SOUTHERN CALIFORNIA
EDISON
An *EDISON INTERNATIONAL* Company

R. W. Krieger
Vice President
Nuclear Generation

September 8, 2000

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

Subject: **Docket No. 50-361 and 50-362**
30-Day Report
Licensee Event Report No. 2000-009
San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

This submittal provides a 30-day Licensee Event Report (LER) in accordance with 10CFR50.73(a)(2)(i) for missed Technical Specification Surveillances. While this occurrence is applicable to both Units 2 and 3, a single report for Unit 2 is being submitted in accordance with NUREG-1022, Rev. 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,

LER No. 2000-009

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

P. O. Box 128
San Clemente, CA 92674-0128
714-368-6255
Fax 714-368-6183

IE22

NRC FORM 366 (MM-YYYY) | U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

APPROVED BY OMB NO. 3150-0104 EXPIRES MM/DD/YYYY

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
San Onofre Nuclear Generation Station (SONGS) Unit 2	05000-361	1 of 3

TITLE (4)

Missed Technical Specification Surveillances on Loss of Voltage Signal (LOVS) Relays

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
									SONGS Unit 3	05000-362
08	11	2000	2000	-- 009 --	00	09	08	2000	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	1
POWER LEVEL (10)	100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
	20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
	20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
	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	TELEPHONE NUMBER (Include Area Code)
R. W. Krieger, Vice President, Nuclear Operations	949-368-6255

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)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

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

On 8/11/2000, during an NRC Inspection, it was identified that the testing procedures for timing the Loss of Voltage Signal (LOVS) circuitry did not include the 127F1X1 relay in the circuit. SCE realized that the procedures, as written, did not adequately ensure compliance with Surveillance Requirement (SR) 3.3.7.3 and SR 3.3.7.4. SCE declared a missed surveillance on both Units 2 and 3 Emergency Diesel Generators (EDGs), and entered the appropriate SR 3.0.3 24-hour action statement at 1440 PDT on 8/11/2000. SCE began efforts to test each of the Unit 2 and 3 EDGs; all EDGs were tested and declared operable by 2315 PDT on 8/11/2000 (within the 24 hours allowed by TS SR 3.0.3). This event was caused by an unclear definition of a LOVS channel which resulted in the omission of 127F1X1 from the test procedures. The safety significance of the missed LOVS circuit surveillances is negligible.

Plant:	San Onofre Nuclear Generation Station (SONGS) Units 2 and 3	
Discovery Date:	August 11, 2000	
Discovery Time:	1440 PDT	
	Unit 2	Unit 3
Reactor Vendor:	Combustion Engineering	Combustion Engineering
Mode:	Mode 1 – Power Operation	Mode 1 – Power Operation
Power:	100 percent	100 percent

BACKGROUND:

The San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 4160-volt Class IE power system [EB] is protected from a loss of bus voltage by the undervoltage protection system [JE]. The undervoltage protection system generates a Loss Of Voltage Signal (LOVS) in the event a loss of voltage occurs. Four undervoltage relays [27] (one per channel) are provided on each of two 4160-volt Class IE buses (for each of Units 2 and 3) for the purpose of detection of a degraded grid voltage condition or a loss of bus voltage.

Technical Specification Surveillance Requirement 3.3.7.3 requires, in part, a LOVS channel calibration to ensure relay actuation times between 0.95 and 1.05 seconds every 24 months. SR 3.3.7.4 requires SCE to verify the response time of required LOVS channels is within 1.05 seconds on a 24 month staggered test basis.

DESCRIPTION OF THE EVENT:

On August 11, 2000, during an NRC Inspection, it was identified that the testing procedures for timing the LOVS circuitry did not include the 127F1X1 relay in the circuit (AR 000800580). SCE realized that the procedures, as written, did not adequately ensure compliance with SR 3.3.7.3 and SR 3.3.7.4. Thus, SCE is providing this LER in accordance with 10CFR50.73(a)(2)(i).

CAUSE OF THE EVENT:

In August 1996, TS SR 3.3.7.3 and 3.3.7.4 were modified as a result of Improved Technical Specifications (TSIP). During the implementation of the TSIP SRs, SCE identified that the surveillance of record was not in compliance with the new requirements (see Additional Information). Corrective actions included updating the design basis information to provide the current acceptance criteria. The design basis documentation was modified to include the following text:

> "Adjust time delay 127F1 relay such that the time delay of the entire LOVS channel up to and including 127F1X1 and 127F1X2 is 1.00 +/- 0.05 seconds. A LOVS channel consists of relay 127F1 and auxiliary relays 127F1X3 and 127F1X1/127F1X2 in series. This timing requirement also applies to the LOVS channels associated with relays 127F2, 127F3, and 127F4."

During the investigation of the event reported herein, SCE recognized that this definition, specifically the use of the "/" in the expression "127F1X1/127F1X2", was unclear and was misinterpreted by site personnel. As a result, the test procedures omitted the steps to test 127F1X1.

CORRECTIVE ACTIONS:

SCE declared a missed surveillance on both Units 2 and 3 EDGs, and entered the appropriate SR 3.0.3 24-hour action statement at 1440 PDT on August 11, 2000. On August 11, 2000, SCE began efforts to test each of the Unit 2 and 3 EDGs. All EDGs were tested and declared operable by 2315 PDT on August 11, 2000 (within the 24 hours allowed by TS SR 3.0.3).

This event will be reviewed with appropriate personnel, to emphasize the importance of communications in developing requirements for changes to plant programs.

SAFETY SIGNIFICANCE:

The safety significance of the missed LOVS circuit surveillances is negligible due to (1) the other testing which demonstrated functionality of the overall circuitry and (2) plant specific analyses which demonstrate acceptable as-found results.

This issue was evaluated using NRC Manual Chapter 0609 for the Significance Determination Process (SDP) and this issue screens as "green."

ADDITIONAL INFORMATION:

During the implementation of the Improved Technical Specifications (TSIP), SCE changed the requirements from ensuring that the LOVS function met the timing requirements to each channel meeting the timing requirements. Thus, upon TSIP implementation, SCE did not have a surveillance of record demonstrating the actual response time for the affected relays in the LOVS circuitry. This occurrence was reported in LER 2-1997-001, Rev. 3, "Surveillances Not Current Upon Improved Technical Specification Implementation."

Also, as part of the corrective actions for the event identified in LER 2-1997-001, Rev. 3, a corrective action followup was performed to ensure the adequacy of the corrective actions. This followup did not identify the discrepancy reported herein.

SCE has not reported any additional instances of a missed surveillance on LOVS in the last three years.