



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 20 1985

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REGION V

@ SONGS

Docket Nos. 50-206
50-361
and 50-362

MEMORANDUM FOR:

Dennis F. Kirsch, Acting Director
Division of Reactor Safety and Projects
Region V

FROM:

James G. Partlow, Director
Division of Inspection Programs
Office of Inspection and Enforcement

SUBJECT:

SAN ONOFRE INSPECTION - POTENTIAL ENFORCEMENT FINDINGS

The enclosed Potential Enforcement Findings (PEFs) (referred to as Unresolved Items in Inspection Report 50-206/85-12; 50-361/85-09; 50-362/85-08) were found during the recent inspection at San Onofre Nuclear Generating Station (SONGS) and are provided for your followup. It is requested that you add these PEFs to the SONGS Open Item List (Region V Tracking System) and dispose of them as Unresolved Items.

The following is a summary of the enclosed PEFs:

- a. Item 50-206/85-12-01. Failure to correctly calculate the as-found leakage rate from containment during an integrated leak rate test.
- b. Item 50-361/85-09-03. Failure to post radiological control areas properly.
- c. Item 50-361/85-09-04. Failure to align properly power supply breakers for trains A and B containment spray header isolation valves.
- d. Item 50-361/85-09-07. Failure to conduct the 18-month battery surveillance for Class 1E batteries 2B007 and 2B008.
- e. Item 50-361/85-09-08. Failure to conduct performance tests on Units 2 and 3 batteries within two years of being placed in service.
- f. Item 362/85-08-01. Failure to conduct required trip test on the Unit 3 steam-driven AFW pump turbine.

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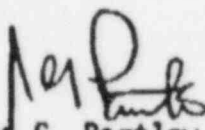
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Dennis F. Kirsch

- 2 -

- g. Item 50-362/85-08-02. Failure to test properly the Unit 3 AFW pumps.

We request that you keep us informed of your followup on the PEFs. If you have any questions, please contact me or the team leader, L. J. Callan.


James G. Partlow, Director
Division of Inspection Programs
Office of Inspection and Enforcement

Enclosure:
Potential Enforcement Findings

cc w/enclosure:
J. M. Taylor, IE
J. Axelrad, IE

Enclosure

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 1 DOCKET NO. 50-206 DATE 4/2/85
AREA CONTAINMENT INTEGRATED LEAK TEST ITEM NO. 206/85-12-01
INSPECTOR S.A. MCNEIL TEAM LEADER L.J. CALLAN

REQUIREMENT:

10 CFR Part 50, Appendix J, paragraph III.A.3, requires that all containment integrated leak rate (Type A) tests be conducted in accordance with the provisions of ANSI N45.4-1972.

Paragraph 4.2 of ANSI N45.4-1972 states that a periodic containment integrated leak rate test (CILRT) should be conducted before any preparatory repairs are made in order to disclose the normal state of repair (as-found condition) of the containment structure.

10 CFR Part 50, Appendix J, paragraph III.A.1, states that in the event of repairs and/or adjustments (RAs) being made to the containment structure prior to performing the final CILRT, the change in the local leak rate due to these RAs shall be determined and that the overall integrated leakage rate shall be determined from the local leak rate test (LLRT) results and the CILRT result.

FINDING:

Contrary to the above, the licensee performed local leak rate tests (Type C) and penetration repairs prior to performing the CILRT but failed to add the pre-repair and post-repair differential leakage rates to obtain an as-found value for containment leakage. Specifically, pre-CILRT repair work was conducted on the following valve sets: POY-10 and EYS-313, CV-104 and CV-105, CV-953 and CV-992, CV-532 and GNI-102 and CV-957 and CV-962. The differential leakage rates for these valve sets was not factored into the CILRT to determine the as-found condition. Failure of the licensee to calculate the as-found leakage rate from containment resulted in the licensee not realizing that they had failed the Type A test in the as-found condition.

