

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3										DOCKET NUMBER (2) 0 5 0 0 0 3 6 2				PAGE (3) 1 OF 0 2					
TITLE (4) DELINQUENT SURVEILLANCE OF THE REACTOR PROTECTIVE SYSTEM																			
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)									
MONTH	DAY	YEAR	YEAR	SEQ. NUMBER	REV. NUMBER	MONTH	DAY	YEAR	FACILITY NAMES				DOCKET NUMBER(S)						
0 3	2 0	8 5	8 4	0 4 4	0 0	0 4	3 0	8 5					0 5 0 0 0 0						
OPERATING MODE (9) 1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																	
POWER LEVEL (10) 0 2 7		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, NRC Form 366A)					
		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 J. G. HAYNES, STATION MANAGER										TELEPHONE NUMBER AREA CODE 7 1 1 4 4 9 2 - 7 7 0 0									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																			
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs
SUPPLEMENTAL REPORT EXPECTED (14)														EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE)														X NO					

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

On 3/20/85, it was determined that Instrument and Test Procedure S023-II-3.1, "Plant Protection System Response Time Test for Channel A," did not require testing of CEAC Penalty Factors as required by Technical Specification Table 3.3-2, items 9(c) and 10(g). This procedure was used for response time testing of Channel A of the Unit 2 and 3 Reactor Protective Systems in October 1983 and February 1984, respectively.

The Unit 2 and 3 CEAC Penalty Factors were initially response time tested in January and October of 1982, respectively. The slowest response time recorded at that time was 0.148 seconds. Upon discovery of the deficient procedure, the CEAC Penalty Factors in Unit 2 and 3 were again response time tested and found to be less than the Technical Specification required response time of 0.53 seconds. The slowest response time was 0.160 seconds. For this reason, it is concluded that the CEAC Penalty Factor response times were in compliance during this period, and there was no safety significance to the condition.

Appropriate procedures will be revised to include this requirement. This omission was caused by inadequate review of the initial procedure. This is considered an isolated occurrence.

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LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)  SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3	DOCKET NUMBER (2)  0 5 0 0 0 3 6 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQ. NUMBER	REV. NUMBER			
		8 4	- 0 4 4	- 0 0	0 2	OF	0 2

TEXT (If more space is required, use additional NRC Form 366A's) (17)

The Reactor Protection System (RPS) (EIIS System Code JC) contains two Core Element Assembly Calculators (CEAC) (EIIS Component Code CPU) and four Core Protection Calculators (CPC) (EIIS Component Code CPU). Prior to initial startup, the 4 CPCs and 2 CEACs were initially tested using a startup test procedure and demonstrated operable for Units 2 and 3 in January and October 1982, respectively.

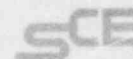
Following startup testing, individual surveillance procedures were then prepared for the routine rotating surveillance testing of the RPS Channels A, B, C and D. When the replacement procedures were being developed to response time test the two CEACs, implementing the rotating 18 month surveillance requirements of Technical Specification Table 3.3-2, items 9(c) and 10(g), it was determined that the CEAC tests should be incorporated into the RPS Channel B and C surveillance. The 2 CEACs are located in the CPC cabinets for RPS Channels B and C, respectively.

When the RPS surveillance procedures were written, it was not recognized during the review and approval process for the RPS Channel A surveillance, that CEAC 1 would not be tested until the Channel B test. Since the four RPS Channel surveillances and the two CEAC surveillances must each be conducted on an 18 month rotating intervals, failure to include CEAC testing in the Channel A and D RPS surveillances resulted in delinquent CEAC intervals.

On March 20, 1985, during preparation for the RPS Channel B surveillance, it was determined that the CEAC surveillances, due no later than July 1983 and August 1984 for Units 2 and 3, respectively, were delinquent. The CEAC Penalty Factors were tested and found to be less than the Technical Specification maximum of 0.53 seconds. Since the slowest initial CEAC Penalty Factor response time was 0.140 and the slowest current time is 0.160, we have concluded that the CEAC Penalty Factor response time was in compliance during this period, and there was no safety significance to the condition.

Appropriate procedures will be revised to correctly test CEAC Penalty Factors. There are seven procedures for Technical Specification Reactor Protective System and Engineered Safety Feature surveillances which involve a varying number of redundant channels within a system. Although this is considered an isolated occurrence, these seven surveillance procedures will be reviewed to confirm appropriate surveillance test frequencies.

*Southern California Edison Company*



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STATION MANAGER

April 30, 1985

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

Subject: Docket No. 50-362  
30-Day Report  
Licensee Event Report No. 84-044  
San Onofre Nuclear Generating Station, Unit 3

Pursuant to 10 CFR 50.73(a)(2)(i)(B), this submittal provides the required 30-day written Licensee Event Report (LER) involving a delinquent surveillance of the Reactor Protective System. This report was delayed in order to provide a complete response. Neither the health and safety of plant personnel nor the health and safety of the public was affected by this event.

If you require any additional information, please so advise.

Sincerely,

Enclosure: LER No. 84-044

cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 and 3)  
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)

J. B. Martin (Regional Administrator, USNRC Region V)

Institute of Nuclear Power Operations (INPO)

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