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U. S. Nuclear Regulatory Commission
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Washington, D.C. 20555

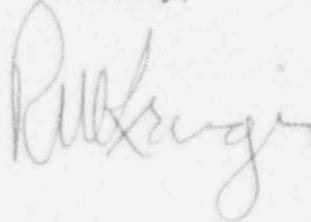
Gentlemen:

Subject: Docket No. 50-361 and 50-362
30-Day Report
Licensee Event Report No. 94-006
San Onofre Nuclear Generating Station, Units 2 and 3

Pursuant to 10 CFR 50.73(a), this submittal provides the required 30-day written Licensee Event Report (LER) for the failure to comply with the shift manning requirements of the Technical Specifications. Since this occurrence is applicable to Units 2 and 3, a single report for Unit 2 is being submitted in accordance with NUREG-1022. This condition did not affect the health or safety of the public or plant personnel.

If you require any additional information, please so advise.

Sincerely,



Enclosure: LER No. 94-006

cc: L. J. Callan, Regional Administrator, USNRC Region IV
K. E. Perkins, Jr., Director Walnut Creek Field Office, USNRC Region IV
J. A. Sloan, USNRC Senior Resident Inspector, Units 1, 2 and 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 & 3
Institute of Nuclear Power Operations (INPO)

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Edison has revised administrative procedure SO123-0-30, "SHIFT MANNING," to clarify and place more restrictive administrative limits on the allowable movement of the SRO holding the Control Room Command Function about the Control room area. The SSs and CRSS have received coaching on these requirements. A preshift brief was given on the procedure revision to each crew. There was minimal safety significance to this event.

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DESCRIPTION OF THE EVENT:

Plant: San Onofre Nuclear Generating Station, Unit 2 and 3 Reactor
 Vendor: Combustion Engineering
 Event Date: October 23, 1994
 Mode: Mode 1, Power Operation
 Power: Unit 2 98%, Unit 3 97%

Technical Specification 6.2.2, "Unit Staff," requires one Shift Superintendent (SS) and one Senior Reactor Operator (SRO) to be on shift whenever both Units 2 and 3 are in Modes 1, 2, 3 or 4. One licensed Senior Reactor Operator is required to be in the Control Room area - a requirement normally satisfied by the Control Room Supervisors (CRSs) for each unit. Technical Specification Figure 6.2-3 defines the plant areas considered to be the "control room area" (See attachment 1). The SS and CRS positions are filled with SRO licensed utility personnel.

The control room area (CRA) shown in Figure 6.2-3 (Attachment 1) was based on physical barriers (e.g. walls and doors) in place in 1982 when the control room building was constructed. In the early 1980's, Edison twice remodeled the areas adjoining the shift superintendent's office. During the second remodeling effort, a wall that formed part of the original "control room area" was removed.

On October 23, 1994, with both Units 2 and 3 in Mode 1 at approximately 98% power, an NRC resident inspector was in the control room area to observe a planned plant evolution. Upon entering the control room, it was not immediately apparent if the required number of SROs were in the control room area. The NRC inspector questioned the Unit 3 CRS, after his return to the control room, about shift manning requirements. In response, Edison reviewed the TS requirements and interviewed the SROs on shift at that time.

Edison subsequently determined that both onshift CRSs had been outside the TS defined control room area and had met at the work authorization control (WAC) desk to discuss a planned work activity for a few minutes (See attachment 2). The CRS holding the control room command function had remained in the vicinity of the WAC desk during this period. The WAC desk is located outside the control room area as defined by the current TS by a few feet, but within "audible range" of the Control room operators. Because the SS was touring the plant and was not in the control room area, the manning requirements of the TS 6.2.2 were not satisfied for a few minutes. Edison is reporting this occurrence in accordance with 10CFR50.73(a)(2)(i).

CAUSE OF THE EVENT:

The onshift SROs did not have a clear understanding of the control room area boundaries as described in TS Figure 6.2-3 (attachment 1). The control room area boundary near the work authorization desk is an artificial boundary and is not visually marked. As a result, the CRSs did not realize that they had inadvertently stepped outside the TS defined control room area, and it was not immediately recognized that TS 6.2.2 had been violated (cognitive personnel error). The lack of an obvious boundary contributed to the misunderstanding of the actual boundary by the CRSs.

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CORRECTIVE ACTIONS:

All SSs have been coached by the Plant Superintendent regarding the CRA boundary and the actions required prior to leaving the CRA. The SS of each crew has coached the CRSs on their own shift on this subject.

Edison has revised administrative procedure SO123-0-30, "SHIFT MANNING," to clarify and place more restrictive administrative limits on the allowable movement of the SRO holding the Control Room Command Function about the Control room area. These restrictions are in agreement with the criteria stated in Regulatory Guide 1.114, Rev 2, section c.2.3 and are more restrictive than the requirements established by the TS. A preshift brief was given to each crew on the changes to SO123-0-30 to ensure all operators were aware of the CRA boundary and associated manning requirements.