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 2 DOCKET NO. 50-362 DATE 4/1/85
AREA RADIOLOGICAL POSTING ITEM NO. 361/85-09-03
INSPECTOR S.A. MCNEIL TEAM LEADER L.J. CALLAN

REQUIREMENT:

Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented and maintained for the procedures recommended in Appendix "A" of Regulatory Guide 1.33.

Appendix "A" of Regulatory Guide 1.33 section 7.e states that these procedures shall include those necessary for radiation protection in access control to radiation areas and in contamination control.

Procedure S0123-VII-7.4, Rev 5, "Posting and Access Control," requires that all signs and/or barricades for radiological area designation be conspicuously displayed (generally at waist to shoulder level) at all entrance locations to an area.

FINDING:

Contrary to the above, the posting of radiological control areas was deficient in the following instances:

- a. At the storage area adjacent to the Unit 2 makeup water demineralizer, the radiological postings had apparently been knocked to the ground and several pieces of radioactive material were stowed outside the area.
- b. At the Unit 2 outfall, the radiological posting was obscured at the most accessible entrance, allowing personnel to enter the area without being made aware of the potential for contamination.

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 2

DOCKET NO. 50-361

DATE 4/1/85

AREA BATTERY OPERATION AND SURVEILLANCE

ITEM NO. 361/85-09-07

INSPECTOR D.J. SULLIVAN, JR

TEAM LEADER L.J. CALLAN

REQUIREMENT:

Technical Specification (TS) 3.8.2.1.d requires that a battery service test be conducted on Class 1E batteries every 18 months to demonstrate that battery capacity is adequate to supply and maintain emergency loads.

FINDING:

Contrary to the above, the 18-month battery surveillance procedure (S023-I-2-2.15) for batteries 2B007 and 2B008 was not conducted from the time the batteries were placed in service (February 1982) until December 1984 and February 1985 respectively. The approximate period for which operability remained undemonstrated was:

- ° Battery 2B007 August 1983 to December 1984
- ° Battery 2B008 August 1983 to February 1985

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNITS 2 and 3 DOCKET NO. 50-361 DATE 4/1/85
AREA BATTERY OPERATION AND SURVEILLANCE ITEM NO. 361/85-09-08
INSPECTOR D.J. SULLIVAN, JR TEAM LEADER L.J. CALLAN

REQUIREMENT

The San Onofre Unit 2 Final Safety Analysis Report, Updated, (FSAR), paragraph 8.3.2.2.1.8.d., requires a performance test of battery capacity within the first two years of service. This requirement is separate from the requirement for an acceptance test (FSAR 8.3.2.2.1.8B) and the data provides a baseline for the 60-month surveillance test (TS 4.8.2.1.e), described by Procedure S023-1-2.16.

FINDING:

In deviation from the above, performance tests were not conducted on the San Onofre Units 2 and 3 batteries within two years of being placed in service.

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 3 DOCKET NO. 50-362 DATE 4/2/85
AREA AUXILIARY FEEDWATER (AFW) SURVEILLANCE REVIEW ITEM NO. 362/85-08-01
INSPECTOR S.A. MCNEIL TEAM LEADER L.J. CALLAN

REQUIREMENT:

For operation in modes 1, 2, or 3 Technical Specification (TS) 4.7.1.2.a.4 requires that each AFW pump be demonstrated operable at least once every 31 days by verifying that the AFW piping is full of water.

FINDING:

Contrary to the above, this monthly AFW operability surveillance was not performed for the months of November, December 1984 and January 1985. Throughout this period, Unit 3 operated in modes 1, 2, or 3.

REQUIREMENT:

T.S. 6.8.1.c requires that written procedures shall be established, implemented and maintained for surveillance and test activities of safety related equipment.

Limiting Condition of Operation (LCO) 3.7.1.2 states that at least three independent AFW pumps and associated flow paths must be operable while in mode 1, 2 or 3. Step 6.1 of Procedure S023-3-3.16, "Auxiliary Feedwater Monthly Tests" requires the monthly performance of a trip test on the steam driven AFW pump turbine in order to comply with LCO 3.7.1.2.

