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March 25, 1988

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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, Mr. R. P. Zimmerman (NRC) to Mr. Kenneth P. Baskin (SCE), dated February 26, 1988

The reference forwarded a Notice of Violation resulting from the routine inspection conducted by Messrs. F. R. Huey, J. E. Tatum and A. L. Hon from November 22, 1987, through January 20, 1988, which was documented in the NRC Inspection Report Nos. 50-361/87-31 and 50-362/87-31. In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the subject Notice of Violation.

If you have any questions or require further information, please so advise.

Very truly yours,

Kenneth P Baskin

Enclosure

cc: Mr. J. B. Martin (USNRC Regional Administrator, Region V)
Mr. F. R. Huey (USNRC Senior Resident Inspector)

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ENCLOSURE

REPLY TO A NOTICE OF VIOLATION

The enclosure to Mr. D. F. Kirsch's letter, dated February 10, 1988, states in part:

"10 CFR 50.73(a)(1) states in part:

> "The holder of an operating license for a nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 30 days after the discovery of the event."

"10 CFR 50.73(a)(2) states that the licensee shall report any operation or condition prohibited by the plant's Technical Specification.

"Contrary to the above requirements, the licensee did not report the following conditions:

"1. In February 1987, the licensee identified that the Unit 2 steam generator code safety valves had been improperly adjusted in March 1986, during the Cycle III refueling outage. During this period, the unit operated in a condition prohibited by Technical Specification Limiting Condition for Operation (L.C.O.) 3.7.1.1 in that 14 safety valves failed to satisfy the operability requirements of the Technical Specifications.

"2. In March 1987, the licensee identified that the Unit 3 steam generator code safety valves had been improperly adjusted in September, 1985, during the Cycle II refueling outage. During this period, the unit operated in a condition prohibited by Technical Specification L.C.O. 3.7.1.1, in that 15 safety valves failed to satisfy the operability requirements of the Technical Specifications.

"This is a Severity Level IV violation (Supplement I)."

RESPONSE

REASONS FOR THE VIOLATION

In January 1987, during routine surveillance testing of Main Steam Safety Valves (MSSVs), a vendor conducted a lift pressure verification test on a Unit 3 MSSV to demonstrate a new testing device. The vendor's test results were different than those obtained using SCE equipment. Efforts were begun to resolve the differences in the test results. The review's initial indications were that the data that SCE had taken from vendor drawings to use in the calculational methodology for verification of the MSSV setpoints, differed from actual conditions. This conclusion was subsequently confirmed.

At approximately the same time the review's initial conclusions were reached, Unit 2 entered an unplanned outage. MSSV testing and setpoint resetting commenced, using corrected data to establish MSSV setpoints. In the course of this evolution, the as-found setpoints of two MSSVs were found to be outside limits set forth in the Technical Specifications. This condition was initially evaluated for reportability and documented in a Reportability Disposition Sheet (RDS), the system by which SCE documents certain evaluations requiring reportability considerations. Using the information then available, it was assumed that the MSSVs setpoints had failed when found. Based upon this data and the guidance provided in NUREG-1022 regarding compelling evidence in component failures, the RDS concluded the condition to not be reportable. At the time the initial reportability determination was being made, studies were still underway by Station Technical to verify earlier MSSV setpoints, by calculating documented as-found setpoints using the corrected procedural method. It was intended that, at the conclusion of this review, another reportability determination would be conducted.

Subsequent examination of the events of this period indicate that the Station Technical staff, who conducted the historical review of earlier MSSV setpoints, were not fully cognizant of the fact that the results of this review were intended to be used in a subsequent reportability determination. Communication of the results of the MSSV setpoint analysis was not, therefore, adequately effected in a timely fashion. Management failure to follow up resulted in a lack of adequate and timely resolution on this issue. As a consequence, the intended second reportability determination was not carried out until January, 1988, when inquiries from the NRC resident inspectors prompted the revisiting of the event.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Licensee Event Report (LER) 85-61 (Docket No. 50-361) was submitted on February 17, 1988, reporting the facts and circumstances involved in the issue of the MSSV setpoints.

In order to ensure management cognizance of reportability evaluations, the approval cycle for Reportability Disposition Sheets has been revised to include the Station Manager.

This event and the importance of proper follow-up and tracking of ongoing evaluations required for reportability determinations has been reviewed with appropriate Compliance personnel.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A procedure is currently under development to formalize the present process for preparing LERs. This procedure will formalize the requirement for the Station Manager to review Reportability Disposition Sheets. Forecast date for implementation of the procedure is April 30, 1988.

In addition, when assignments are made for completion of a Reportability Disposition Sheet, completion of the assignments will be tracked via existing formalized systems.

In order to improve the overall performance of the Compliance group, by July 31, 1988, current guidance associated with the reportability determination process will be expanded and augmented to provide unambiguous (to the extent possible) directions in evaluating NRC reportability requirements. Following development, this detailed guidance will be reviewed with Compliance personnel responsible for making reportability determinations.

This incident will be reviewed with all Station Technical (i.e., engineering) management and supervision to emphasize the importance of communicating the basis of assignments, which are made for purposes of making reportability determinations.

Lastly, the training which is given to appropriate Station Technical management and supervision regarding NRC reportability requirements will be reevaluated and enhanced as necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on February 17,1988, when Licensee Event Report 85-061 (Docket No. 50-361) was submitted on the Main Steam Safety Valve setpoints being outside the Technical Specification Limits.