Southern California Edison Company

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92674-0128

R. W. KRIEGER
VICE PRESIDENT
NUCLEAR GENERATION

TELEPHONE
714-368-6255

January 17, 1995

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

Subject: Docket Nos. 50-361 and 50-362
Supplemental Report
Licensee Event Report No. 94-003, Revision 1
San Onofre Nuclear Generating Station, Units 2 and 3

References: 1) Letter, R. W. Krieger (Edison) to USNRC Document Control Desk, dated May 20, 1994

2) Letter, R. W. Krieger (Edison) to USNRC Document Control Desk, dated July 29, 1994

Reference 1) provided Licensee Event Report (LER) No. 94-003 reporting a violation of the Technical Specifications involving missed fire protection surveillances in Units 2 and 3. Since these occurrences involved similar systems, causes, and corrective actions applicable to Units 2 and 3, a single report for Unit 2 was submitted in accordance with NUREG-1022. In Reference 2), Edison indicated that the investigation to collectively examine the missed fire protection surveillances was in progress and a revision to LER No. 94-003 would be submitted upon completion of the investigation.

Edison discussed the status of the investigation with Mr. Dyle Acker, NRC Region IV, on December 21, 1994. As discussed with Mr. Acker, additional time was required to complete two of the divisional investigations and overall interdivisional investigation report by the organizations involved. Mr. Acker acknowledged our new submittal date of January 31, 1995. The

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enclosed revision to LER 2-94-003 is based on completion of these reports. Neither the health nor the safety of plant personnel or the public was affected by these occurrences.

If you require any additional information, please so advise.

Sincerely,

Enclosure: LER No. 94-003, Revision 1

cc: L. J. Callan, Regional Administrator, NRC Region IV
A. B. Beach, Director, Division of Reactor Projects, Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

LICENSEE EVENT REPORT (LER)

Facility Name (1)	Docket Number (2)	Page (3)
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2	0 5 0 0 0 3 6 1	1 of 0 4

Title (4)

Missed Fire Protection Surveillances Due to Inattention to Detail and Lack of Management Oversight

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)
									UNIT 3	0 5 0 0 0 3 6 2
0 4	2 2	9 4	9 4	0 0 3	0 1	0 1	1 7	95		

OPERATING MODE (9): 1

POWER LEVEL (10): 0 9 8

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)

___	20.402(b)	___	20.405(c)	___	50.73(a)(2)(iv)	___	73.71(b)
___	20.405(a)(1)(i)	___	50.36(c)(1)	___	50.73(a)(2)(v)	___	73.71(c)
___	20.405(a)(1)(ii)	___	50.36(c)(2)	___	50.73(a)(2)(vii)	___	Other (Specify in Abstract below and in text)
___	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	TELEPHONE NUMBER (AREA CODE)
R. W. Krieger, Vice President, Nuclear Generation	7 1 4 3 6 8 - 6 2 5 5

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

SUPPLEMENTAL REPORT EXPECTED (14)

___ Yes (If yes, complete EXPECTED SUBMISSION DATE) X NO

Expected Submission Date (15): Month ___ Day ___ Year ___

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On April 22, 1994, during a reliability centered maintenance review of the Fire Protection system, Edison noted that a three year Technical Specification (TS) air flow test for six manual deluge open head spray/sprinkler systems had not been performed for the following components:

Unit 2 Charcoal Filter for Containment Hydrogen Purge Exhaust (2A-082)
Unit 3 Charcoal Filter for Containment Hydrogen Purge Exhaust (3A-082)
Two Common Charcoal Filters for Control Room Emergency Ventilation (A-206 & 207)
Two Common Charcoal Filters for Control Room Emergency AC (E-418 & 419)

Additionally, on May 9, 1994, Edison discovered that a 31 day operability TS surveillance for a Unit 2 containment recirculation unit filter (CRUF) manual isolation valve was not being performed. Edison reported these occurrences in accordance with 10CFR50.73(a)(2)(i), and is submitting this supplemental report to identify the causes of the missed surveillances.

These missed TS surveillances were caused by individual inattention to detail and lack of management oversight during procedure revision processes.

On May 13, 1994, Edison completed the required air flow surveillance tests for the six manual deluge open head spray/sprinkler systems and confirmed the systems were operable. Based on a review of Unit 2 Cycle 7 refueling outage documentation, Edison has confirmed that the CRUF manual isolation valve is in its correct (locked open) position. Edison has reviewed all Fire Protection Equipment listed in TS Table 3.7-5 and confirmed that all other required testing is being accomplished. Edison has developed the necessary administrative controls for the required surveillances.

DESCRIPTION OF THE EVENT:

Plant: San Onofre Nuclear Generating Station, Units 2 and 3
Reactor Vendor: Combustion Engineering
Event Date: April 22, 1994
Mode: Unit 2, Mode 1, 98% reactor power
Unit 3, Mode 1, 97% reactor power

Missed Three Year Air Flow Test Surveillances

On April 22, 1994, during a reliability centered maintenance review of the Fire Protection System, Edison noted that a three year Technical Specification (TS) air flow test for six manual deluge open head spray/sprinkler systems [KP, SRNK] had not been performed as required per TS 4.7.8.2.e. Specifically, the TS surveillances were not performed on the manual deluge open head spray/sprinkler systems which provide protection for the following components:

Unit 2 Charcoal Filter for Containment Hydrogen Purge Exhaust (2A-082) [BB, FLT]
Unit 3 Charcoal Filter for Containment Hydrogen Purge Exhaust (3A-082) [BB, FLT]
Two Common Charcoal Filters for Control Room Emergency Ventilation (A-206 & 207) [VI, FLT]
Two Common Charcoal Filters for Control Room Emergency AC (E-418 & 419) [VI, FLT]

Edison declared the fire water spray systems inoperable on April 22, 1994, and posted an hourly fire watch for the affected areas in accordance with TS 3.7.8.2.

