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**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064**

December 20, 2001

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 50-361/01-19; 50-362/01-19**

Dear Mr. Ray:

On August 24, 2001, the NRC completed a physical security inspection at your San Onofre Nuclear Generating Station, Units 2 and 3. The enclosed report documents the inspection findings which were discussed on August 24, 2001, with Mr. D. Nunn and other members of your staff.

This inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspector reviewed selected procedures and records, observed activities, and interviewed personnel.

This report documents one finding of very low safety significance (Green). The finding was determined to be both a Green finding and a Severity Level IV violation of NRC requirements. A second issue was determined to be a Severity Level IV violation of NRC requirements. However, because of the very low safety significance and because both violations were entered into your corrective action program, the NRC is treating the two violations as non-cited violations (NCVs), consistent with Section VI.A.1 of the Enforcement Policy. The two issues are described in the subject inspection report. If you contest any of these non-cited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011; the Director, Office of Enforcement,

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U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the San Onofre Nuclear Generating Station, Units 2 and 3 facility.

The material enclosed herewith contains Safeguards Information as defined by 10 CFR 73.21 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended. Therefore, the enclosure will not be placed in the Public Document Room.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and your response will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

**/RA/**

Gail M. Good, Chief  
Plant Support Branch  
Division of Reactor Safety

Dockets: 50-361  
50-362  
Licenses: NPF-10  
NPF-15

Enclosure:  
NRC Inspection Report  
50-361/01-19; 50-362/01-19

cc **without SAFEGUARDS portion of report:**  
Chairman, Board of Supervisors  
County of San Diego  
1600 Pacific Highway, Room 335  
San Diego, California 92101

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**HARD COPY of entire SAFEGUARDS report:**

Alan Madison (NRR/DIPM/IIPB)(MS 7 H15)  
 Elaine McNeil (NRR/DIPM/OLB/IRSS)(MS: 6H2)  
 RIV Docket File - File Room Custodian  
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**ENCLOSURE**

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket(s): 50-361  
50-362

License(s): NPF-10  
NPF-15

Report No.: 50-361/01-19  
50-362/01-19

Licensee: Southern California Edison Co.

Facility: San Onofre Nuclear Generating Station, Units 2 and 3

Location: 5000 S. Pacific Coast Hwy.  
San Clemente, California

Dates: August 20-24, 2001

Inspector: A. Bruce Earnest, Senior Physical Security Inspector  
Plant Support Branch

Approved By: Gail M. Good, Chief  
Plant Support Branch

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### SUMMARY OF FINDINGS

San Onofre Nuclear Generating Station, Units 2 and 3, NRC Inspection Report 50-361/01-19; 50-362/01-19 on August 20-24, 2001. The inspection included reviews of access authorization, fitness for duty, access control, security plan changes, performance indicator verification, and other previously identified issues.

The inspection was conducted by a region-based physical security inspector. The inspection identified one Green finding. The Green finding was both a Severity Level IV violation of NRC requirements and a Green finding. A second issue was determined to be a Severity Level IV violation of NRC requirements. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using IMC 0609 "Significance Determination Process" (SDP). Findings for which the SDP does not apply are indicated by "no Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process web site at <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

#### **Cornerstone: Physical Protection**

- Green. The inspector identified a non-cited Severity Level IV violation, which also had very low safety significance, involving a decrease in the effectiveness of the training and qualification and contingency plans in violation of 10 CFR 50.54(p). During a review of Revision 22 to the licensee Training and Qualifications Plan, dated September 29, 2000, and Revision 24 to the Safeguards Contingency Plan, dated August 29, 2000, the inspector determined that one change to both plans was a reduction in plan effectiveness. The previously approved plans committed to batons and corresponding training in support of contingency plan requirements for response to riots and civil disturbances; however, the changes to the plans removed the requirements to have batons and training without substituting equivalent equipment to support the contingency plan requirement. This violation is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as AR 001001889.

The safety significance of this finding was determined to be very low by the Physical Protection Significance Determination Process, because there were less than two similar findings in the last four quarters. The issue represented a credible impact on safety because the failure to provide equipment necessary to support the requirements of the Safeguards Contingency Plan could result in unauthorized access to the protected area. In addition, the reduction in plan effectiveness was a violation of 10 CFR 50.54(p). Further, a 10 CFR 50.54(p) plan change that decreased plan effectiveness impeded the

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regulatory process because it prevented the NRC from reviewing the matter prior to implementation.

- A non-cited Severity Level IV violation was identified for failure to provide accurate information to the NRC in accordance with the requirements of 10 CFR 50.9. The licensee submitted a “white paper” to the NRC on October 17, 2000, to provide information to dispute the issue involving the 10 CFR 50.54(p) change associated with the use of the batons. A portion of that document stated that, “Based on agreements with the FBI, it was determined the FBI was better equipped/trained to handle public disturbances at the site.” Based on subsequent inspection, the NRC determined that the FBI was not better equipped/trained to handle public disturbances. The failure to provide accurate information to the NRC impeded the regulatory process in that the NRC could have incorrectly approved the plan change based on the information presented in the “white paper.” This Severity Level IV violation is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This Severity Level IV violation is in the licensee’s corrective action program as AR 010101660-08.

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Licensee

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S. Blue, Supervisor, Fitness for Duty  
G. Broussard, Supervisor, Security Operations  
G. Cook, Supervisor, Compliance  
J. Fee, Manager, Maintenance  
M. Flannery, Manager, Access Authorization  
W. Frick, Manager, Nuclear Safety Concerns  
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NRC

G. Good, Chief, Plant Support Branch, Region IV  
C. Osterholtz, Senior Resident inspector

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

50-361; -362/0119-02	NCV	Reduction in Security Plan Effectiveness
50-361; -362/0119-03	NCV	Inaccurate Information Submitted to NRC

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Closed

50-361; -362/0014-04	URI	Potential Reduction in Security Plan Effectiveness
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Opened

50-361; -362/0119-01	URI	Potential Access Control Vulnerability
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Discussed

None