FINDING:

Contrary to the above, this trip test was not performed for the months of November 1984, December 1984, and January 1985. Throughout this period, Unit 3 operated in mode 1, 2, or 3.

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 3 DOCKET NO. 50-362 DATE 4/2/85
AREA AUXILIARY FEEDWATER (AFW) SURVEILLANCE REVIEW ITEM NO. 362/85-08-02
INSPECTOR S.A. MCNEIL TEAM LEADER L.J. CALLAN

REQUIREMENT:

Technical Specification (TS) 6.8.1.c requires that written procedures shall be established, implemented and maintained for surveillance and test activities of safety related equipment. TS 4.7.1.2 requires that the AFW system shall be demonstrated operable prior to entering mode 2 following each cold shutdown by performing a flow test.

Surveillance test procedure S023-3-3.16.2, "Auxiliary Feedwater Flow Test", which was established to meet the requirements of TS 4.7.1.2.2, states that this test shall be performed for all AFW pumps while in mode 3 and RCS test temperature (no load Tavg) shall be at least 544°F prior to testing the steam driven AFW pump.

FINDING:

Contrary to the above, the electrically driven AFW pumps were tested in March and November 1984 while in mode 4 and in December 1984 the steam driven AFW pump was tested with Tavg at less than 400°F.



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PLEASE FAX
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Docket Nos. 50-206
50-361
and 50-362

MEMORANDUM FOR: Dennis F. Kirsch, Acting Director
Division of Reactor Safety and Projects
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FROM: James G. Partlow, Director
Division of Inspection Programs
Office of Inspection and Enforcement

SUBJECT: SAN ONOFRE INSPECTION - POTENTIAL ENFORCEMENT FINDINGS

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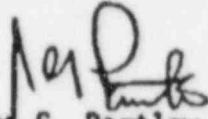
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- c. Item 50-361/85-09-04. Failure to align properly power supply breakers for trains A and B containment spray header isolation valves.
- d. Item 50-361/85-09-07. Failure to conduct the 18-month battery surveillance for Class 1E batteries 2B007 and 2B008.
- e. Item 50-361/85-09-08. Failure to conduct performance tests on Units 2 and 3 batteries within two years of being placed in service.
- f. Item 362/85-08-01. Failure to conduct required trip test on the Unit 3 steam-driven AFW pump turbine.

Dennis F. Kirsch

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- g. Item 50-362/85-08-02. Failure to test properly the Unit 3 AFW pumps.

We request that you keep us informed of your followup on the PEFs. If you have any questions, please contact me or the team leader, L. J. Callan.


James G. Partlow, Director
Division of Inspection Programs
Office of Inspection and Enforcement

Enclosure:
Potential Enforcement Findings

cc w/enclosure:
J. M. Taylor, IE
J. Axelrad, IE

Enclosure

POTENTIAL ENFORCEMENT FINDING

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AREA CONTAINMENT INTEGRATED LEAK TEST ITEM NO. 206/85-12-01
INSPECTOR S.A. MCNEIL TEAM LEADER L.J. CALLAN

REQUIREMENT:

10 CFR Part 50, Appendix J, paragraph III.A.3, requires that all containment integrated leak rate (Type A) tests be conducted in accordance with the provisions of ANSI N45.4-1972.

Paragraph 4.2 of ANSI N45.4-1972 states that a periodic containment integrated leak rate test (CILRT) should be conducted before any preparatory repairs are made in order to disclose the normal state of repair (as-found condition) of the containment structure.

10 CFR Part 50, Appendix J, paragraph III.A.1, states that in the event of repairs and/or adjustments (RAs) being made to the containment structure prior to performing the final CILRT, the change in the local leak rate due to these RAs shall be determined and that the overall integrated leakage rate shall be determined from the local leak rate test (LLRT) results and the CILRT result.