Following a complete review of the maintenance records, Edison was unable to find documentation for any previous air flow test surveillances for these six spray/sprinkler systems. Edison concluded that the TS 4.7.8.2.e surveillance was not being performed as required.

Missed 31 Day Operability Surveillances

On May 9, 1994, during a followup review by Operations of firewater system related surveillances, Edison discovered that a Unit 2 containment recirculation unit filter (CRUF) manual isolation valve [BK] (ISV) surveillance was not being performed (Edison has been correctly surveilling the corresponding Unit 3 valve). TS 4.7.8.2.b requires Edison to verify that each spray and/or sprinkler system inside containment is operable every 31 days during cold shutdown or refueling, by verifying that each valve in the flow path inside containment is in its correct position. While Edison had been verifying the correct position of the inside containment spray and/or sprinkler valves for other systems, one valve (SA2301MU229) for the Unit 2 CRUF was omitted from the applicable procedure. Therefore, Edison had not been surveilling this Unit 2 valve as required.

Edison reported these occurrences in accordance with 10CFR50.73(a)(2)(i), and is submitting this supplemental report to identify the causes of the missed surveillances.

CAUSE OF THE EVENT:

Missed Three Year Air Flow Test Surveillances

Edison has completed a review of the circumstances surrounding the missed three year air flow test surveillances and determined that the six manual deluge open head spray/sprinkler systems were added to TS Table 3.7-5 by Amendment Numbers 69 and 58, dated January, 1989, for Units 2 and 3, respectively. Due to personnel (utility-maintenance personnel) inattention to detail during the procedure revision process to

incorporate the Amendment, the six manual deluge open head spray/sprinkler systems were not incorporated into surveillance procedures. Due to inadequate review of the procedure changes, these omissions were also not detected by the reviewers.

Missed 31 Day Operability Surveillances

Edison has also reviewed the surveillance history of manual isolation valve SA2301MU229 and determined that during a procedure revision in June 1984, the valve was inadvertently dropped from a check off list which was used for performing the monthly valve position verification. Therefore, valve SA2301MU229 had not been surveilled in accordance with TS 4.7.8.2.b since July 1984.

The Root Cause of this event is personnel (utility-operations personnel) inattention to detail during a June 1984 procedure revision. If the procedure writer had compared the revised procedure against the previous issue which contained SA2301MU229, the deletion could have been recognized and corrected. In addition, Edison's Inter-Division Investigation Report identified a Root Cause of lack of adequate Operation's management oversight during the procedure revision process.

The missed surveillances discussed above were separated in time by approximately four and one half years and are not related in any other manner.

CORRECTIVE ACTIONS:

Edison completed a review of all Fire Protection Equipment listed in TS Table 3.7-5 and confirmed that all other required testing is being accomplished.

Edison Quality Assurance recently completed a Unit 2/3 TS Fire Protection Audit which is performed every year. The audit is typically based on a partial sample of components; however, as a followup to these missed surveillances, the audit encompassed the Fire Protection TS in their entirety. The audit concluded the Fire Protection TS requirements were all satisfactorily implemented.

Missed Three-Year Air Flow Test Surveillances

On May 13, 1994, Edison completed the required air flow surveillance tests for the six manual deluge open head spray/sprinkler systems and confirmed the systems were operable. Edison has developed the necessary administrative controls for the required surveillances of the six manual deluge open head spray/sprinkler systems.

Missed 31-Day Operability Surveillances

Based on a review of Unit 2 Cycle 7 refueling outage documentation, Edison has confirmed that the CRUF manual isolation valve SA2301MU229 is in its correct (locked open) position. Edison added the manual isolation valve to the appropriate surveillance procedure and it will be surveilled during the next Unit 2 outage.

As a result of a similar procedure revision error (which did not result in an LER), the Operations Procedures Group Writers' Guide was revised in June 1993, to provide detailed steps to take during the procedure revision process to prevent the inadvertent loss of information.

SAFETY SIGNIFICANCE OF THE EVENT:

Control Room and Hydrogen Purge Filters:

The affected systems are manually actuated at the isolation valves. The fire areas protected by these systems have fire detectors that alarm in the control room and the

San Onofre Fire Department. In the event a fire had occurred, the control room would dispatch an operator to open the manual deluge/isolation valves. The San Onofre Fire Department would concurrently respond and would be available to suppress the fire in the event the deluge system did not suppress the fire. In addition, when surveilled, all six systems were confirmed to be operable. Therefore, there was minimal safety significance for this occurrence.

Containment Recirculation Unit Filter

The containment recirculation unit filter is designed to reduce concentrations of airborne particulates and gaseous activity inside containment during plant operation. The CRUF is not a safety-related component and is not required to operate during any design basis accident. Therefore, there was minimal safety significance for this occurrence.

ADDITIONAL INFORMATION:

LER 2-94-002 also reported missed fire protection surveillances. In those instances, the surveillances were missed because a surveillance procedure was revised without similarly revising the associated implementing Repetitive Maintenance Orders. Additionally, the errors reported in this LER occurred prior to the errors noted in LER 2-94-002; therefore, corrective actions identified in LER 2-94-002 could not have prevented the errors reported in this LER.