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April 3, 2009

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

Subject: **Docket No. 50-361**
Licensee Event Report No. 2008-008-01
San Onofre Nuclear Generating Station, Unit 2

Dear Sir or Madam:

This submittal provides an update to Licensee Event Report (LER) 2008-008-00, which reported a missed Technical Specification surveillance. The revision updates the cause of the event based on a completed cause evaluation, and corrects a statement previously provided regarding the extent of condition. 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. 2008-008-01

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

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NRR

1. FACILITY NAME San Onofre Nuclear Generating Station (SONGS) Unit 2	2. DOCKET NUMBER 05000-361	3. PAGE 1 OF 3
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4. TITLE
Missed Technical Specification Surveillance Requirement on Spare Station Battery B00X

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
07	15	2008	2008-008-01			4	03	2009		

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)	50.73(a)(2)(vii)	
		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 A. 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	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
				N					

14. SUPPLEMENTAL REPORT EXPECTED

YES (If yes, complete EXPECTED SUBMISSION DATE)	X	NO	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
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16. ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On October 23, 2008, SCE identified that spare 125 VDC Station Battery B00X did not have all current completed Technical Specification (TS) Surveillance Requirements (SR) when it was put in-service from July 15 – July 17, 2008. This resulted in a violation of TS Limiting Condition of Operation (LCO) 3.8.6 and 3.8.4. The applicable SR was successfully completed on B00X on July 26, 2008.

This event was caused by a combination of incorrect procedure use and failure to properly implement a transition plan for scheduling TS surveillance testing. SONGS personnel improperly made pen-and-ink changes to a surveillance Maintenance Order. On July 1, 2008, SONGS transitioned from the MOSAIC System to the new Enterprise Resource Planning (ERP) System which significantly changed the process for scheduling TS surveillances. Prior to the transition to ERP, a transition plan was developed to ensure surveillances were completed in accordance with the applicable schedule. This transition plan was not properly implemented, resulting in the missed SR for B00X.

SCE conducted an extent of condition review and identified other examples where the transition plan was not properly implemented resulting in other missed TS SRs. The other missed TS SRs were successfully completed after the 25% extension allowed by TS SR 3.0.2 (i.e., 1.25 times the required surveillance interval), but did not result in additional reportable TS violations.

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Plant: San Onofre Nuclear Generating Station (SONGS) Unit 2
 Event Date: July 15, 2008
 Reactor Vendor: Combustion Engineering
 Mode: Mode 1 – Power Operation
 Power: 99 percent

Description of Event

San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 has eight Class 1E 125 VDC Station Batteries; 4 for each unit. SONGS utilizes a fully qualified spare 125 VDC battery (B00X) as a substitute battery during replacement and testing of existing Class 1E 125 VDC Station Batteries [EJ]. B00X can be utilized as a temporary spare for the existing station batteries in both Units 2 and 3, and, in order to be declared operable, is subject to the same Technical Specification (TS) Surveillance Requirements (SR) as the existing installed station batteries.

TS 3.8.4, "DC Sources – Operating," delineates the Limiting Condition for Operation (LCO), Actions, and SRs associated with the four trains of DC electrical power subsystems. TS 3.8.4.A requires that with one battery inoperable, the associated DC electrical power subsystem must be restored to operable status within two hours. If TS 3.8.4.A is not met, TS 3.8.4.B requires that the plant be placed in Mode 3 within 6 hours, and in Mode 5 within 36 hours.

TS 3.8.6, "Battery Cell Parameters," delineates the applicable LCO, Actions, and SR's associated with the 125 VDC Station Batteries. To satisfy the LCO, in-service batteries must be current on SRs 3.8.6.1, 3.8.6.2 and 3.8.6.3. SR 3.8.6.2 is a quarterly surveillance that verifies battery cell parameters meet applicable limits specified in TS Table 3.8.6-1, "Battery Surveillance Requirements."

On July 15, 2008 (event date), at about 1403 PDT, to allow work on station battery 2B008, station battery B00X was declared operable and placed in-service. On July 17, 2008, at approximately 1424 PDT, 2B008 was returned to service and B00X was removed from service. On October 23, 2008 (discovery date), SCE identified that when B00X was placed in-service on July 15, 2008, it did not have a current quarterly surveillance for SR 3.8.6.2. Consequently, LCOs 3.8.6 and 3.8.4 were unknowingly violated when B00X was placed in-service on July 15, 2008. The required quarterly surveillance on B00X was successfully performed on July 26, 2008.

Cause of the event

This event was caused by a combination of incorrect procedure use and failure to properly implement a transition plan for scheduling TS surveillances. A quarterly surveillance was improperly pen-and-ink modified to a weekly surveillance. Using this modified surveillance procedure, workers performed the weekly surveillance but the results were recorded as a completed quarterly surveillance. On July 1, 2008, SONGS transitioned from the MOSAIC System (i.e., SONGS tool for tracking work and Corrective Action Program issues) to the new ERP System which significantly changed the process for scheduling TS surveillance testing. Prior to the transition to ERP, a transition plan was developed to ensure surveillance testing was

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completed in accordance with the prescribed schedule and TS requirements. This transition plan was not properly implemented. The combination of the inappropriate pen-and-ink change and the failure to properly implement the transition plan resulted in the missed TS SR for B00X.

Corrective Actions

Completed Corrective Actions

The required B00X quarterly surveillance test satisfying SR 3.8.6.2 was successfully performed on July 26, 2008.

An extent of condition evaluation was performed which identified other examples where SRs were not completed as scheduled. The other missed SRs were successfully completed after the 25% extension (i.e., 1.25 times the required surveillance interval) allowed by TS SR 3.0.2, but did not result in additional reportable TS violations.

Individuals involved in making and approving the pen-and-ink change to the surveillance Maintenance Order were coached on complying with the applicable procedure requirements.

Planned Corrective Actions

SCE is incorporating lessons learned from this event into the Maintenance training program.

Safety Significance

SR 3.8.6.2 was successfully completed on B00X on July 26, 2008. Consequently, SCE concludes that there was no safety significance to this event.