FINDING:

Contrary to the above, the licensee performed local leak rate tests (Type C) and penetration repairs prior to performing the CILRT but failed to add the pre-repair and post-repair differential leakage rates to obtain an as-found value for containment leakage. Specifically, pre-CILRT repair work was conducted on the following valve sets: POV-10 and EVS-313, CV-104 and CV-105, CV-953 and CV-992, CV-532 and GNI-102 and CV-957 and CV-962. The differential leakage rates for these valve sets was not factored into the CILRT to determine the as-found condition. Failure of the licensee to calculate the as-found leakage rate from containment resulted in the licensee not realizing that they had failed the Type A test in the as-found condition.

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 2 DOCKET NO. 50-362 DATE 4/1/85
AREA RADIOLOGICAL POSTING ITEM NO. 361/85-09-03
INSPECTOR S.A. MCNEIL TEAM LEADER L.J. CALLAN

REQUIREMENT:

Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented and maintained for the procedures recommended in Appendix "A" of Regulatory Guide 1.33.

Appendix "A" of Regulatory Guide 1.33 section 7.e states that these procedures shall include those necessary for radiation protection in access control to radiation areas and in contamination control.

Procedure S0123-VII-7.4, Rev 6, "Posting and Access Control," requires that all signs and/or barricades for radiological area designation be conspicuously displayed (generally at waist to shoulder level) at all entrance locations to an area.

FINDING:

Contrary to the above, the posting of radiological control areas was deficient in the following instances:

- a. At the storage area adjacent to the Unit 2 makeup water demineralizer, the radiological postings had apparently been knocked to the ground and several pieces of radioactive material were stowed outside the area.
- b. At the Unit 2 outfall, the radiological posting was obscured at the most accessible entrance, allowing personnel to enter the area without being made aware of the potential for contamination.

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 2 DOCKET NO. 50-361 DATE 4/1/85
AREA BATTERY OPERATION AND SURVEILLANCE ITEM NO. 361/85-09-07
INSPECTOR D.J. SULLIVAN, JR TEAM LEADER L.J. CALLAN

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FINDING:

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- Battery 2B007 August 1983 to December 1984
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FACILITY SAN ONOFRE UNITS 2 and 3 DOCKET NO. 50-361 DATE 4/1/85
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INSPECTOR D.J. SULLIVAN, JR TEAM LEADER L.J. CALLAN

REQUIREMENT

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FINDING:

In deviation from the above, performance tests were not conducted on the San Onofre Units 2 and 3 batteries within two years of being placed in service.

POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 3

DOCKET NO. 50-362

DATE 4/2/85

AREA AUXILIARY FEEDWATER (AFW) SURVEILLANCE REVIEW

ITEM NO. 362/85-08-01

INSPECTOR S.A. MCNEIL

TEAM LEADER L.J. CALLAN

REQUIREMENT:

For operation in modes 1, 2, or 3 Technical Specification (TS) 4.7.1.2.a.4 requires that each AFW pump be demonstrated operable at least once every 31 days by verifying that the AFW piping is full of water.

FINDING:

Contrary to the above, this monthly AFW operability surveillance was not performed for the months of November, December 1984 and January 1985. Throughout this period, Unit 3 operated in modes 1, 2, or 3.

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FINDING:

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POTENTIAL ENFORCEMENT FINDING

FACILITY SAN ONOFRE UNIT 3 DOCKET NO. 50-362 DATE 4/2/85
AREA AUXILIARY FEEDWATER (AFW) SURVEILLANCE REVIEW ITEM NO. 362/85-08-02
INSPECTOR S.A. MCNEIL TEAM LEADER L.J. CALLAN

REQUIREMENT:

Technical Specification (TS) 6.8.1.c requires that written procedures shall be established, implemented and maintained for surveillance and test activities of safety related equipment. TS 4.7.1.2.2 requires that the AFW system shall be demonstrated operable prior to entering mode 2 following each cold shutdown by performing a flow test.

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