



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

May 5, 1997

Harold B. Ray, Executive Vice President
Southern California Edison Co.
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: NRC INSPECTION REPORT 50-361/97-02; 50-362/97-02

Thank you for your letter of April 14, 1997, in response to our letter and Notice of Violation dated March 13, 1997. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Your letter provides your position, for the second violation, that the steam generator system was out of service for testing and that the procedural noncompliance could not have had any safety significance. You also stated your confidence that your subsequent review of test data would have identified the error prior to returning the system to operation. We accept that there was minimal safety significance to the violation; but do not agree that there was not any safety significance associated with the procedure violation, because we do not consider holding pressure for only 1 minute to be equivalent to the testing procedure provision that 5 minutes of pressure application was necessary. Accordingly, we consider that departure from your established standard, without prior approval, had some safety significance. We also do not share your confidence that the error would have been identified prior to returning the steam generator to operation. We observed that your procedures did not require the review and acceptance of test data prior to returning the steam generator system to service, because your procedure data table did not provide specific acceptance criteria for the test data entered in the "leak test elapsed time" block.

If you have further questions regarding our positions, please contact Dennis Kirsch (510-975-0290) of my staff.

Sincerely,

Thomas P. Gwynn, Director
Division of Reactor Projects

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PDR ADOCK 05000361
G PDR



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Docket Nos.: 50-361

50-362

License Nos.: NPF-10

NPF-15

cc:

Chairman, Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 335
San Diego, California 92101

Alan R. Watts, Esq.
Woodruff, Spradlin & Smart
701 S. Parker St. Suite 7000
Orange, California 92868-4720

Sherwin Harris, Resource Project Manager
Public Utilities Department
City of Riverside
3900 Main Street
Riverside, California 92522

R. W. Krieger, Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

Dr. Harvey Collins, Chief
Division of Drinking Water and
Environmental Management
California Department of Health Services
P.O. Box 942732
Sacramento, California 94234-7320

Terry Winter, Manager
Power Operations
San Diego Gas & Electric Company
P.O. Box 1831
San Diego, California 92112

Mr. Steve Hsu
Radiological Health Branch
State Department of Health Services
P.O. Box 942732
Sacramento, California 94234

Southern California Edison Co.

-3-

Mayor
City of San Clemente
100 Avenida Presidio
San Clemente, California 92672

Mr. Truman Burns\Mr. Robert Kinosian
California Public Utilities Commission
505 Van Ness, Rm. 4102
San Francisco, California 94102

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