

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (MMM-YYYY) 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 Estimated burden per response to comply with this mandatory information collection request 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Information and Records Management Branch (T-6 F33) U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If a document used to impose an 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, information collection.						
FACILITY NAME (1) San Onofre Nuclear Generating Station (SONGS) Unit 1				Docket Number (2) 05000-206		Page (3) 1 of 3				
TITLE (4): Radiological Effluent Technical Specification Flow Indicator Surveillance not Performed										
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
11	24	1998	1998	-- 005	-- 00	12	23	1998	SONGS Unit 2	05000-361
									SONGS Unit 3	05000-362
OPERATING MODE		n/a		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check One or More) (11)						
POWER LEVEL (10)		n/a		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 R.W. Krieger, Vice President, Nuclear Generation							TELEPHONE NUMBER (Include Area Code) 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 fifteen single-spaced typewritten lines (16))

On 10/6/98, flow verification on temporary auxiliary sampling equipment installed on the Unit 3 Condenser Air Ejector Wide Range Gas Monitor 3RT-7870 was not performed within the interval required by the Offsite Dose Calculation Manual (ODCM). During the subsequent investigation, SCE identified that, from 2/82 to 2/90, it had not implemented, verbatim, a compensatory action that was part of the TS. As authorized by the NRC in Operating License Amendments 83 and 73 for Units 2 and 3, respectively (issued 1/90), SCE removed this requirement from the TS. Consequently, on 11/24/98, SCE concluded that, until the Radiological Effluent Technical Specification (RETS) requirement was removed from the TS, SCE was not operating in verbatim compliance with the TS. Therefore, SCE is reporting this event pursuant to 10 CFR 50.73(a)(2)(i)(B). Although Unit 1 is permanently shutdown and defueled, SCE is including Unit 1 in this report for historical completeness.

Due to the wording in RETS, station personnel did not understand that the compensatory action for sampler flow estimates was independent of the status of the noble gas monitor or the particulate and iodine sampler. SCE will review this issue, determine the appropriate compensatory actions for out-of-service sampling components, and revise the ODCM accordingly.

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Plant: San Onofre Nuclear Generating Station Units 1, 2 and 3
 Reactor Vendor: Unit 1 - Westinghouse
 Units 2 and 3 - Combustion Engineering
 Discovery Date: November 24, 1998
 Discovery Time: 1522 PDST
 Mode: Unit 1 - Permanently Defueled
 Unit 2 - Mode 1, 100% Power Operation
 Unit 3 - Mode 1, 100% Power Operation

Background:

The original SONGS Units 2 and 3 Technical Specifications (TS) included specifications for the radioactive effluents (commonly referred to as RETS). The RETS for the gaseous effluent monitoring instrumentation included a compensatory action statement to estimate sample flow at a specified frequency if the sample flow rate measuring device was inoperable. As authorized by the NRC in Operating License Amendments 83 and 73 for Units 2 and 3, respectively (issued 1/90), SCE removed this requirement from the TS. This requirement was moved to the licensee-controlled Units 2 and 3 Offsite Dose Calculation Manual (ODCM).

10CFR20, 10CFR50, and the ODCM require SCE to obtain representative samples from all radioactive release points to:

- (i) ensure that the limits of 10 CFR 20 are not exceeded (radiation monitor setpoints); and
- (ii) be able to calculate the amount of curies released and any resultant dose to the public.

For airborne release points, specified instrumentation in standard RETS (NUREG 0472) consists of the radiation monitor, particulate and iodine sampling skid, sampler and discharge (or process) flow measuring devices. Compensatory actions for inoperable sampler flow measuring devices are also specified for the particulate and iodine sampler skids. The compensatory action for an inoperable sampler flow device is to ensure acceptable flow through the particulate and iodine sampler [IL] in use for compliance with RETS. At SONGS, when the permanently installed particulate and iodine sampler becomes inoperable, continuous samples may be taken using temporary auxiliary sampling equipment that includes a calibrated flow gauge.

The Unit 2/3 TS Table 3.3-13 required sample flow estimates at the specified interval whenever the sampler flow device was inoperable, independent of the status of the noble gas monitor or the particulate and iodine sampler. (From February 1982 to January 1985, the specified interval was 4 hours. This interval was changed to 8 hours in January 1985.) However, prior to the transfer of the RETS to the ODCM and contrary to RETS, sample flow estimates were not performed at the specified interval whenever the flow instrumentation was inoperable.

DESCRIPTION OF EVENT

On October 6, 1998, flow verification on the temporary auxiliary sampling equipment installed on the Unit 3 Condenser Air Ejector Wide Range Gas Monitor 3RT-7870 was not performed within the interval required by the ODCM. During the subsequent investigation, SCE identified that it had not implemented, verbatim, compensatory action 36 from February, 1982 to February, 1990 when RETS were part of the TS. Consequently, on

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November 24, 1998, at about 1520 PST (discovery date), SCE concluded that, until the RETS requirement was removed from the TS, SCE was not operating in verbatim compliance with the TS. Therefore, SCE is reporting this event pursuant to 10 CFR 50.73(a)(2)(i)(B).

Also note that RETS were added to the Unit 1 Operating License in August, 1984. In May 1992, the NRC authorized SCE to transfer the Unit 1 RETS to the licensee-controlled Unit 1 ODCM by Operating License Amendment 145. Between 1984 and 1992, flow estimates were not always performed at the specified interval. Although Unit 1 is permanently shutdown and defueled, SCE is including Unit 1 in this report for historical completeness.

CAUSE OF ACTION

The cause of this event is a failure to correctly translate the above described action statement requirements of the RETS into applicable station procedures.

Due to the wording in RETS, station personnel did not understand that the compensatory action for sampler flow estimates applied at all times, independent of the status of the noble gas monitor or the particulate and iodine sampler.

CORRECTIVE ACTIONS

SCE had already implemented requirements to estimate/verify sample flow through the particulate and iodine sampling skid whenever the permanently installed sampler flow instrumentation is declared inoperable.

RETS have been transferred from the TS to the ODCM. SCE will review this issue, determine the appropriate compensatory actions for out-of-service sampling components, and revise the ODCM accordingly.

SAFETY SIGNIFICANCE

The failure to estimate sample flow at the required interval whenever the sampler flow instrumentation was inoperable did not result in any increased releases from the plant or compromise, in any way, the ability to calculate dose to a member of the public. Consequently, there is no safety significance to this event.

ADDITIONAL INFORMATION

Two LERs have been submitted in the last three years regarding the sampling of radioactive effluents:

- LER 2-98-006, Rev. 1, Missed TS Surveillances, and
- LER 2-98-015, Failure to Obtain Representative P&I Samples

Because this occurrence pre-dates these two reported conditions, the corrective actions of these two previous LERs would not have prevented this event from occurring.