

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) INOPERABLE TURBINE PLANT AREA SUMP MONITOR 3RT-7821																
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 4	2 2	8 5	8 5	0 1 5	0 0	0 5	2 8	8 5					0 5 0 0 0 0			
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)														
1		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)		
POWER LEVEL (10)		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)		
1 0 0		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)				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 4 4 9 2 - 7 7 1 0 1 0						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC						
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO				

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

On April 22, 1985, at 0439 with Unit 3 at 100% power, Turbine Plant Area Sump Monitor (EIS Component Code RIT) 3RT-7821 was found to have been isolated since the completion of the 18 month surveillance on April 19, 1985. During this period, grab samples had not been taken at eight hour intervals in accordance with LCO 3.3.3.8, Action Statement 'b.'

For the 18 month surveillance, a Work Authorization Record (WAR) had been issued but upon completion of the surveillance, the WAR was closed without restoring the valve line-up to permit 3RT-7821 operation. This was caused by errors in completing the WAR.

Just prior to this incident, Management efforts were underway to identify and correct problems associated with completing documentation. A Special Order has been issued by the Plant Superintendent addressing this subject. In addition, applicable procedures will be revised to prevent repetition of this problem.

Daily samples collected from the same sump (required by surveillance 4.11.1.1.3) were counted and indicated no unusual activity releases during this period. Neither the health and safety of plant personnel nor the health and safety of the public was affected by this event.

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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 5	- 0 1 5	- 0 0	0 2	OF	0 2

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

On April 22, 1985, at 0439 with Unit 3 at 100% power, Turbine Plant Area Sump Monitor 3RT-7821 (EIIS Component Code RIT) was found isolated. The isolation valves were immediately opened, restoring the monitor to service. Although daily grab samples required by Surveillance Requirement 4.11.1.1.3 are taken from the sump, Limiting Condition for Operation (LCO) 3.3.3.8, which requires 8 hour grab samples when 3RT-7821 is inoperable, was not met for a 3 day period. Releases via this pathway were determined to be within limits based upon the daily grab samples.

A Work Authorization Record (WAR) to control work required to conduct the 18 month surveillance of 3RT-7821 was originally issued as an "approval." This WAR type does not require clearance tags. Later, when the governing Procedure S023-XXV-9.343 was issued, it replaced S023-II-9.343 for the 18 month surveillance and called for a "clearance" to be issued. A "clearance" requires that the affected component be valved out and that tags be placed on the isolation valves.

3RT-7821 was isolated and tags were placed, however, the operator completed the tagging without completing the required initials on the "Tag Installation" section of the WAR. Likewise, the "Verified by" blanks of the WAR Tag Installation Section were not initialed and, although the WAR continuation sheet was changed to indicate that a "clearance" had been issued versus the former "approval," the front sheet of the WAR was not changed to show this revision in WAR type.

Later, the WAR was changed back to an "approval" and, when the surveillance was completed, the WAR was closed. The isolation valves were not opened nor were the tags removed and verified. This resulted from two errors in completing the WAR:

- (1) The tag installation section of the WAR had not been initialed leading the subsequent shift to conclude, wrongly, that the tags had not been placed nor the isolation valves shut, and
- (2) The front page of the WAR did not indicate that a clearance had existed and, upon close-out of the WAR, the authorized Operator did not review all sheets of the WAR and identify the inconsistencies between the various sections of the WAR.

The Operators erred in not properly documenting the type and status of the WAR as the work progressed. Just prior to this, Management efforts were underway to identify and correct problems and errors associated with completing documentation. A Special Order has been issued by the Plant Superintendent addressing this subject. In addition, following this incident, procedural changes were identified which will prevent recurrence. These changes will clarify when a record can be changed and where this is prohibited. These guidelines will be incorporated into appropriate procedures including S023-0-13, "Work Authorizations," and S023-0-35, "Use of Procedures."

Since the daily grab samples did not indicate increased or abnormal sump activity, there were not reasonable or credible circumstances under which this event would have been more severe.

Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING STATION

P.O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

J. G. HAYNES
STATION MANAGER

May 28, 1985

SCE

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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. 85-015
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) for an occurrence involving the Radioactive Liquid Effluent Monitoring Instrumentation System. Neither the health and safety of plant personnel nor the health and safety of the public was affected by this event. This report was delayed in order to provide a complete response.

If you require any additional information, please so advise.

Sincerely,

J. G. Haynes

Enclosure: LER No. 85-015

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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