

November 14, 2008

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555-0001

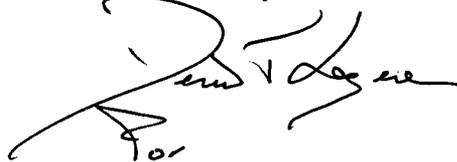
Subject: **Docket No. 50-361**
Licensee Event Report No. 2008-007
San Onofre Nuclear Generating Station, Unit 2

Dear Sir or Madam:

In compliance with 10CFR50.73(a)(2)(i)(B), this submittal provides Licensee Event Report (LER) 2008-007 to report a past practice which resulted in missed Technical Specification surveillances. Neither the health nor the safety of plant personnel or the public was affected by this occurrence.

If you require any additional information, please contact me.

Sincerely,



Albert R. Hochevar
Station Manager

Unit 2 LER No. 2008-007

cc: E. E. Collins, NRC Regional Administrator, Region IV
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 & 3

IE22
NRR

NRC FORM 366 (9-2007)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB: NO. 3150-0104 Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.	EXPIRES: 08/31/2010
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)			

1. FACILITY NAME San Onofre Nuclear Generating Station Unit 2	2. DOCKET NUMBER 05000-361	3. PAGE 1 OF 3
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4. TITLE
 Failure to comply with TS Surveillance Requirement Completion Time

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
08	22	2008	2008-007-00			11	14	2008	SONGS Unit 3	05000-362
									FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE	1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)								
10. POWER LEVEL	99	20.2201(b)			20.2203(a)(3)(ii)			50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)
		20.2201(d)			20.2203(a)(4)			50.73(a)(2)(iii)		50.73(a)(2)(x)
		20.2203(a)(1)			50.36(c)(1)(i)(A)			50.73(a)(2)(iv)(A)		73.71(a)(4)
		20.2203(a)(2)(i)			50.36(c)(1)(ii)(A)			50.73(a)(2)(v)(A)		73.71(a)(5)
		20.2203(a)(2)(ii)			50.36(c)(2)			50.73(a)(2)(v)(B)		OTHER Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iii)			50.46(a)(3)(ii)			50.73(a)(2)(v)(C)		
		20.2203(a)(2)(iv)			50.73(a)(2)(i)(A)			50.73(a)(2)(v)(D)		
		20.2203(a)(2)(v)			x			50.73(a)(2)(i)(B)		
		20.2203(a)(2)(vi)			50.73(a)(2)(i)(C)			50.73(a)(2)(viii)(A)		
20.2203(a)(3)(i)			50.73(a)(2)(ii)(A)			50.73(a)(2)(viii)(B)				

12. LICENSEE CONTACT FOR THIS LER

NAME Albert R. Hochevar, Station Manager	TELEPHONE NUMBER (Include Area Code) 949-368-9275
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
				N					

14. SUPPLEMENTAL REPORT EXPECTED				15. EXPECTED SUBMISSION DATE					
YES (If yes, complete EXPECTED SUBMISSION DATE)				X	NO		MONTH	DAY	YEAR

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

On 09/18/2008, SCE identified a practice that did not satisfy a Technical Specification (TS) Condition requirement. TS 3.8.1, Condition B, requires surveillance requirement (SR) 3.8.1.1, AC Sources Verification, within 1 hour after declaring an Emergency Diesel Generator (EDG) inoperable, and once per 8 hours thereafter. In contrast, for planned periods of EDG inoperability, Operators (Licensed) performed SR 3.8.1.1 within 1 hour prior to declaring an EDG inoperable, and once per 8 hours thereafter. This practice has existed since initial plant startup, and was consistent with San Onofre Nuclear Generating Station (SONGS) original TS but not with SONGS Improved TS (implemented August 5, 1996).

