

December 14, 2000

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: **Docket No. 50-361 and 50-362**
30-Day Report
Licensee Event Report No. 2000-015
San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

This submittal provides a 30-day Licensee Event Report (LER) in accordance with 10CFR50.73(a)(2)(i) for missed Technical Specification Surveillances. While this occurrence is applicable to both Units 2 and 3, a single report for Unit 2 is being submitted in accordance with NUREG-1022, Rev. 1. Neither the health nor the safety of plant personnel or the public was affected by this occurrence.

Any actions listed are intended to ensure continued compliance with existing commitments as discussed in applicable licensing documents; this LER contains no new commitments. If you require any additional information, please so advise.

Sincerely,



LER No. 2000-015

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3

IE22

NRC FORM 366 (MM-YYYY)				U.S. NUCLEAR REGULATORY COMMISSION				APPROVED BY OMB NO. 3150-0104 EXPIRES MM/DD/YYYY Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If a document used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.			
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="margin: 5px 0 0 40px;">(See reverse for required number of digits/characters for each block)</p>											
FACILITY NAME (1) San Onofre Nuclear Generation Station (SONGS) Unit 2					DOCKET NUMBER (2) <div style="text-align: center; font-weight: bold;">05000-361</div>		PAGE (3) <div style="text-align: center; font-weight: bold;">1 of 3</div>				
TITLE (4) Missed Technical Specification Surveillances on Post Accident Monitoring Instrumentation (PAMI) Containment Isolation Valves											
EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
11	17	2000	2000	- 015 -	00	12	14	2000	SONGS Unit 3	05000-362	
									FACILITY NAME	DOCKET NUMBER	
									SONGS Unit 3	05000-362	
									FACILITY NAME	DOCKET NUMBER	
OPERATING MODE (9)			1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)					
POWER LEVEL (10)			64			20.2201(b)		20.2203(a)(2)(v)		<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)
20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(ii)		50.73(a)(2)(x)			
20.2203(a)(2)(i)			20.2203(a)(3)(ii)			50.73(a)(2)(iii)		73.71			
20.2203(a)(2)(ii)			20.2203(a)(4)			50.73(a)(2)(iv)		OTHER			
20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A			
20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)					
LICENSEE CONTACT FOR THIS LER (12)											
NAME R. W. Krieger, Vice President, Nuclear Operations								TELEPHONE NUMBER (Include Area Code) 949-368-6255			
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE).						<input checked="" type="checkbox"/> NO					

At SONGS Units 2 and 3, Technical Specifications (TS) Surveillance Requirement (SR) 3.3.11.4 requires, in part, that SCE "perform CHANNEL CALIBRATION" every 18 months on Post Accident Monitoring Instrumentation (PAMI) containment isolation valves. On 11/17/2000, SCE discovered that the surveillance frequency of 18 month (plus 25 percent) was exceeded. SCE is providing this LER in accordance with 10CFR50.73(a)(2)(i).

SCE verified that the requirements of TS SR 3.3.11.4 had been met for all of the PAMI containment isolation valves. This was completed on 11/9/2000. SCE modified the IST procedure to credit the IST as performing a "CHANNEL CALIBRATION" in accordance with TS SR 3.3.11.4. In addition, SCE will modify the scheduling program for the PAMI containment isolation valves to 18 months.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

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San Onofre Nuclear Generating Station (SONGS) Unit 2	05000-361	2000	- 015 -	00	2 of 3

Plant: San Onofre Nuclear Generation Station (SONGS) Units 2 and 3
Discovery Date: November 17, 2000
Reactor Vendor: Combustion Engineering
Mode: Mode 1 – Power Operation
Power: 64 percent (at 1700 PDT)

Unit 2
Unit 3
Combustion Engineering
Mode 1 – Power Operation
100 percent

DESCRIPTION OF THE EVENT:

At San Onofre Nuclear Generating Station (SONGS), the Units 2 and 3 Technical Specifications (TS) Surveillance Requirement (SR) 3.3.11.4 requires, in part, that Southern California Edison (SCE) "perform CHANNEL CALIBRATION" every 18 months on Post Accident Monitoring Instrumentation (PAMI) [IP] containment isolation valves [ISV]. On November 17, 2000, SCE discovered that the surveillance frequency of 18 month (plus 25 percent) was exceeded. Thus, SCE is providing this LER in accordance with 10CFR50.73(a)(2)(i).

SCE has concluded that the procedure for Inservice Testing (IST) of the PAMI containment isolation valves could be credited for the "CHANNEL CALIBRATION" required by the TS; however, the testing was not performed within the TS required 18 month frequency. The lack of a specific surveillance procedure to perform the "CHANNEL CALIBRATION" for the Units 2 and 3 PAMI containment isolation valves (ARs 001100550 and 001100552) was discovered while responding to an industry question.

CAUSE OF THE EVENT:

In August 1996, TS SR 3.3.11.4 was added as a result of Improved Technical Specifications (TSIP). During the implementation of the TSIP SRs, SCE did not incorporate the new TS requirements in site SR procedures. The condition reported herein is a result of not capturing the PAMI containment isolation valve "CHANNEL CALIBRATION" from TS SR 3.3.11.4 in site surveillance procedures. This omission was caused by a personnel error (cognitive) on the part of the SCE's project management of the TSIP effort.

During the implementation of the TSIP SRs, SCE identified several reportable conditions pertaining to the new surveillance requirements (see LER 2-1997-001, Rev. 3, "Surveillances Not Current Upon Improved Technical Specification Implementation"). Corrective actions associated with the events reported in LER 2-1997-001 included a TS Self Assessment that reviewed each TS SR to verify that both the current surveillance procedure and the current test of record met, verbatim, the TS requirements. It appears that this review also did not capture the requisite "CHANNEL CALIBRATION" from TS SR 3.3.11.4 in site surveillance procedures.

CORRECTIVE ACTIONS:

SCE has performed the following corrective actions:

1. SCE verified that the requirements of TS SR 3.3.11.4 had been met for all of the PAMI containment isolation valves. This was completed on November 9, 2000 (after identification of the procedure omission, but before identification of the TS violation).
2. SCE modified the IST procedure to credit the IST as performing a "CHANNEL CALIBRATION" in accordance with TS SR 3.3.11.4.

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In addition, SCE will modify the scheduling program for the PAMI containment isolation valves to 18 months.

SAFETY SIGNIFICANCE:

Performance of the CHANNEL CALIBRATION every 24 months has been evaluated in a Technical Specification change submitted to the NRC on September 6, 2000. This evaluation concluded that changing the surveillance frequency from 18 months to 24 months (plus 25 percent) is acceptable. Therefore, the safety significance of this issue was minimal.

This issue was evaluated using NRC Manual Chapter 0610* (dated 10/6/00), and using the initial assessment of inspection observations for Significance Determination Process (SDP) entry (Attachment 0609.02), the issue would be a minor one without color.