins, Acting Regional Administrator,
NRC Region V
NRC Resident Inspectors Office, San Onofre Units 1, 2 and 3

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ENCLOSURE

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**INVESTIGATION OF AN ALLEGATION ABOUT ACTIVITIES AT THE SAN ONOFRE NUCLEAR GENERATING STATION**

By letter dated February 1, 1994 (Reference), Region V of the U.S. Nuclear Regulatory Commission (NRC) notified the Southern California Edison (SCE) that it had received an allegation pertaining to activities at the San Onofre Nuclear Generating Station (SONGS) and requested that SCE investigate the allegation.

The results of SCE's investigation are detailed below.

Allegation:

"The NRC has received information that vendor documents collected by San Onofre Nuclear Generating Station in the last one-and-a-half years have not been evaluated for their impact on the plant. Specifically, vendor documents for equipment installed during the last two plant outages have not been issued by CDM and, as a result, the vendor information has not been evaluated for its potential impact on existing plant operation and maintenance procedures. The only vendor information being evaluated is if the information is contained in design change packages."

Findings:

In order to respond to this allegation it has been divided into four statements and the associated findings as follows:

1. **Statement:** ". . .vendor documents collected by San Onofre Nuclear Generating Station in the last one-and-a-half years have not been evaluated for their impact on the plant."

   **Findings:** A system of controls over Vendor Technical Information (VTI) has been established by SCE. This system requires that VTI received from vendors be evaluated for its affect on the plant.

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Impact reviews on the information received are conducted by the responsible organization in a time frame commensurate with the importance of the VTI to plant activities. Any procedure or program change resulting from these reviews are developed consistent with the need to support ongoing plant activities. The results of the impact evaluations and procedure or program change actions are tracked until completion.

In response to this allegation, a review of implementation of the above system indicated that there are approximately 9,000 documents in the technical information system (VTIS). Of these documents, there are approximately 200 VTI awaiting evaluation for plant impact. The backlog is managed to assure that those documents determined to have direct impact on the current plant activities are given the highest priority for evaluation and are evaluated in time to support plant operations and maintenance. The backlog has been reducing over time and is expected to be significantly reduced over the next year during the non-outage periods.

A significant quantity of documents of VTI contained within the configuration control system were processed during the 1993 calendar year (which encompassed the last two refueling outages) associated both with existing plant equipment, measuring and test equipment, and new equipment installed during the Cycle 7 outage. The approximately 200 VTI documents contained within the backlog are considered a small number in proportion to the information presently contained within the VTIS. Also, an examination of some of the VTI reviews processed in 1993 indicated that only a small percentage of the documents which had been reviewed had been determined to have any impact on plant procedures or programs.

Since the backlog is managed to assure that those documents determined to have impact on the current plant activities are evaluated in time to support plant operations and maintenance, this statement of the allegation is unfounded.

2. **Statement:** ". . . vendor documents for equipment installed during the last two plant outages have not been issued by CDM. . ."

   **Findings:** VTI is not "issued" by CDM. CDM receives VTI, assigns a reference number and forwards the VTI to Configuration Control. Configuration Control in turn forwards the VTI to the appropriate organizations for evaluation and incorporation into plant documents. VTI can be retrieved from CDM for reference as required.

   This statement of the allegation is unfounded.

3. **Statement:** ". . .vendor information has not been evaluated for its potential impact on existing plant operation and maintenance procedures."

   **Findings:** As noted in our response to Statement 1 above VTI is evaluated for impact on plant documents. While a backlog of VTI exists, the backlog is managed to assure that those documents determined to have direct impact on the current plant activities are given the highest priority for evaluation and are evaluated in time to support plant operations and maintenance. The backlog has been reducing over time and is expected to be significantly reduced over the next year during the non-outage periods.

   This statement of the allegation is unfounded.

4. **Statement:** "The only vendor information being evaluated is if the information is contained in design change packages."

**Findings:** There are other means for evaluating VTI. These include:

- The most critical information on product maintenance, installation or testing activities is brought to SCE's attention by NSSS supplier nuclear information networks, 10 CFR 21 reports, NRC Bulletins/Information Notices, INPO reporting networks or other direct communications with the suppliers by our technical or work planning organizations. Information from these sources is promptly analyzed and required action identified.

- In addition to the evaluations processes noted above SCE has a process to periodically query vendors, independent of the design change process and the normal means for the receipt of VTI. As a result of the first biannual effort to contact vendors, about 400 out of about 1200 vendor documents received are presently awaiting screening for determination of whether the document meets the definition of VTI and is not a duplicate of information already included within the VTIS.

  The backlog is managed to assure that those documents associated with safety related equipment are given the highest priority for screening and action. The backlog has been reducing over time and is expected to be significantly reduced over the next year during the non-outage periods.

This statement of the allegation is unfounded.

**Other Findings:**

Additionally, the work planning system used for plant maintenance and construction activities requires that an

individual work plan be developed using approved plant procedures and available VTI before operating equipment or performing maintenance.

No significant impact on plant activities due to the presence of the backlogs noted above is considered to exist.

SCE is implementing improved processes for maintenance of VTI. Implementation of these improvements is in process and will continue in 1994 and beyond.

In order to assure proper functioning of these programs, the Nuclear Oversight Division performs periodic audits and/or assessments. An audit/assessment of these programs was included in the 1994 audit plan and will be performed later in the year. The audit/assessment will address the effectiveness of the current processes, the impact or the process changes planned, and will review the status of any backlog. The results of this audit/assessment will be discussed with SCE management and corrective actions will be followed to completion.

Conclusion:

The allegation is unfounded. As described above, SONGS has a effective program for the utilization of VTI. This program is being managed such that needed evaluations are completed in a timely manner.