

June 23, 2000

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

Subject: **Docket Nos. 50-361 and 50-362**
30-Day Report
Licensee Event Report No. 2000-007
San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

This submittal provides a 30-day Licensee Event Report (LER) for an occurrence involving verbatim application of Technical Specification (TS) bases to the performance of a TS surveillance. While this occurrence is applicable to both Units 2 and 3, a single report for Unit 2 is being submitted in accordance with Section 5.2.3(8) of NUREG-1022, Revision 1. Neither the health nor the safety of plant personnel or the public was affected by this occurrence.

Any actions listed are intended to ensure continued compliance with existing commitments as discussed in applicable licensing documents; this LER contains no new commitments. If you require any additional information, please so advise.

Sincerely,



Attachment: LER No. 2000-007

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3

NRC FORM 366 (MM-YYYY)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES MM/DD/YYYY Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If a document used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.																																																							
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)																																																									
FACILITY NAME (1) San Onofre Nuclear Generation Station (SONGS) Unit 2		DOCKET NUMBER (2) 05000-361																																																							
		PAGE (3) 1 of 4																																																							
TITLE (4) Valve Position verification required for surveillance 3.6.6.1.1 not implemented as specified in TS Bases																																																									
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="3">EVENT DATE (5)</th> <th colspan="3">LER NUMBER (6)</th> <th colspan="3">REPORT DATE (7)</th> <th colspan="2">OTHER FACILITIES INVOLVED (8)</th> </tr> <tr> <th>MONTH</th> <th>DAY</th> <th>YEAR</th> <th>YEAR</th> <th>SEQUENTIAL NUMBER</th> <th>REVISION NUMBER</th> <th>MONTH</th> <th>DAY</th> <th>YEAR</th> <th>FACILITY NAME</th> <th>DOCKET NUMBER</th> </tr> <tr> <td>6</td> <td>1</td> <td>2000</td> <td>2000</td> <td>-- 07 --</td> <td>00</td> <td>6</td> <td>23</td> <td>2000</td> <td>SONGS Unit 3</td> <td>05000-362</td> </tr> <tr> <td colspan="9"></td> <td>FACILITY NAME</td> <td>DOCKET NUMBER</td> </tr> <tr> <td colspan="9"></td> <td></td> <td></td> </tr> </table>			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 NAME	DOCKET NUMBER	6	1	2000	2000	-- 07 --	00	6	23	2000	SONGS Unit 3	05000-362										FACILITY NAME	DOCKET NUMBER											
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OPERATING MODE (9) 1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)																																																						
			20.2201(b)			20.2203(a)(2)(v)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)																																														
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			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A																																														
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)																																																

LICENSEE CONTACT FOR THIS LER (12)

NAME R. W. Krieger, Vice President, Nuclear Operations	TELEPHONE NUMBER (Include Area Code) 949-368-6255
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		
YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/>	NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On June 1, 2000 (event date), while preparing to perform the containment spray monthly surveillance, an Assistant Control Room Operator (ACO) questioned the adequacy of the method of valve position verification. The surveillance procedure (SO23-3-3.13) did not include specific guidance for performing the verification. A review of the Bases to SR 3.6.6.1.1 noted the requirement of verification "through a system walkdown." However, procedure (SO123-O-23.1) allows verification of valve position by a control board indicator walkdown. Subsequently, SCE concluded that "through a system walkdown" could be interpreted to require a local verification at the valve's physical location. Consequently, even though this discrepancy is administrative in nature, and it could not impact the operability of the system, SCE is reporting this condition in accordance with 10 CFR 50.73(a)(2)(i)(B) as a Technical Specification violation.

The phrase "through a system walkdown" was apparently inadvertently added in the Standard Technical Specifications and during the conversion to Technical Specification Improvement Program, SCE did not recognize the distinction between field walkdown and control room alignment walkdown.

SCE immediately conducted a field verification of valve positions (on both Units) including valves with remote position indication. The Bases to TS 3.6.3 and 3.6.6.1 were revised to delete the statement "through a system walkdown."

