

*Southern California Edison Company*

SAN ONOFRE NUCLEAR GENERATING STATION

P.O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

H. B. RAY

STATION MANAGER

April 16, 1982

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



Docket No. 50-361  
Licensee Event Report 82-010  
San Onofre Nuclear Generating Station Unit 2

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

Dear Mr. Engelken:

- Reference:
- a) Southern California Edison letter, H. B. Ray to R. H. Engelken dated April 1, 1982.
  - b) Southern California Edison letter, H. B. Ray to R. H. Engelken dated March 29, 1982.

Reference (a) provided prompt notification to your office of an event involving inadequate fire watches for inoperable fire rated assemblies and/or sealing devices. In accordance with Technical Specification 6.9.1.12.b of Appendix A to Operating License NPF-10 for San Onofre Nuclear Generating Station Unit 2, this letter is submitted as the required 14 day follow up report and enclosed is a completed copy of Licensee Event Report (LER) 82-010.

Technical Specification Limiting Condition for Operation number 3.7.9 requires that a continuous fire watch, or roving watch with a verified operable fire detector, be established where fire rated assemblies and/or sealing devices are inoperable. This is to be established within one hour and the device is to be made operable within seven days. We have established numerous fire watches and, being unable to re-establish operability of the sealing devices within seven days, have submitted the Special Report of Reference (b).

Enclosed in Reference (b) was a listing of approximately 350 fire rated assemblies and sealing devices determined to be inoperable as of that date. In compliance with LCO 3.7.9.a, a fire watch program was established for these seals.

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On April 1, 1982, additional inspections revealed that this listing was incomplete in that it contained only fire barrier "penetrations" by pipe or conduit whose "seals" were not yet installed or were in need of repair. The listing did not however, include such additional breeches of fire barriers as open access hatches, nor wall and floor openings providing construction access or through which "penetration" by pipe or conduit had not yet been made. These additional openings constituted additional inoperable fire barriers for which appropriate fire watches could not be immediately confirmed to exist, and the prompt report of Reference (a) was made.

Our evaluation of this occurrence has concluded that fire watches established for inoperable fire barrier penetration seals, identified in the reference (b) report, provided adequate fire protection for the additional fire barrier breeches identified on April 1, except in two areas. Fire watches were immediately established in these areas. However, since these fire barrier openings had existed since before receipt of the Operating License, and since no fire watches were established or other compensatory measures taken in these two areas until April 1, 1982, non-compliance with license condition 2.C.(14).d and LCO 3.7.9.a existed for that period of time.

As a result of this occurrence, a survey of all fire barriers was conducted and our program for identifying and controlling inoperable "fire rated assemblies" and establishing compensatory measures for fire protection was reviewed. The program was found to adequately identify any new fire barrier breeches as well as fire barrier penetration seals broken or in need of repair. Close surveillance for compliance with these program requirements is conducted by site Quality Assurance.

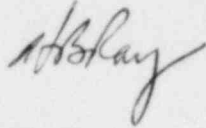
Ongoing construction activity in both units 2 and 3, which share some fire barriers in buildings common to both units, results in continual fire barrier breeching and restoration. The number of inoperable fire barriers changes from hour to hour.

As of this date, there are a total of 321 inoperable fire barrier seals, 247 of which have been inoperable for 7 days or more. There were over 1100 inoperable seals on February 16, 1982 and 354 inoperable seals on March 29, 1982.

We are presently evaluating additional methods to further reduce the total number of inoperable fire barrier penetrations and especially the number that remain inoperable for a period of seven days or more. Our followup to this report will be made on May 15, 1982 and will contain data to document our progress in this area.

If there are any questions concerning this matter, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "H. Blay".

Enclosure Licensee Event Report 82-010

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

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

Institute of Nuclear Power Operations (INPO)

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