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SUBJECT: Provides evaluation of activities associated w/in-service testing program due to circumstances which necessitated util request for temporary waiver of compliance to permit testing of LPSI pump suction header check valves.

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July 31, 1992

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Mr. Stuart Richards  
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Dear Mr. Richards:

Subject: Docket Nos. 50-361 and 50-362  
Inservice Testing Program  
San Onofre Nuclear Generating Station  
Units 2 and 3

In accordance with a commitment made during the October 16, 1991, management meeting, this letter provides our evaluation of certain activities associated with the Inservice Testing (IST) Program at San Onofre Units 2 and 3. This evaluation was performed because the circumstances which necessitated SCE's request for a Temporary Waiver of Compliance to permit testing of the Low Pressure Safety Injection (LPSI) pump suction header check valves were considered avoidable and therefore did not meet SCE's performance expectations.

BACKGROUND

The ASME Code Section XI, IWV-3411 requirement for testing of the LPSI pump suction header check valves is to full stroke exercise these valves every 3 months. Valve Relief Request 12 was originally submitted with the initial Unit 2 IST program on March 3, 1982. This original request was proposed to partial stroke exercise these valves during periodic tests of the LPSI pumps during normal operation and to conduct mini-flow tests every three months.

This relief request was subsequently revised several times both to reflect SCE desired changes and to respond to NRC requests. The final revision (Revision 16 to the IST Program) added a stroke test using flow from the refueling water storage tank during the fill of the refueling cavity to comply with the provisions for approval of this relief request included in the NRC's September 24, 1990, Safety Evaluation Report (SER) for the IST Programs. The relief request was approved in the NRC's October 2, 1991, SER.

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Valve Relief Request 12 and the method of testing the LPSI pump suction header check valves was one of the last of the technical issues resolved prior to the July 31, 1991, submittal of Revision 16 to the IST program. At the time of the submittal it was concluded that these check valves could be full stroke tested by operating the LPSI pumps at 4150 gpm during the fill of the refueling cavity.

On August 17, 1991, the Unit 2 Cycle 6 refueling outage started. During this outage, on October 2, 1991, the NRC issued the revised SER approving Valve Relief Request 12. It was at this time that SCE proceeded to plan the testing of the LPSI pump suction header check valves. Although the refueling cavity had already been filled and fuel was in the reactor vessel, it was still believed that the test could be conducted.

At this point an independent review by the engineering organization identified that the appropriate flow rate for the LPSI pumps to test these check valves needed to be 5000 to 5300 gpm. The value of 4150 gpm was the nominal design pump flow as stated in the UFSAR. However, in the event of a single failure, the loss of one pump will bring the remaining pump to a maximum flow rate of 5000 to 5300 gpm. At this flow rate it was no longer possible to test the check valves with fuel in the reactor in accordance with Technical Specification 3.9.8.1 or 3.9.8.2 since the test would have required one train of the shutdown cooling system to be removed from operation and the starting water level in the refueling cavity to be less than the minimum required cavity level. This necessitated the October 9, 1991 request for a Temporary Waiver of Compliance which was granted by the NRC on October 10, 1991.

#### EVALUATION

The circumstances which necessitated SCE's request for a Temporary Waiver of Compliance were avoidable and did not meet our expectations. SCE's evaluation identified four problems that contributed to these circumstances, as discussed below.

#### Failure to Revise IST Program Implementation

SCE's determination that full flow testing of the LPSI pump suction header check valves was feasible was made immediately prior to the July 31, 1991 submittal of the valve relief request. Although it had previously been our practice to revise the testing procedures based on the most current revision of the as submitted IST Program, the testing procedures were not revised at the time of this submittal. The basic cause of this was inadvertent oversight on the part of multiple individuals involved with IST testing and the failure to communicate the relative urgency of the test planning.

#### Lack of Documentation for IST Program Parameters

The need to conduct the IST testing with a greater pump flow rate was not identified by the engineering organization until planning for the test was initiated. This flow requirement was not readily identifiable by the personnel involved with the IST testing since there was no single document available with the basis for all of the parameters associated with the performance of inservice testing.

#### Weakness in Work Control Process

The July 31, 1991, letter ~~Process~~ ~~edra~~ inter-disciplinary review prior to submittal to ensure its technical accuracy. However, the review process did not include clear identification of "ownership" of specific information within the letter as it was routed for review. This process did not make it clear to supervisory and management personnel what information in the letter was their responsibility. Thus the responsibility for implementation of the proposed new testing was not specifically identified. This was a weakness in the process used for the review and approval of correspondence.

#### Failure to Initiate Commitment Tracking

All commitments made to the NRC are required to be logged and tracked in the Regulatory Commitment Tracking System. Submittal of the revised valve relief request on July 31, 1991, was not recognized at the time as a commitment on SCE's part to implement the revised testing pending NRC review and approval. The Licensing personnel involved did not generate specific commitment entries to revise the IST Program in accordance with this relief request. Therefore, our primary commitment tracking tool did not act as the necessary safety net to ensure that this change to the program was implemented in a timely manner. Furthermore, a specific commitment item would have also focused management attention on the required implementation date for the testing. The cause of this failure was personnel error on the part of the Licensing personnel involved.

#### CORRECTIVE ACTIONS

Based on the results of the evaluation summarized above, the following actions are being implemented:

1. The Design Basis Document group is currently preparing an IST Topical which will address IST licensing and programmatic requirements. In addition, the System DBDs will validate the IST database, currently under revision, to add design basis parameters and values. These actions will be completed

Mr. Stuart Richards

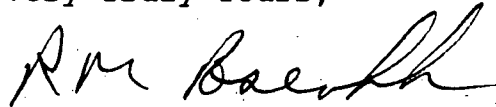
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consistent with the schedule contained in the DBD Program Plan submitted to the NRC on March 26, 1992.

2. All Licensing personnel received additional training regarding the identification of commitments and use of the Regulatory Commitment Tracking System. This training was completed in November, 1991.
3. As an interim measure, Nuclear Licensing implemented a second review of letters to the NRC to verify that commitments have been identified and appropriate actions have been assigned and agreed to. This was implemented in November 1991.
4. SCE is evaluating mechanisms to clearly identify responsibility for information included in SCE correspondence to the NRC. This evaluation will be completed and appropriate changes made to the review and approval process by September 30, 1992.
5. Personnel involved in this event have been counseled.

If you have any questions or would like additional information on this subject, please let me know.

Very Truly Yours,



cc: J. B. Martin, Regional Administrator, NRC Region V  
M. B. Fields, NRC Project Manager, San Onofre  
Units 2 and 3  
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre  
Units 1, 2, and 3