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 FACIL:50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361
 AUTH.NAME AUTHOR AFFILIATION
 MORGAN,H.E. Southern California Edison Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 87-030-00:on 871127,delinquent collection & analysis of
 containment purge effluent samples discovered.

W/8 ltr.

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 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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INTERNAL:	ACRS MICHELSON		1	1		ACRS MOELLER		2	2
	AEOD/DOA		1	1		AEOD/DSP/NAS		1	1
	AEOD/DSP/ROAB		2	2		AEOD/DSP/TPAB		1	1
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	NRR/DLPQ/QAB		1	1		NRR/DOEA/EAB		1	1
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	REG FILE 02		1	1		RES DEPY GI		1	1
	RES TELFORD,J		1	1		RES/DE/EIB		1	1
	RGN5 FILE 01		1	1					
EXTERNAL:	EG&G GROH,M		5	5		FORD BLDG HOY,A		1	1
	H ST LOBBY WARD		1	1		LPDR		1	1
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2										DOCKET NUMBER (2) 0 5 0 0 0 3 6 1 1 OF 0 5				PAGE (3) 0 5		
TITLE (4) DELINQUENT COLLECTION AND ANALYSIS OF CONTAINMENT PURGE EFFLUENT SAMPLES																
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)						
MONTH	DAY	YEAR	YEAR	SEQ. NUMBER	REV. NUMBER	MONTH	DAY	YEAR	FACILITY NAMES				DOCKET NUMBER(S)			
1 1	2 7	8 7	8 7	0 3 0	0 0	1 2	3 1	8 7					0 5 0 0 0			
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)														
5		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)		
POWER LEVEL (10)		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)		
0 0 0		20.405(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
		20.405(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)						
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)						
		20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(x)						
LICENSEE CONTACT FOR THIS LER (12)																
NAME H. E. MORGAN, STATION MANAGER										TELEPHONE NUMBER AREA CODE 7 1 4 3 6 8 - 6 2 4 1						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC						
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)												X NO				
Abstract (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																
<p>Technical Specification (TS) Surveillance Requirement 4.11.2.1.2, Table 4.11-2 requires that continuous iodine and particulate samples from the Containment Purge Stack be taken, collected every seven days and analyzed within 48 hours of being collected. From 11/18/87 at 1855 until 11/21/87 at 1120, with the normal containment purge monitor 2RT-7828 inoperable for surveillance testing, the containment purge release was being monitored by effluent monitor 2RT-7865. On 12/1/87 at 1440, during a routine review of effluent data, it was discovered that the 11/18 to 11/21 samples from 2RT-7865 had not been collected and analyzed. The TS interval, including the 25% extension, for the collection of these samples was exceeded on 11/27. Subsequent analyses of the samples indicated the discharge constituents to be consistent with independent purge samples taken from 11/21 to 11/24. Based on this, effluent releases were determined to be well within TS limits. There was, therefore, no safety significance to this event.</p> <p>The cause of this event was inadequate administrative controls. After 2RT-7828 was returned to service on 11/21, the day shift chemistry technician verified that the radiation monitors and associated sample lines had been properly realigned, but collection of the samples from 2RT-7865 was deferred to the swing shift. However, the samples were not collected during the swing shift because the checklist portion of the Shift Turnover Sheet, which is relied upon for ensuring timely collection of samples, does not account for the situation in which purge samples may need to be collected following changeover of radiation monitors.</p> <p>As corrective action, appropriate procedures will be revised to specifically address the need to collect and analyze samples when radiation monitors are realigned during a release, including independent verification sign-offs. This event and the procedure changes will be reviewed by all Unit 1, 2 and 3 chemistry technicians.</p>																

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

SAN ONOFRE NUCLEAR GENERATION STATION UNIT 2	DOCKET NUMBER 05000361	LER NUMBER 87-030-00	PAGE 2 OF 5
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Plant: San Onofre Nuclear Generating Station (SONGS)

Unit: 2

Reactor Vendor: Combustion Engineering

Event Date: November 27, 1987

A. PLANT CONDITIONS AT TIME OF THE EVENT:

Mode: (5) Cold Shutdown
Containment purge release in progress.

B. BACKGROUND INFORMATION:

Technical Specification Surveillance Requirement 4.11.2.1.2, Table 4.11-2 requires that continuous iodine and particulate samples from the Containment Purge Stack be taken, collected every seven days and analyzed within 48 hours of being collected.

Containment purge releases from the Unit 2 Containment can be monitored by either the Containment Purge Effluent Monitor 2RT-7828 or the Wide Range Vent/Purge Gaseous Effluent Monitor 2RT-7865. Normally, 2RT-7865 is aligned to monitor the Plant Vent Stack. However, when 2RT-7828 is inoperable, 2RT-7865 is aligned to the Containment Purge Stack.

The sampling skid for Monitor 2RT-7865 contains redundant trains of iodine/particulate sample lines containing separate sample cartridge assemblies. Thus, when the monitor alignment is changed to either the Plant Vent Stack or the Purge Stack, the sample lines are also realigned. This arrangement allows 2RT-7865 to be realigned without requiring immediate replacement of sample cartridges.

C. DESCRIPTION OF THE EVENT:

1. Event:

From 11/18/87 at 1855 until 11/21/87 at 1120, with 2RT-7828 removed from service to perform a 92-day surveillance, the Containment purge was being monitored by 2RT-7865. On 11/21/87 at 1120, after 2RT-7828 was returned to service, 2RT-7865 was then aligned to the Plant Vent Stack. The iodine/particulate sample cartridges from 2RT-7865 were not collected and analyzed until 10 days later (12/1/87). This is contrary to Technical Specification 4.11.2.1.2, Table 4.11-2, which requires that such samples be collected weekly. The Technical Specification interval, including the 25% extension, for the collection of these samples was exceeded on 11/27/87.

