

## NOTICE OF VIOLATION

Southern California Edison  
San Onofre Nuclear Generating Station

Docket Nos. 50-361; 50-362  
License Nos. NPF-10; NPF-15  
EA 96-466

During an NRC inspection conducted on October 20 through November 15, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50.65(a)(1) states, in part, that each holder of an operating license . . . shall monitor the performance or condition of structures, systems, or components (SSCs) against licensee-established goals . . . and that such goals shall be established commensurate with safety.

10 CFR 50.65(a)(2) states, in part, that monitoring under (a)(1) is not required where it has been demonstrated that the performance or condition of an SSC is being effectively controlled through the performance of appropriate preventive maintenance such that the SSC remains capable of performing its intended function. Paragraph (c) states that "[t]he requirements of this section shall be implemented by each licensee no later than July 10, 1996."

San Onofre Nuclear Generating Station Procedure SO123-XIV-5.3, "Maintenance Rule Program Implementation," Revision 0, Temporary Change Notice 0-3, Section 6.3.3, implements, in part, the requirements of (a)(2) above. Section 6.3.3 states, in part, that for nonrisk-significant SSCs the plant level performance criteria will be unplanned automatic reactor scrams, unplanned capability loss factor, unplanned safety system actuation, unplanned shutdown safety functional events, abnormal radiological releases, and core damage frequency.

Contrary to the above, since September 20, 1996, the licensee failed to adequately monitor the performance of the Common Control Room Complex Smoke Exhaust Dampers in that none of the performance criteria designated in Procedure SO123-XIV-5.3 were adequate to demonstrate that the dampers' performance was effectively controlled through appropriate preventive maintenance. (01014)

This is a Severity Level IV violation (Supplement I).  
(50-361/9614-02;50-362/9614-02)

- B. 10 CFR 50.65(a)(1) states, in part, that each holder of an operating license . . . shall monitor the performance or condition of SSCs against licensee-established goals . . . and that such goals shall be established commensurate with safety.

10 CFR 50.65(a)(2) states, in part, that monitoring under (a)(1) is not required where it has been demonstrated that the performance or condition of a SSC is being effectively controlled through the performance of appropriate preventive maintenance such that the SSC remains capable of performing its intended safety

function. Paragraph (c) states that "[t]he requirements of this section shall be implemented by each licensee no later than July 10, 1996."

Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 1, endorses NUMARC 93-01, "Industry Guidelines for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 0, as an acceptable method for implementing the requirements of 10 CFR 50.65. Regulatory Guide 1.160 states that the methods described in the guide will be used in the evaluation of the effectiveness of maintenance activities of licensees who are required to comply with 10 CFR 50.65 unless a licensee has proposed an acceptable alternative method of compliance.

NUMARC 93-01, Section 9.3.2, states, in part, that performance criteria for evaluating SSCs are necessary to identify the standard against which performance is to be measured. Criteria are established to provide a basis for determining satisfactory performance. . . (for SSCs monitored under (a)(2)). Additionally, Section 9.3.2 states that performance criteria for risk significant SSCs be established to assure that reliability and availability assumptions used in the plant-specific probabilistic risk assessment, individual plant examination, or other risk determining analysis are maintained or adjusted when necessary.

Contrary to 10 CFR 50.65(a)(2), as of October 22, 1996, the licensee, in choosing the NUMARC approach, failed to demonstrate that the performance or condition of SSCs was effectively controlled through the performance of appropriate preventive maintenance in that the licensee did not demonstrate that the performance criteria used to monitor reliability would ensure that the SSCs remained capable of performing their intended safety function. Specifically, in accordance with NUMARC 93-01, for those risk-significant SSCs within the scope of 10 CFR 50.65, the licensee established performance criteria to monitor reliability that neither considered, nor were bounded by, the safety significance defined by the licensee's plant-specific probabilistic risk assessment, individual plant examination, or other risk determining analysis for those SSCs. The licensee had not proposed an acceptable alternative to demonstrate compliance with 10 CFR 50.65(a)(2). (02014)

This is a Severity Level IV violation (Supplement I).  
(50-361/9614-04;50-362/9614-04)

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison (Licensee) is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violations, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the

results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas  
this 3rd day of March 1997