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ACCESSION NBR:8808120194 DOC.DATE: 88/08/01 NOTARIZED: NO DOCKET #
 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 88-018-00:on 880629,Tech Spec required turbine plant
 effluent sample discarded due to insufficient guidance.
 W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 6
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL		RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1 1		PD5 PD	1 1
	HICKMAN,D	1 1			
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
	ARM/DCTS/DAB	1 1		DEDRO	1 1
	NRR/DEST/ADS 7E	1 0		NRR/DEST/CEB 8H	1 1
	NRR/DEST/ESB 8D	1 1		NRR/DEST/ICSB 7	1 1
	NRR/DEST/MEB 9H	1 1		NRR/DEST/MTB 9H	1 1
	NRR/DEST/PSB 8D	1 1		NRR/DEST/RSB 8E	1 1
	NRR/DEST/SGB 8D	1 1		NRR/DLPQ/HFB 10	1 1
	NRR/DLPQ/QAB 10	1 1		NRR/DOEA/EAB 11	1 1
	NRR/DREP/RAB 10	1 1		NRR/DREP/RPB 10	2 2
	NRR/DRIS/SIB 9A	1 1		NUDOCS-ABSTRACT	1 1
	REG FILE 02	1 1		RES TELFORD,J	1 1
	RES/DSIR DEPY	1 1		RES/DSIR/EIB	1 1
	RES/DSR DEPY	1 1		RGN5 FILE 01	1 1
EXTERNAL:	EG&G WILLIAMS,S	4 4		FORD BLDG HOY,A	1 1
	H ST LOBBY WARD	1 1		LPDR	1 1
	NRC PDR	1 1		NSIC HARRIS,J	1 1
	NSIC MAYS,G	1 1			

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					Page (3) 1 of 0 5							
Title (4) TECHNICAL SPECIFICATION REQUIRED TURBINE PLANT EFFLUENT SAMPLE DISCARDED DUE TO INSUFFICIENT GUIDANCE																						
EVENT DATE (5)			LER NUMBER (6)					REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)											
Month	Day	Year	Year	///	Sequential	///	Revision	Month	Day	Year	Facility Names				Docket Number(s)							
0 6	2 9	8 8	8 8	---	0 1 8	---	0 0	0 8	0 1	8 8	NONE				0 5 0 0 0							
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)																			
POWER LEVEL (10) 1 0 0 //////////////////// //////////////////// //////////////////// //////////////////// ////////////////////			<input type="checkbox"/> 20.402(b)					<input type="checkbox"/> 20.405(c)					<input type="checkbox"/> 50.73(a)(2)(iv)					<input type="checkbox"/> 73.71(b)				
			<input type="checkbox"/> 20.405(a)(1)(i)					<input type="checkbox"/> 50.36(c)(1)					<input type="checkbox"/> 50.73(a)(2)(v)					<input type="checkbox"/> 73.71(c)				
			<input type="checkbox"/> 20.405(a)(1)(ii)					<input type="checkbox"/> 50.36(c)(2)					<input type="checkbox"/> 50.73(a)(2)(vii)					<input type="checkbox"/> Other (Specify in				
			<input type="checkbox"/> 20.405(a)(1)(iii)					<input checked="" type="checkbox"/> 50.73(a)(2)(i)					<input type="checkbox"/> 50.73(a)(2)(viii)(A)					Abstract below and in text)				
			<input type="checkbox"/> 20.405(a)(1)(iv)					<input type="checkbox"/> 50.73(a)(2)(ii)					<input type="checkbox"/> 50.73(a)(2)(viii)(B)									
<input type="checkbox"/> 20.405(a)(1)(v)					<input type="checkbox"/> 50.73(a)(2)(iii)					<input type="checkbox"/> 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 NPRDS	////////	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	////////											
					////////						////////											
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SUPPLEMENTAL REPORT EXPECTED (14)												Expected Submission Date (15)		Month	Day	Year						
<input type="checkbox"/> Yes (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO																						
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																						

On July 2, 1988, with Unit 2 at 100% power and the Turbine Building Sump (TBS) compositor (proportional sampler) out of service, it was discovered that a daily TBS effluent grab sample had been discarded, contrary to Technical Specification (TS) 4.11.1, Table 4.11-1. As a result, the contribution of the TBS contents released on June 29 could not be positively determined as required by the TS. There is no safety significance to this event since the measured gamma activity levels of the shiftly grab samples from the TBS on June 29 were below the lower level of detection (LLD), indicating that the contribution of gross alpha, Sr-89, Sr-90, and Fe-55 would almost certainly have been below LLD.