SAFETY SIGNIFICANCE:

There was minimal safety significance to this event. Even though both CRSs were outside the TS designated control room area, the CRS holding the control room command function remained in audible range of the reactor operator as discussed in Regulatory Guide 1.114, Revision 2, section c.2.3, while he was outside the control room area. This guide states in part "The senior operator should have the flexibility to periodically move for a brief period of time to other parts of the control room, as long as the senior operator is at all times within the control room vital area and either in sight of or in the audible range of the reactor operator at the controls,...." The CRS who had accepted the control room command function from the SS, was cognizant of the attendant responsibilities and was capable of carrying out those responsibilities at all times.

ADDITIONAL INFORMATION:

In early 1984, Edison submitted a request (PCN-83) to the NRC to (among other items) revise TS Figure 6.2-3 to include the office area created during the first remodeling (See attachment 2). When the second remodeling occurred, and a wall separating two of the office areas was removed, the 1984 requested TS revision was still pending. However, due to higher priority licensing amendment requests, PCN-83 remained unreviewed through 1989, at which time, other elements in the PCN became outdated and it was withdrawn by Edison.

In 1992, Edison again submitted a request, PCN 364, to change the administrative section of the TS, including Figure 6.2-3. This submittal revised Figure 6.2-3 to include the 1984 revisions as well as additional changes to include more areas. Approval of PCN 364, was deferred because of the pending approval of PCN 299 which will implement the Technical Specification Improvement Program (TSIP). Under TSIP, many requirements, including Figure 6.2-3, will be relocated from the TS into a new document, the licensee controlled specifications. In light of the event reported in this LER, Edison has reviewed the current draft of the licensee controlled specification which would substitute for the existing specification upon implementation of TSIP. We have concluded that the area in which the two SROs met briefly to discuss plant work is appropriately included in the control room area; however, Edison has also decided that some of the additional areas

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requested in PCN 364 for inclusion into the CRA are not appropriate. This conclusion was discussed with the NRC Project Manager for Units 2 and 3, on November 1, 1994.

There have been two previous LERs that reported violations of the SRO manning requirements:

LER 1-90-013 reported an event in which the SS, who was fulfilling the position of an SRO with control room command function, briefly left the control room area without verifying that the CRS was in the control room area. The SS had left the Control room to brief the oncoming crew in the Technical Support Center (TSC), which is adjacent to and visible from the control room. The SS realized the CRS was not in the control room and returned within 3 minutes.

LER 1-92-002 reported an event similar to that in LER 90-013, in which the SS left the control room to attend the preshift brief being given by an SS trainee. In this instance, the SS realized the CRS was not in the control room and returned immediately after being outside the CRA for approximately 15 seconds.

Both of the Unit 1 events were caused by personnel error. Although personnel error is also responsible for the event reported in this LER, the Unit 1 events are different in that they were caused by the control room operators leaving the control room vital area through a key card controlled security door. For the event reported in this LER, the Units 2/3 CRSs never exited the control room vital area.

Additionally, at Unit 1 there is a physical boundary that establishes the control room area boundary which does not exist at portions of the Unit 2 and 3 control room area. For each of the events at Unit 1, the operator who left the control room knew they were leaving the control room area, and failed to ensure that a qualified person remained in the control room area. In the instance reported by this LER, it was not immediately apparent to the individuals involved that they had left the TS defined control room area.

