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

October 19, 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 INTEGRATED INSPECTION REPORT 50-361/01-11; 50-362/01-11

Dear Mr. Ray:

On August 5 through September 22, 2001, the NRC conducted an inspection at your San Onofre Nuclear Generating Station, Units 2 and 3, facility. The enclosed report documents the inspection findings which were discussed on August 31, September 13, and September 25, 2001, with Mr. Dwight Nunn, Mr. Russ Krieger, 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. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Since September 11, 2001, San Onofre Nuclear Generating Station has assumed a heightened level of security based on a series of threat advisories issued by the NRC. Although the NRC is not aware of any specific threat against nuclear facilities, the heightened level of security was recommended for all nuclear power plants and is being maintained due to the uncertainty about the possibility of additional terrorist attacks. The steps recommended by the NRC include increased patrols, augmented security forces and capabilities, additional security posts, heightened coordination with local law enforcement and military authorities, and limited access of personnel and vehicles to the site.

The NRC continues to interact with the Intelligence Community and to communicate information to Southern California Edison Co. In addition, the NRC has monitored maintenance and other activities which could relate to the site's security posture.

Circumstances affecting the financial viability of Southern California Edison Co. have continued to evolve during this inspection period. Actions have been initiated by the state of California and Southern California Edison Co. to address the impacts of these financial challenges. The NRC has exercised communications channels to better understand your planned and implemented actions, especially as they relate to your responsibility to safely operate the San Onofre reactors. NRC inspections, to date, have confirmed that you continue to operate these reactors safely and ensure the health and safety of the public.

In response to these conditions of economic stress, the Region continues the 6-week periodicity of its integrated inspection reports and describes the scope of the individual inspection activities in greater detail. This is being done to keep the public more fully informed of the breadth and depth of the NRC's inspection and oversight activities.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, 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 Web site 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/

Kriss M. Kennedy, Chief
Projects Branch C
Division of Reactor Projects

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

Enclosure:
NRC Inspection Report
50-361/01-11; 50-362/01-11

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Dockets:	50-361 50-362
Licenses:	NPF-10 NPF-15
Report:	50-361/01-11 50-362/01-11
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 5 through September 22, 2001
Inspectors:	C. C. Osterholtz, Senior Resident Inspector J. G. Kramer, Resident Inspector P. J. Elkmann, Emergency Preparedness Inspector W. A. Maier, Senior Emergency Preparedness Inspector L. T. Ricketson, Senior Health Physicist M. P. Shannon, Senior Health Physicist
Approved By:	K. M. Kennedy, Chief, Project Branch C

SUMMARY OF FINDINGS

San Onofre Nuclear Generating Station, Units 2 and 3
NRC Inspection Report 50-361/01-11; 50-362/01-11

IR05000361-01-11, IR05000362-01-11: 08/05-09/22/2001; Southern California Edison; San Onofre Nuclear Generating Station, Units 2 & 3; Integrated Resident and Regional Report.

The inspection was conducted by resident inspectors and regional reactor inspectors. Based on the results of the inspection, no findings of significance were identified.

Report Details

Summary of Plant Status:

Unit 2 operated at approximately 98.5 percent power throughout this inspection period. Unit 3 operated at approximately 98.5 percent power at the beginning of this inspection period. On August 16, 2001, Unit 3 power was increased to approximately 100 percent as part of the NRC-approved power uprate and remained at approximately 100 percent power throughout the rest of this inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness

1R04 Equipment Alignments (71111.04)

a. Inspection Scope

The inspectors performed a partial walkdown of the Unit 2 Train B emergency core cooling system to confirm its operability during an outage of refueling water tank outlet Valve 2HV9300 and the Train A emergency core cooling system. The inspectors used control board and local position indications to verify that portions of the Train B system were consistent with system piping and instrumentation drawings.

The inspectors performed a partial walkdown of Unit 2 Emergency Diesel Generator 2G002 to confirm its operability following a surveillance test of Unit 2 Emergency Diesel Generator 2G003. The inspectors referenced Procedures SO123-0-42, "Cumulative Equipment Hours, Inoperability and Design Cycles," Revision 6, and S023-3.23, "Diesel Generator Operation," Revision 19. The inspectors also used local position indications to verify that existing conditions were consistent with system piping and instrument drawings.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Routine Fire Inspection Tours - Units 2 and 3

a. Inspection Scope

The inspectors performed routine fire inspection tours, and reviewed relevant records, for the following plant areas important to reactor safety:

- Auxiliary feedwater pump room (Unit 2)
- Auxiliary feedwater pump room (Unit 3)
- Diesel Generator 2G002 room (Unit 2)

The inspectors observed the material condition of plant fire protection equipment, the control of transient combustibles, and the operational status of barriers. The inspectors compared in-plant observations with the commitments in the pertinent portions of the Updated Fire Hazards Analysis Report.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification (71111.11)

a. Inspection Scope

The inspectors reviewed licensed operator requalification training activities, including the licensed operators' performance and evaluators' critique, and compared operator performance in the simulator with performance in the control room.