This event was caused by an inadequate procedure that was inconsistent with the improved TS. For planned periods of EDG inoperability, the procedure directed Operators (Licensed) to perform SR 3.8.1.1 prior to declaring the EDG inoperable. This practice, although prudent, is inconsistent with TS 1.3, Completion Time, which specifies that completion time begins at the time the condition is entered (i.e., the EDG is declared inoperable).

The applicable SR 3.8.1.1 implementation procedure has been revised to clearly specify the SR must be performed within 1 hour after declaring the equipment inoperable. SCE reviewed other TS SRs and found no similar examples.

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Plant: San Onofre Nuclear Generating Station (SONGS) Unit 2
 Event Date: August 22, 2008
 Reactor Vendor: Combustion Engineering
 Mode: Mode 1 – Power Operation
 Power: 99 percent

Description of Event

San Onofre Unit 2 has two Emergency Diesel Generators (EDGs) [EK] to provide emergency AC power if normal AC power is unavailable. Technical Specification (TS) 3.8.1 requires two EDGs be operable during Modes 1-4. If one EDG is inoperable, TS 3.8.1, Condition B, requires performance of Surveillance Requirement (SR) 3.8.1.1, AC Sources Verification, within 1 hour of entering Condition B, and once per 8 hours thereafter. TS 1.3, Completion Time, specifies that completion time begins at the time the condition is entered (i.e., when the EDG is declared inoperable).

On September 18, 2008 (date of discovery), during review of historical operator logs, SCE identified that past operating practice was not always in verbatim compliance with TS 1.3. Specifically, for planned periods of EDG inoperability, Operators (Utility, Licensed) performed SR 3.8.1.1 within 1 hour prior to declaring an EDG inoperable, and once per 8 hours thereafter. In these cases where an EDG was declared inoperable for planned maintenance, operators did not perform SR 3.8.1.1 within 1 hour after declaring the EDG inoperable. This practice existed since initial plant startup, and was consistent with SONGS original TS. However, it does not comply with SONGS Improved TS implemented on August 5, 1996. While this practice has existed since plant startup, the most recent occurrence of this noncompliance occurred on August 22, 2008 (event date).

Cause of the event

The cause of this event was an inadequate procedure which was not consistent with the improved TS. SONGS procedure SO23-3-3.23, Attachment 7, directed Operators (Utility, Licensed) to perform TS SR 3.8.1.1 prior to declaring an EDG inoperable. This practice, was, and is still considered conservative and has been in place since original plant startup. During implementation of the improved TS (implemented on August 5, 1996), SCE failed to recognize this practice was not in verbatim compliance with TS 1.3, Completion Time, which specifies that completion time begins at the time the condition is entered (i.e., at the time the EDG is declared inoperable).

Although Operators acted prudently in performing SR 3.8.1.1 prior to removing an EDG from service, SR 3.8.1.1 must also be performed within 1 hour after declaring the EDG inoperable in order to be in verbatim compliance with TS 1.3.

Completed Corrective Actions

The applicable SR 3.8.1.1 implementing procedure, SO23-3-3.23, Attachment 7, "AC Sources Verification," was revised on October 10, 2008, to clearly specify the SR must be performed within 1 hour after declaring an EDG inoperable.

SCE reviewed other TS SRs and found no similar examples.

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Planned Corrective Actions

SO23-2-13, "Diesel Generator Operation," is being revised to clearly specify SO23-3-3.23, Attachment 7, must be performed within 1 hour after removing an EDG from service.

A formal cause evaluation is currently being conducted. This LER will be updated if the cause evaluation reveals any new significant causes or corrective actions.

Safety Significance

SR 3.8.1.1 was successfully completed within 1 hour prior to declaring an EDG inoperable and also once per 8 hours after entering TS 3.8.1, Condition B. SCE concludes that, while this practice was not in verbatim compliance with the TS, there was no safety significance to this event.

Previous Occurrences

LERs 2-1996-009 and 2-1997-001 describe historical examples of failure to adequately implement Improved TS SRs.