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SCE

SAN ONOFRE NUCLEAR GENERATING STATION

P.O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

REGION V

TELEPHONE
(714) 492-7700

H. E. RAY
STATION MANAGER

May 10, 1982

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Walnut Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. R. H. Engelken, Regional Administrator

Docket No. 50-361
Licensee Event Report No. 82-011
San Onofre, Unit 2

Reference: Letter, H. B. Ray (SCE) to R. H. Engelken, dated April 28, 1982.

Dear Sir:

This letter describes a reportable occurrence involving inoperable Engineered Safety Feature Actuation System (ESFAS) instrumentation at San Onofre Unit 2. Reporting is in accordance with the requirements of Section 6.9.1.12.b of Appendix A to Operating License NPF-10.

Technical Specification 3.3.2.b and Table 3.3-3, Action 13, require the Control Room Emergency Air Cleanup System to be maintained in the emergency mode of operation within one hour of the time that both channels of the Control Room Airborne Radiation Monitor are made or discovered to be inoperable. On March 13, 1982, at 1005 hours, the single operable channel of the Control Room Airborne Radiation Monitor was taken out of service for maintenance involving lubrication of the sample pump. Trains A and B of the Control Room Emergency Air Cleanup System had been in operation during the morning for reasons unrelated to this incident; however, both trains were secured and placed in the normal standby mode by 1025 hours. The Airborne Radiation Monitor was not fully returned to service until operation of the sampling pump was verified at 1300 hours. Thus, while both trains were available and demonstrably operable, operation of the Control Room Emergency Air Cleanup System was not maintained as required by Technical Specifications from 1105 to 1300 hours, a period of 1 hour and 55 minutes. Had the need arisen, either train could have been activated manually.

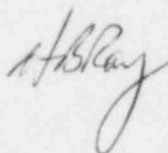
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A subsequent investigation has determined that the Technical Specification and Action Statement requirements had been reviewed and acknowledged by Control Room personnel and equipment control forms were properly documented prior to the occurrence. Failure to maintain operation of the Emergency Air Cleanup System was an administrative oversight. The level of Control Room activity, involving as it did parallel activities required for the maintenance, surveillance, and operation of these and various other systems was a contributing factor. SCE has been unable to identify any additional similar occurrences and concludes that this is, in fact, an isolated case and warrants treatment as such. This incident has been discussed with both the operators and equipment control personnel. In these discussions, special emphasis was given to the optional use of magnetic caution tags as described in the existing SCE operating instruction SO23-0-19, "Use of Caution Tags, Magnetic Tags and Instrument Labels". Use of these tags could have prevented the untimely removal from service of the Train B Emergency Air Cleanup System. Their use may be called out on the Equipment Control form by simply noting it in the block entitled, "Capability Limitations/Options". Equipment control personnel agreed to employ these tags, as appropriate in the future. This incident had no effect on public health or safety.

Discovery of this reporting omission was made during an internal review of recent operating incidents initiated unilaterally by SCE for the purpose of identifying this type of problem. This incident was discussed with the Unit 2 Resident Inspector on April 27, 1982, immediately following the evaluation of the event reporting status. Written notification by facsimile transmission was provided to Region V on April 28, 1982. If you should require additional information concerning this occurrence, please contact me.

Sincerely,



Enclosure: (LER 82-011)

cc: U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement

U. S. Nuclear Regulatory Commission
Office of Management Information and Program Control (MPIC)

Institute of Nuclear Power Operations (INPO)

A. E. Chaffee - (USNRC Resident Inspector - San Onofre, Unit 2)