The training activities placed an emphasis on high-risk licensed operator actions, operator activities associated with the emergency plan, and previous lessons learned items. These items were evaluated to ensure that operator performance was consistent with protection of the reactor core during postulated accidents.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed the implementation of the requirements of the Maintenance Rule to verify that the licensee had conducted appropriate evaluations of functional failures and maintenance preventable functional failures of equipment. The inspectors reviewed root causes and corrective action determinations for equipment failures and reviewed performance goals for ensuring corrective action effectiveness. The inspectors discussed the functional failures with the reliability engineering supervisor and the system cognizant engineers. In addition, the inspectors reviewed Action Requests (ARs) 980100940, 001001593, 001102003, 001102004, and 010102354. The following systems were reviewed:

- Component cooling water (Unit 2)
- Pump room emergency cooling (Unit 2)
- Saltwater pump room ventilation and cooling (Unit 2)
- Control room complex dampers (Units 2 and 3)

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed the effectiveness of risk assessment and risk management for Unit 2 Train A component cooling water Heat Exchanger 2ME001 and Train B Charging Pump 2MP192. The inspectors discussed the associated risk analysis and component restoration with the shift technical advisor.

The inspectors reviewed the risk assessment and emergent work associated with failure of Unit 2 Steam Generator 2E089 auxiliary feedwater Isolation Valve 2HV4715 to close during subgroup relay testing. The inspectors discussed the failure and reviewed electrical wiring diagrams with the shift manager. The inspectors reviewed AR 010900371 and Maintenance Order (MO) 01090444000.

The inspectors reviewed the risk assessment and contingency plan associated with a small steam leak on Unit 3 turbine-driven auxiliary feedwater pump steam supply Throttle Valve 2HV4716. The inspectors reviewed ARs 010800620 and 010800440 and the 10 CFR 50.59 screening and discussed the contingency plan with licensee personnel.

The inspectors verified the accuracy and completeness of assessment documents and that the licensee's program was being appropriately implemented. The inspectors also ensured that plant personnel were aware of the appropriate licensee-established risk category, according to the risk assessment results and licensee program procedures.

b. Findings

No findings of significance were identified.

1R14 Personnel Performance During Nonroutine Plant Evolutions (71111.14)

a. Inspection Scope

The inspectors reviewed the performance of Unit 3 Operations personnel in establishing an NRC approved power uprate of approximately 1.4 percent. The inspectors attended a prejob briefing on the evolution and reviewed AR 010800794 as part of the inspection.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

. a. Inspection Scope

The inspectors reviewed the operability evaluations documented in the following ARs to ensure that each operability was properly justified:

- Unit 3 main steam atmospheric dump Valve 3HV8421 backup nitrogen supply pressure below Technical Specification minimum (AR 010800772). In addition to the cause assessment contained in the AR, the inspectors reviewed Technical Specification Requirement and Basis 3.7.4, "Atmospheric Dump Valves."

- Unit 2 charging pump suction valve from refueling water Storage Tank 2LV0227C handswitch did not operate as an operator expected (AR 0100900890). In addition to the cause assessment contained in the AR, the inspectors reviewed wiring diagrams of the system and discussed the operability of the switch with Engineering personnel.

b. Findings

No findings of significance were identified.

1R16 Operator Workarounds (71111.16)

a. Inspection Scope

The inspectors reviewed operator workarounds to evaluate their cumulative effect on the operators' ability to implement abnormal or emergency procedures. The inspection included a review of criteria and processes used for identifying and tracking deficiencies as operator workarounds. The review also focused on the length of time the identified workarounds had been in existence and efforts initiated to resolve them.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

Upon the licensee's completion of repairs to engineered safety features subgroup Relay K-402B (Unit 2), the inspectors reviewed the postmaintenance testing to verify that the test procedures and activities adequately demonstrated system operability. The inspectors reviewed AR 010900371, MO 01090444000, and Procedure SO23-3-3.43.35, "ESF Subgroup Relays K-402B, K-624B, and K-724B Semiannual Test," Revision 2.

Upon completion of scheduled motor-operated valve testing on refueling water storage tank outlet to charging pump Suction Valve 2LV0227C (Unit 2), the inspectors reviewed postmaintenance testing to verify that the test procedures and activities adequately demonstrated system operability. The inspectors reviewed ARs 010900890 and 010900970, and MOs 01030771000 and 01050898000 as part of the review.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors observed and/or reviewed documentation for the following surveillance tests to verify that the structures, systems, and components were capable of performing their intended safety functions and to assess their operational readiness:

- Emergency Diesel Generators 2G002 and 2G003 monthly surveillance tests (Unit 2). The inspectors reviewed Surveillance Procedure S023-3.23, "Diesel Generator Operation," Revision 19, and discussed performance of the tests with operations management. The inspectors also reviewed AR's 010800359, 010800934, 010800954, and 010801166 to determine if any potential generic human performance weaknesses existed between these surveillance tests and other recently performed surveillances.

