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Douglas R. Bauder
Site Vice President & Station Manager
San Onofre Nuclear Generating Station

10 CFR 50.73 (a)(2)(i)(B)

September 3, 2010

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

Subject: **Docket No. 50-361 and 50-362**
Licensee Event Report No. 2010-003
San Onofre Nuclear Generating Station, Units 2 and 3

Dear Sir or Madam:

This submittal provides Licensee Event Report (LER) 2-2010-003 to report a conflict in Technical Specification (TS) 3.6.3, caused by a typographical error and resulted in a TS Violation.

Neither the health nor safety of plant personnel or the public was affected by this occurrence.

If you require any additional information, please contact me.

Sincerely,

Units 2 and 3 LER No. 2010-003

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

NRC FORM 366 (9-2007)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB: NO. 3150-0104	EXPIRES: 08/31/2010
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)		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.	

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
San Onofre Nuclear Generating Station Unit 2	05000-361	1 OF 3

4. TITLE
Typographical Error results in Conflicting TS Actions and TS Violation

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: SONGS Unit 3	DOCKET NUMBER: 05000-362
07	15	2010	2010	003	00	09	03	2010	FACILITY NAME:	DOCKET NUMBER:

9. OPERATING MODE	1
10. POWER LEVEL	100%

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)

	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	TELEPHONE NUMBER (Include Area Code)
Douglas R. Bauder, Site VP and Station Manager	949-368-9275

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

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

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

On July 15, 2010 [Event Date] during a review for a TS Upgrade Project, SCE discovered a conflict within TS 3.6.3. Condition A of this specification applies to penetration flow paths with two containment isolation valves and requires an inoperable valve to be isolated/closed within four hours. Because Condition A does not further specify the CIVs to which it applies, it can be inferred that Condition A applies to all CIVs. Conditions E and F apply to Groups D1 and D2, respectively, with the required action to place the inoperable valve in its ESF actuated position (open) with completion time specified as "In accordance with the applicable LCO pertaining to the system in which it is installed."

A review of control room logs confirmed that during the past three years, SCE has not applied the required actions of Condition A to Section D.1 and D.2 CIVs. SCE is reporting this TS conflict in accordance with 50.73(a)(2)(i)(B).

SCE issued a priority reading to control room operators instructing them to enter TS 3.6.3 Condition A (close CIV) for the LCS Group D1 or D2 valves whenever TS 3.6.3 Conditions E or F are entered.

The Technical Specification Upgrade Project will correct this error.

Plant:	San Onofre Nuclear Generating Station (SONGS) Unit 2
Event Date:	July 15, 2010
Reactor Vendor:	Combustion Engineering
Mode:	Mode 1 Power Operation
Power:	100 percent

Background:
The containment structure encloses the primary Nuclear Steam Supply System (NSSS) and provides a fission product barrier for Design Basis Accidents. Each containment penetration contains automatic and/or manual isolation valves that function to maintain the integrity of the containment as described in the Updated Final Safety Analysis Report (UFSAR) Section 6.2.4 "Containment Isolation System."

Technical Specification (TS) 3.6.3 "Containment Isolation Valves," provides the actions required when one or more containment isolation valves are discovered to be inoperable. The required actions for the different types of containment isolation valves are provided in separate "Conditions" with associated "Required Actions" and "Completion Times."

The list of the Containment Isolation Valves (CIV) is provided in the Licensee Controlled Specifications (LCS) Table 3.6.101-1 "Containment Isolation Valves" and are grouped by Section according to their type and function:

Section	Type/Function
A	Automatic Containment Isolation
B	Containment Purge Valves
C	Manual Valves
D1	Safety Injection System Valves
D2	Other required valves -charging system, emergency coolers, etc.
E	Other

Description of Event:
On July 15, 2010 [Event Date] during a review for a TS Upgrade Project, SCE discovered a conflict within TS 3.6.3. Condition A of this specification applies to penetration flow paths with two containment isolation valves and requires an inoperable valve to be isolated/closed within four hours. Because Condition A does not further specify the CIVs to which it applies, it can be inferred that Condition A applies to all CIVs. Conditions E and F apply to Groups D1 and D2, respectively, with the required action to place the inoperable valve in its ESF actuated position (open) with completion time specified as "In accordance with the applicable LCO pertaining to the system in which it is installed." Additionally, if a check valve is used to isolate the penetration in accordance with Condition A, then flow through the valve must be secured. Flow is not considered secured when the associated D.1 or D.2 valve has been secured in its ESFAS (open) position in accordance with Condition E or F.

As written, therefore, these two LCO Conditions direct SCE to take contradictory actions when a Category D.1 or D.2 CIV is inoperable. Condition A directs an inoperable valve to be closed; Conditions E and F direct an inoperable valve to be opened.

A review of control room logs confirmed that during the past three years, SCE has not applied the required actions of Condition A to Section D.1 and D.2 CIVs. SCE is reporting this TS conflict in accordance with 50.73(a)(2)(i)(B) "Any operation or condition which was prohibited by the plant's Technical Specifications."

1. FACILITY NAME	2. DOCKET NUMBER	6. LER NUMBER			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REV NO	
San Onofre Nuclear Generating Station (SONGS) Unit 2	05000-361	2010	--003 --	00	3 of 3

Cause of the Event:
This TS conflict was created when SCE implemented the SONGS Improved Technical Specifications in August 1996. SCE's TSIP submittal provided to the NRC by letter dated December 30, 1993 included a 'marked-up' version of the TS and a 'clean copy' of the TS. The 'marked-up' copy of TS 3.6.3, Condition A correctly included only Section A, B, C, and E CIVs. Due to an apparent typographical error (omitted text), the TS 'clean copy' did similarly include the Section A, B, C, and E CIV caveat. The NRC issued the Improved TS to SCE by letter dated February 9, 1996. The TS attached to that letter were based on the 'clean copy' version SCE had submitted to the NRC and were subsequently issued for use in the Control Room in August, 1996.

Corrective Actions:
SCE issued a priority reading to control room operators instructing them to enter TS 3.6.3 Condition A (close CIV) for the LCS Group D1 or D2 valves whenever TS 3.6.3 Conditions E or F are entered.

The Technical Specification Upgrade Project will correct this error.

Safety Significance:
There was no safety significance to this TS conflict. This reported TS violation was caused by a typographical error. Operation of the plant (not applying Condition A to D.1 and D.2 CIV) was consistent with the pre-TSIP TS and the intended version of the improved TS.

Additional Information:
In the past three years, there have not been other TS violations caused by conflicting TS Actions.