Using the NRC's current Significant Determination Process, this issue "screens-out" as an administrative issue not affecting operability, and consequently has "no color".

LICENSEE EVENT REPORT (LER)

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Unit 2
 Reactor Vendor: Combustion Engineering
 Mode: Mode 1 – Power Operation
 Power: 99.85 percent
 Temperature: 538.2 degrees F
 Pressure: 2259 psia

Unit 3
 Reactor Vendor: Combustion Engineering
 Mode: Mode 1 – Power Operation
 Power: 99.91 percent
 Temperature: 538.2 degrees F
 Pressure: 2259 psia

Background:

The Containment Spray System (CSS) {BE} consists of two separate trains of equal capacity, each capable of meeting the design bases. Each CSS includes a spray pump, spray headers, nozzles, valves, piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the RWST upon an ESF actuation signal and automatically transferring suction to the containment sump. Each train is powered from a separate ESF bus.

In August 1996, Southern California Edison (SCE) implemented new Technical Specifications (TS) by means of the Technical Specification Improvement Program (TSIP). Surveillance Requirement (SR) 4.6.2.1.a from TS 3/4.6.2.1 were transferred, essentially unchanged, to the improved TS on August 5, 1996, and renumbered to SR 3.6.6.1.1. Before then, the Bases to TS 3/4.6.2.1 did not specify the method to be used to verify every 31 days the position of valves in the CSS flow path.

After TSIP, the Bases to SR 3.6.6.1.1 state that "..... This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This SR does not require any testing or valve manipulation. Rather, it involves verifying, through a system walkdown, that those valves outside containment and capable of potentially being mispositioned are in the correct position."

Description of the Event:

On June 1, 2000 (event date), while preparing to perform the containment spray monthly surveillance, an Assistant Control Room Operator (ACO) questioned the adequacy of the method of valve position verification. The surveillance procedure (SO23-3-3.13) did not include specific guidance for performing the verification. A review of the Bases to SR 3.6.6.1.1 noted the requirement of verification "through a system walkdown." However, procedure (SO123-O-23.1) allows verification of valve position by a control board indicator walkdown. This procedure requirement has been in place prior to and following TSIP implementation.

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Subsequently, SCE concluded that "through a system walkdown" could be interpreted to require a local verification at the valve's physical location. Consequently, even though this discrepancy is administrative in nature, and it could not impact the operability of the system, SCE is reporting this condition in accordance with 10 CFR 50.73(a)(2)(i)(B) as a Technical Specification violation.

Cause of the Event:

During the development of the improved standard technical specification (STS), an apparent administrative error neglected to remove this method of position verification from the STS for each type of Pressurized Water Reactor (Combustion Engineering, Westinghouse, and Babcock and Wilcox). During the SONGS conversion to STS during TSIP, SCE did not recognize the distinction between field walkdown and control room alignment walkdown.

Corrective Actions:

- When this issue was first identified, SCE immediately conducted a field verification of valve positions (on both Units) including valves with remote position indication.
- A review of the TS, via an electronic word search, discovered that this same requirement is delineated in the Bases to TS 3.6.3, however, this did not result in a TS violation. Therefore, the Bases to TS 3.6.3 and 3.6.6.1 were revised to delete the statement "through a system walkdown."

Safety Significance:

All previous SR's performed via control board indication were adequate to ensure valves remained in their required position. Therefore, there is no safety significance to this occurrence.

This issue was evaluated using the NRC's current Significant Determination Process as documented in MC0609. The issue was determined to "screen out" as an administrative issue not affecting operability, and consequently has "no color".

Additional Information:

In the last three years, there was one report made involving verbatim TS compliance:

1. LER 1997-001-03, on May 9, 1997, reported cases where TS Surveillance Requirements (SR's) were not adequately implemented by surveillance procedures.

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Corrective actions for this LER included a complete verification that all TS SRs were accurately incorporated into plant procedures. That effort also did not recognize the subtle difference involving the method of valve position verification.