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2. Inoperable Structures, Systems or Components that Contributed to the Event:
None.

3. Sequence of Events:

TIME	ACTION
11/18/87 at 1100	Containment purging terminated. Samples collected from 2RT-7828.
11/18/87 at 1238	Monitor 2RT-7828 inoperable for 92-day surveillance.
11/18/87 at 1855	Monitor 2RT-7865 aligned to the Containment Purge Stack, Containment purging initiated.
11/21/87 at 1018	Purge Monitor 2RT-7828 returned to service.
11/21/87 at 1120	Monitor 2RT-7865 aligned to the Plant Vent Stack.
11/24/87 at 0930	Weekly samples collected from 2RT-7828 (analyzed within 48 hours).
12/1/87 at 1400	Discovered that 2RT-7865 particulate and iodine samples have not been collected and analyzed.
12/1/87 at 2235	Analyses of samples completed.

4. Method of Discovery:

The delinquency in sample collection and analysis was discovered during a routine review of effluent data.

5. Personnel Actions and Analysis of Actions:

Not applicable.

6. Safety System Responses:

Not applicable.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

SAN ONOFRE NUCLEAR GENERATION STATION UNIT 2	DOCKET NUMBER 05000361	LER NUMBER 87-030-00	PAGE 4 OF 5
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D. CAUSE OF THE EVENT:

1. Immediate Cause:

The immediate cause of this event was miscommunication. The day shift technician, who received notification that 2RT-7865 was being realigned from the Containment Purge Stack to the Plant Vent Stack, knew and understood the surveillance requirement. Normally, sample cartridges are collected immediately following the removal of the sampling train from service; however, because in this case it was at the end of the day shift, the Chemistry Technician elected to turn over this responsibility to the oncoming swing shift. Information regarding the realignment of the monitors and the sample line train changeover was properly recorded in the Chemistry Logs. However, the need to collect these samples was not communicated effectively to the oncoming swing shift Chemistry technician during the shift turnover process. The swing shift technician verified that the sampling trains for 2RT-7865 were properly changed, but the technician did not associate this change with a need to collect and analyze the samples.

2. Root Cause:

The root cause of this event is inadequate administrative controls. It is expected that verbal miscommunication will occasionally occur during shift turnovers. Thus, administrative controls are relied upon for ensuring Technical Specification surveillances are performed in a timely manner.

Typically, effluent samples are collected at a periodicity prescribed by Technical Specifications or when the release is terminated. In this case, the checklist portion of the Primary Lab Shift Turnover sheet is expected to identify to the technician the need to collect and analyze purge samples. The applicable checklist item reads "Containment Purge/Vent Secured (Post Purge particulate and iodine analysis required)". Because the purge was not secured, the "No" block was properly checked by the technician. The administrative controls, therefore, did not account for the situation in which purge samples may need to be collected following changeover of radiation monitors.

E. CORRECTIVE ACTIONS:

1. Corrective Actions Taken:

The particulate and iodine samples were collected and analyzed following discovery of the incomplete containment purge effluent data for the period involved. A spectra analysis of the samples from 2RT-7865 showed the same constituents and about the same activity levels as the 11/21 to 11/24 samples collected from 2RT-7828. Based on this, a correction for decay was applied to the analysis results to establish the activities released.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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2. Planned Corrective Actions:

- a. The Primary Lab Shift Turnover Sheet checklist will be revised to include sampling requirements for monitor realignment. Effluent sampling and analysis procedures will be enhanced to specifically address the need to collect and analyze samples when radiation monitors are realigned during a release.
- b. As an additional measure to ensure particulate and iodine samples are collected and analyzed, gaseous effluent release permit procedures will be revised to specifically address the need for these analyses, including independent verification sign-offs, when radiation monitors are realigned.
- c. This event and the procedure changes stated above will be reviewed by all Unit 1, 2 and 3 chemistry technicians.

F. SAFETY SIGNIFICANCE OF THE EVENT:

There was no safety significance to this event since subsequent analyses of the samples were consistent with purge samples taken from 11/21/87 to 11/24/87, and effluent releases remained well within Technical Specification limits.

G. ADDITIONAL INFORMATION:

1. Component Failure Information:

Not applicable.

2. Previous LERs on Similar Events:

The following LERs involve delinquent or missed effluent sample collection and analyses. Significant administrative control changes for prompting, documenting and verifying Technical Specification sampling requirements were implemented in 1986. Since implementation of these controls, until this event, there have been no missed samples (over a 15 month period). However, these administrative controls failed to account for the infrequent occurrence of realigning radiation monitors during a release.

LER 3-86-007
LER 1-86-006
LER 3-86-004
LER 2-85-048
LER 2-85-026
LER 2-85-004
LER 3-84-027



Southern California Edison Company

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MICHAEL A. WHARTON
ASSISTANT TECHNICAL MANAGER

December 31, 1987

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

Subject: Docket No. 50-361
30-Day Report
Licensee Event Report No. 87-030
San Onofre Nuclear Generating Station, Unit 2

Pursuant to 10 CFR 50.73(a)(2)(i)(B), this submittal provides the required 30-day written Licensee Event Report (LER) for an occurrence involving gaseous effluent sampling and analysis. Neither the health and safety of plant personnel nor the health and safety of the public was affected by this event.

If you require any additional information, please so advise.

Sincerely,

H. Emory

Enclosure: LER No. 87-030

cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 and 3)

J. B. Martin (Regional Administrator, USNRC Region V)

Institute of Nuclear Power Operations (INPO)

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