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed Temporary Facility Modification 2-01-GNJ-001 associated with control element drive mechanism Standby Cooling Unit 2E404 Supply Fan 2ME404A isolation and removal from service on Unit 2. In addition, the inspectors reviewed AR 010700904 and its associated 10 CFR 50.59 safety screening.

b. Findings

No findings of significance were identified.

1EP1 Exercise Evaluation (71114.01)

a. Inspection Scope

The inspectors reviewed the objectives and scenario for the 2001 biennial emergency plan exercise to determine if the exercise would acceptably test major elements of the emergency plan. The scenario simulated failures of fission product barrier failures and a radiological release to the environment to demonstrate the licensee's capabilities to implement the emergency plan. The exercise was not conducted because of the national emergency condition.

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes (71114.04)

a. Inspection Scope

The inspectors reviewed Revision 15 to Procedure SO123-VIII-1, “Recognition and Classification of Emergencies,” against 10 CFR 50.54(q) to determine if the revision decreased the effectiveness of the plan.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control to Radiologically Significant Areas (71121.01)

a. Inspection Scope

The inspectors interviewed radiation workers and radiation protection personnel involved in high dose rate and high exposure jobs during routine operations. The inspectors also conducted plant walkdowns within the radiologically controlled area and conducted independent radiation surveys of selected work areas. The following items were reviewed and compared with regulatory requirements:

- Area posting and other controls for airborne radioactivity areas, radiation areas, high radiation areas, and very high radiation areas
- Radiation exposure permits and radiological surveys involving airborne radioactivity areas, high radiation areas, and electronic dosimeter alarm setpoints
- Access controls, surveys, and radiation exposure permits for the following four significant high dose work areas from Unit 3's Refueling Outage 11: Vibration Loose Parts Monitor Work (Radiation Exposure Permit 200130), Blind Flange Work (Radiation Exposure Permit 200129), Steam Generator Eddy Current Work (Radiation Exposure Permit 200171), and Installation of Nozzle Dams (Radiation Exposure Permit 200173)
- Radiation protection program procedures
- Dosimetry placement when work involved a significant dose gradient
- High radiation area key control program
- Controls involved when handling highly radioactive items

- A summary of corrective action documents written since December 1, 2000, that involved high radiation area and work practice incidents (17 corrective action reports were reviewed in detail: AR 000900120, AR 001102029, AR 001200058, AR 001200304, AR 001200575, AR 001200935, AR 001201076, AR 010100734, AR 010101049, AR 010101053, AR 010101388, AR 010200033, AR 010200305, AR 010200630, AR 010300339, AR 010301308, and AR 010700802)

- Health Physics Division self-assessments for the fourth quarter 2000, first quarter 2001, and second quarter 2001

b. Findings

No findings of significance were identified.

2OS2 ALARA Planning and Controls (71121.02)

a. Inspection Scope

The inspectors interviewed radiation workers and radiation protection personnel. Independent radiation surveys of selected work areas within the radiologically controlled area were conducted. No high exposure job or work in high radiation areas was performed during the inspection. The following items were reviewed and compared with regulatory requirements:

- ALARA program procedures

- Processes used to estimate and track exposures

- Plant collective exposure history for the past 3 years, current exposure trends, and 3-year rolling average dose information

- Use of engineering controls to achieve dose reductions

- Hot spot tracking and reduction program

- Plant related source term data, including source term control strategy

- Radiological work planning for pressurizer spray isolation valve work conducted during the forced outage

- Postjob reviews for refueling and snubber work conducted during the Unit 3 Cycle 11 refueling outage

- Selected ARs initiated since the last inspection in this area (010100784, 010101458, 010201011, 010201065, 010300475, and 010300549)

- ALARA Committee meeting minutes and presentations for June 18, 2001

- Self-assessments and Leadership Observations conducted between March 12 and August 27, 2001
- Unit 3 Cycle 11 Refueling Outage ALARA Report
- Unit 3 Forced Outage ALARA Report (August 15, 2001)
- Declared pregnant worker dose monitoring controls

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Drill and Exercise Performance

a. Inspection Scope

The inspector reviewed the following documents related to the drill and exercise performance indicator in order to verify the licensee's reported data:

- Drill schedules for calendar years 2000 and 2001
- Drill scenarios
- Drill evaluation worksheets and records
- Drill evaluation reports
- Performance indicator reports

b. Findings

No findings of significance were identified.

