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AUTH. NAME AUTHOR AFFILIATION
MEDFORD, M. O. Southern California Edison Co.
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards rept re ECCS outages for 1986, per Section II.K.3.17 of NUREG-0660/0737. No further reporting of ECCS outages required since Generic Ltr 83-37 determined Tech Spec changes unnecessary. See Reports

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Southern California Edison Company

P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

M. O. MEDFORD
MANAGER OF NUCLEAR ENGINEERING
AND LICENSING

April 4, 1987

TELEPHONE
(818) 302-1749

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Pursuant to Section II.K.3.17 of NUREG-0660/0737, enclosed is the report concerning Emergency Core Cooling System (ECCS) outages for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. This report covers the period from January 1, 1986, to December 31, 1986, and includes the Unit ID, the ECCS component, cause of outage, duration of outage and corrective actions taken to return the component to operable status. For purposes of this report, the components of the ECCS have been subdivided into the following categories with SONGS system designators in parenthesis: Chemical and Volume Control System (Charging System only)(BGA), Boric Acid Mix Storage (components required for safety injection)(BGB), Safety Injection and Shutdown Cooling System (BHA), Refueling Water Storage Tanks (BHB), Containment Spray (BKA) and Emergency Diesel Generators (KJA and KJB).

The enclosed report contains 274 and 258 entries for SONGS 2 and 3, respectively. Since the majority of outage hours associated with the Equipment Qualification (EQ) entries involved Preventive Maintenance (PM) type activities, EQ entries were included in the PM entry totals for the purpose of summarizing outage causes. The outage causes can be summarized as follows:

UNIT 2

1.	Surveillance Testing (SV)	5.5%
2.	Corrective Maintenance (CM)	62.4%
3.	Preventive Maintenance (PM)	32.1%
4.	Design Change (DCP)	0.0%

UNIT 3

1.	Surveillance Testing (SV)	0.4%
2.	Corrective Maintenance (CM)	68.6%
3.	Preventive Maintenance (PM)	31.0%
4.	Design Change (DCP)	0.0%

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Most of the ECCS outages involved other than critical path work during plant shutdowns and therefore minimization of outage duration was not required. Since a portion of the time recorded as outage duration is a reflection of the administrative process of tracking and closing of equipment control documents, the reported outage durations, as a result, exaggerate the amount of time that ECCS systems were technically inoperable.

The 20% increase in Unit 2 total ECCS outage hours from 1985 to 1986 was primarily due to Motor Operated Valve Actuation Testing (MOVAT) in accordance with I.E. Bulletin 85-03. SONGS Unit 3 experienced a 24% decrease in total ECCS outage hours from 1985 to 1986.

This report has been submitted to provide the staff with a quantification of historical unreliability due to test and maintenance outages. This information was to be used to determine if a need existed for cumulative outage requirements in the Technical Specifications. Generic Letter 83-37, NUREG-0737 Technical Specifications, issued November 1, 1983, specified that the staff completed its review of the ECCS data provided by licensees, and determined that no changes in the Technical Specifications are required. Therefore, SCE concludes that with this submittal, no further reporting concerning ECCS outages for SONGS Units 2 and 3 are required pursuant to Section II.K.3.17 of NUREG-0660/0737.

If there are any questions regarding this report, please contact me.

Very truly yours,

M O Medford

Enclosure

cc: J. B. Martin (Regional Administrator, USNRC Region V)
F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 and 3)
H. Rood, (Project Manager, SONGS 2/3, USNRC, NRR)
Institute of Nuclear Power Operations (INPO)