Chemistry Technicians utilize the Shift Requirements Sheet, a computer-generated list of sampling requirements, and the Continuous Effluent Log to track the status of TS required samples. Insufficient guidance was provided to the Chemistry technicians regarding completion of these forms, allowing the Chemistry foreman to discard the sample. In addition, labeling of the sample bottle was not sufficient to adequately convey to the foreman that the sample was also to be used as a composite sample.

Increased guidance will be provided regarding completion of the Shift Requirements Sheet. The Continuous Effluent Log will be amended to reflect the storage of required composite samples, rather than merely the collection of samples which are used to make the composite. The procedure governing the labeling of samples will be amended to include a statement on complete labeling of samples collected. This event will be reviewed with appropriate Chemistry personnel.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

SAN ONOFRE NUCLEAR GENERATION STATION UNIT 2	DOCKET NUMBER 05000361	LER NUMBER 88-018-00	PAGE 2 OF 5
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Plant: San Onofre Nuclear Generating Station
Unit: Two
Reactor Vendor: Combustion Engineering
Event Date: 07-02-88

A. CONDITIONS AT TIME OF THE EVENT:

Mode: 1, Power Operation

B. BACKGROUND INFORMATION:

The Turbine Building Sumps (TBSs) (east and west) (EIIS System Code WK) collect normal equipment and floor drainage from the turbine plant. The unit 2 east TBS also collects drainage from the auxiliary building sump. When the sump levels increase to a preset level, sump pumps operate automatically (typically once or twice every eight hours) to discharge the sump contents. Normal discharge is to the oily waste sump. If radioactivity in excess of the radiation monitor setpoint is detected, the discharge is automatically stopped and, if necessary, manually initiated to the radwaste area sump.

Technical Specification (TS) 3.3.3.8 states that if the TBS effluent monitor, RT-7821 (EIIS System Code IL), is inoperable, releases may continue provided grab samples are collected and analyzed every 8 hours (i.e. shiftly). (Once per 6-hour samples are collected administratively to meet the once per 8-hour TS requirement). TS 4.11.1, Table 4.11-1 requires that daily grab samples be taken from the TBS when the compositor (proportional sampler) is out of service. The daily grab samples are analyzed at the site for gamma and tritium and saved to make weekly, monthly, and quarterly composite samples, which are representative of the liquids released, for TS required analyses to be performed off site. The composite samples are used to determine the contribution of the TBS release to the annual release of gross alpha, Sr-89, Sr-90, and Fe-55.

Chemistry Technicians utilize the Shift Requirements Sheet, a computer-generated list of sampling requirements, and the Continuous Effluent Log to track the status of TS required samples.

C. DESCRIPTION OF THE EVENT:

1. Event:

On July 2, 1988, with Unit 2 at 100% power and the TBS compositor out of service, it was discovered that a daily TBS effluent grab sample had been discarded, contrary to Technical Specification (TS) 4.11.1, Table 4.11-1. As a result, the contribution of the TBS contents released on June 29 could not be positively determined as required by the TS.

2. Inoperable Structures, Systems or Components that Contributed to the Event:

Both the TBS effluent radiation monitor (RT-7821) and the TBS compositor (AP-5887) were out of service, requiring grab samples to be taken both for analysis and blending into a composite sample.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

SAN ONOFRE NUCLEAR GENERATION STATION	DOCKET NUMBER	LER NUMBER	PAGE
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3. Sequence of Events:

<u>DATE</u>	<u>ACTION</u>
6/3/88	TBS compositor removed from service and daily grab sampling of the TBS initiated.
6/9/88	TBS effluent radiation monitor RT-7821 removed from service for design change work and once per 8 hour sampling and analysis initiated.
6/29/88	TBS "0800" shift sample obtained. Since this sample can also serve to meet the daily sampling requirement, the Chemistry technician noted the collection of the sample on the Continuous Effluent Log and on the Shift Requirements sheet as meeting the requirements for both the TBS radiation monitor and compositor being out of service. The sample was labeled "2TBS once per 6-hour sample". A second chemistry technician verified the collection of the sample by reviewing the Continuous Effluent Log. After the isotopic analysis was performed, it was placed with other samples to be reviewed by a chemistry foreman prior to discarding.
6/30/88	Chemistry Foreman discarded the June 29 "0800" TBS sample, believing that the composite sample was stored and that the June 29 "0800" sample was no longer needed since the isotopic analysis had been completed.
7/2/88	During the process of mixing the weekly composite sample, the June 29 daily sample was discovered to have been discarded.

4. Method of Discovery:

On July 2, during the process of mixing the weekly composite sample, the June 29 daily sample was discovered to have been discarded.

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

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D. CAUSE OF THE EVENT:

1. Immediate Cause:

The Chemistry foreman discarded the daily (June 29) TBS effluent grab sample to be used in the makeup of the composite sample.

2. Intermediate Cause:

- a. Chemistry technicians have routinely initialed the Shift Requirements Sheet when a sample is collected, not when the analysis is completed or the composite stored.
- b. Verification of the requirement for the TBS composite sample was performed by reviewing the Continuous Effluent Log rather than by physically confirming that the sample was in the storage cabinet.
- c. The 6/29 "0800" TBS sample bottle had been labeled "2TBS once per 6 hour sample". This did not adequately convey to the foreman that the sample was also to be used in the composite sample.

3. Root Cause:

Insufficient guidance was provided to the Chemistry technicians regarding completion of the Shift Requirements Sheet or Continuous Effluent Log and labeling of effluent samples.

E. CORRECTIVE ACTIONS:

1. Corrective Actions Taken:

Appropriate quantities from the samples collected on June 28 and June 30 were used for the contribution of the discarded June 29 sample to the weekly composite sample.

2. Planned Corrective Actions:

- a. Increased guidance will be provided regarding completion of the Shift Requirements Sheet. Physical verification of the storage of composite samples will be the required confirmation method rather than a review of the Continuous Effluent Log.
- b. The Continuous Effluent Log will be amended to reflect the storage of required composite samples, rather than merely the collection of samples which are used to make the composite.
- c. The procedure governing the labeling of samples will be amended to include direction on complete labeling of samples collected.
- d. This event will be reviewed with appropriate Chemistry personnel.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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F. SAFETY SIGNIFICANCE OF THE EVENT:

There is no safety significance to this event since the measured activity levels of the shiftly grab sample from the TBS were below the lower level of detection (LLD), indicating that the contribution of gross alpha, Sr-89, Sr-90, and Fe-55 would almost certainly have been below LLD.

G. ADDITIONAL INFORMATION:

1. Component Failure Information:

Not Applicable

2. Previous LERs on Similar Events:

The following LERs* involve delinquent or missed 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 the events reported in LER 2-87-030, LER 3-88-001, and LER 1-88-007, there were no missed samples (over a 15 month period). These controls were ineffective, however, since they allowed both the Shift Requirements Sheet and the Continuous Effluent Log to be initialed when samples were collected for a composite sample, rather than when the composite sample was actually stored.

LER 1-88-007	LER 1-86-003	LER 2-85-004
LER 3-88-001	LER 1-86-006	LER 3-84-042
LER 2-87-030	LER 3-86-004	LER 3-84-027
LER 3-87-004	LER 2-85-048	LER 3-84-020
LER 3-86-007	LER 2-85-026	

* Unit 1--Docket No. 50-206
 Unit 2--Docket No. 50-361
 Unit 3--Docket No. 50-362

3. Results of NPRDS Search:

Not Applicable



Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING STATION

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

H. E. MORGAN
STATION MANAGER

TELEPHONE
(714) 368-6241

August 1, 1988

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

Subject: Docket No. 50-361
30-Day Report
Licensee Event Report No. 88-018
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 a condition prohibited by Technical Specifications. This event had no effect on the health and safety of either plant personnel or the public.

If you require any additional information, please so advise.

Sincerely,

Enclosure: LER No. 88-018

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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