.2 Emergency Response Organization Drill Participation

a. Inspection Scope

The inspector reviewed the following records related to emergency response organization participation in order to verify the licensee's reported data:

- Emergency response organization rosters for the third and fourth quarters of calendar year 2000 and rosters for the first and second quarters of calendar year 2001
- List of key emergency response organization positions
- Drill participation dates for emergency response organization members

- Drill attendance forms for a sample of four emergency responders
- Qualification records for a sample of four emergency responders
- Performance indicator reports

b. Findings

No findings of significance were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspector reviewed siren testing records for third and fourth quarters of calendar year 2000 and for the first and second quarters of calendar year 2001 to verify the accuracy of data reported for this performance indicator.

b. Findings

No findings of significance were identified.

.4 Occupational Exposure Control Effectiveness

a. Inspection Scope

The inspectors reviewed corrective action program records for Technical Specification-required locked high radiation areas, very high radiation areas, and unplanned exposure occurrences since December 2000 to confirm that these occurrences were properly recorded as performance indicators. Radiologically controlled area entries with exposures greater than 100 millirem were reviewed and selected examples were examined to determine whether or not they were within the dose projections of the governing radiation exposure permits. Internal dose estimates were reviewed if the radiation worker received a committed effective dose equivalent of more than 100 millirem.

b. Findings

No findings of significance were identified

.5 Radiological Effluent Technical Specification/Offsite Dose Calculation Manual Radiological Effluent Occurrences

a. Inspection Scope

The inspectors reviewed radiological effluent release program corrective action records, licensee event reports, and annual effluent release reports documented since December 2000 to determine if any events exceeded the performance indicator thresholds.

b. Findings

No findings of significance were identified.

.6 Plant Transients

a. Inspection Scope

The inspectors verified the accuracy of data reported by the licensee for the following performance indicators to ensure that the performance indicator color was correct for both Units 2 and 3:

- MS1 Emergency ac Power System Unavailability
- IE1 Unplanned Scrams
- IE3 Unplanned Power Changes per 7000 Critical Hours

The inspectors reviewed performance indicator data for the last two quarters of 2000 and the first two quarters of 2001. The inspectors reviewed NUREG-1022, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Revision 2, and NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0. Additionally, the inspectors discussed the status of the performance indicators and the compilation of data with engineering personnel.

b. Findings

No findings of significance were identified.

4OA5 Other

Financial Status

The NRC has exercised communications channels to better understand the licensee's planned and implemented actions, especially as they relate to safely operating the reactors. The inspectors have specifically reviewed the following on a weekly basis:

- Staffing of on-shift operating personnel
- Corrective maintenance backlog
- Corrective action Level 1 backlog
- Reduction in safety or risk important outage activities

- Reduction in planned risk important modifications or enhancements
- Emergency Response Facility and siren availability
- Generator voltage loading
- Impact of rolling blackouts on the grid and offsite power availability
- Employee morale

NRC inspections and inspector observations, to date, have confirmed that the licensee operated the units safely and that public health and safety was, thus far, assured.

4OA6 Meetings

.1 Exit Meeting Summary

The inspectors presented the inspection results to Mr. D. Nunn, Mr. R. Krieger, and other members of licensee management at an exit meetings on August 31 and September 12, 13, and 21, 2001. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether or not any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

40A7 Licensee Identified Violations

The following finding of very low significance was identified by the licensee and is a violation of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as a noncited violation (NCV).

NCV Tracking Number	Requirement Licensee Failed to Meet
362/2001011-01	10 CFR 20.1902 requires an area with radiation levels greater than 5 millirem per hour, but less than or equal to 100 millirem per hour, to be posted as a radiation area. On February 1, 2001, the licensee identified that a flatbed trailer with radiation levels as high as 60 millirem per hour on contact and 10 millirem per hour at 30 centimeters was not posted as a radiation area. This event is described in the licensee's corrective action program, reference AR 010200033. This is being treated as a noncited violation. The safety significance of this finding was determined to be very low by the Occupational Radiation Safety Significance Determination Process because there was no overexposure or substantial potential for an overexposure and the ability to assess dose was not compromised.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

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A. Scherer, Manager, Nuclear Oversight and Regulatory Affairs
M. Short, Manager, Site Technical Support
T. Vogt, Plant Superintendent, Units 2 and 3 Operations
R. Waldo, Manager, Operations

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed During this Inspection

362/2001011-01	NCV	Failure to post a radiation area (Section 4OA7)

Previous Items Closed

None

Previous Items Discussed

None

LIST OF ACRONYMS USED

AR	action request
CFR	Code of Federal Regulations
MO	maintenance order
NCV	noncited violation
NRC	Nuclear Regulatory Commission