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Attachment 1

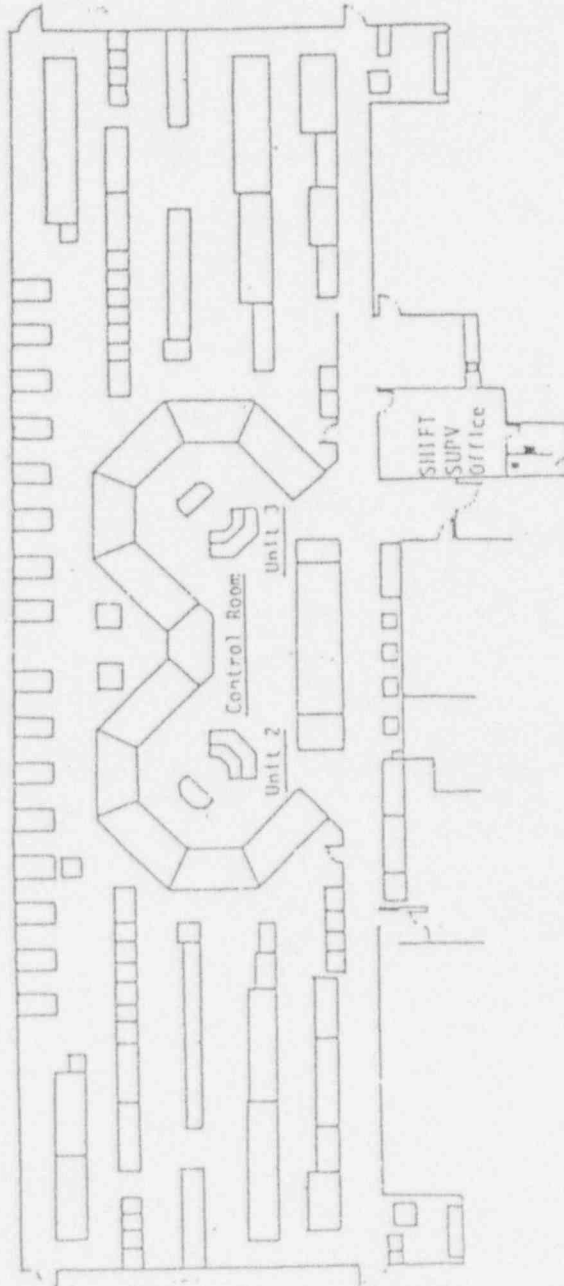


Figure 6.2-3
CONTROL ROOM AREA
SAN ONOFRE NUCLEAR GENERATING STATION - UNIT 2

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Attachment 2

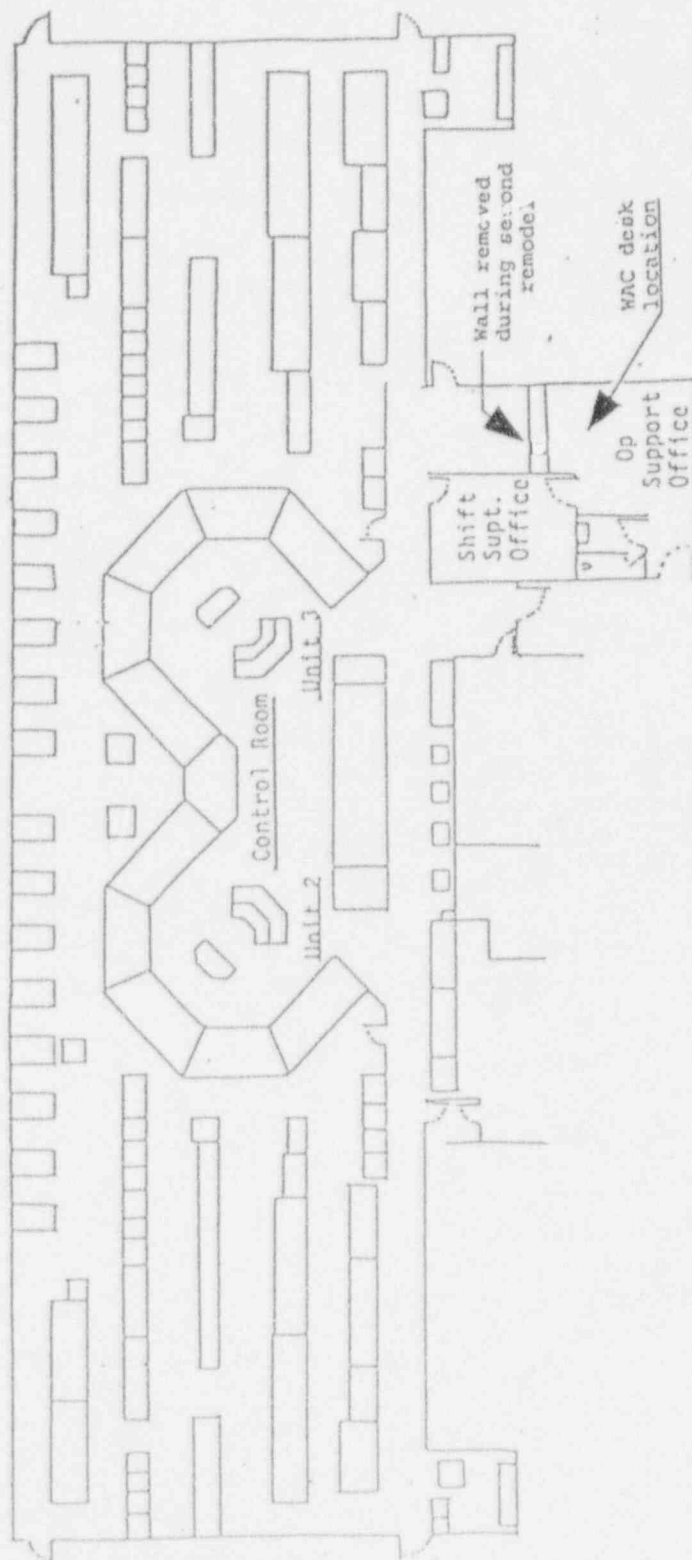


Figure 6.2-3

CONTROL ROOM AREA

SAN ONOFRE GENERATING STATION -- UNITS 2 & 3