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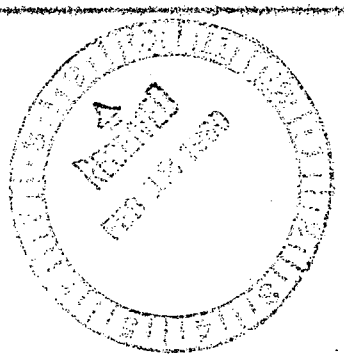
February 7, 1980

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94596

Attention: Mr. R. H. Engelken, Director



Docket No. 50-206
San Onofre Unit 1

Dear Sir:

IE Inspection Report
No. 50-206/79-17

References: 1) NRC (J. L. Crews) letter to SCE (L. T. Papay) dated January 21, 1980, Docket No. 50-206.

2) SCE (H. L. Ottoson) letter to NRC (R. H. Engelken) dated January 11, 1980, Docket No. 50-206.

Reference 1 forwarded IE Inspection Report No. 50-206/79-17 concerning the December 10 - 13, 1979 inspection by members of your staff on activities at our San Onofre Unit 1 facility. Appendix A to Reference 1 contained a Notice of Violation identifying an apparent deficiency in our activities as authorized under NRC License DPR-13. The purpose of this letter is to provide our response to the apparent deficiency as set forth in Item A of the Notice of Violation pursuant to 10 CFR, Part 2, Section 2.201.

Item A. "Technical Specification 6.9.2.b(2) requires that conditions leading to operation in a degraded mode permitted by a limiting condition for operation shall be reported to the NRC within 30 days of occurrence of the event."



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"Contrary to the above requirement, an occurrence involving the failure of the Loop C Tave channel on October 11, 1979, rendering the corresponding variable low pressure safety injection trip channel inoperable had not been reported to the NRC at the time of the inspection. The variable low pressure safety injection trip channels are required to be operable in accordance with the limiting conditions for operation provision in Technical Specifications 3.5.1.B."

Response:

1) Discussion

Regarding the description of the occurrence contained in Item A of the Notice of Violation quoted above, failure of the Loop C Tave sub-channel did occur on October 11, 1979 as reported initially in San Onofre Unit 1 Station Incident Report 79-39 and subsequently to your office in Reference 2. Contrary to Item A, however, Loop Tave inputs to the reactor protection system affect only the pressurizer variable low pressure reactor trip function and are not associated with inputs to the low pressurizer pressure safety injection trip (initiation) function. Additionally, it is noted that the failure in question consisted in loss of the Loop C Tave input to the reactor trip channel No. 3 variable low pressure set point computer. Such a failure results in a reduction of the calculated set point to a value less conservative than required by Technical Specification 2.1. A limiter in the set point computers of each trip channel prevents calculated set points from being reduced to values less than 1835 psig (nominal calculated set point at 100% power is 1860 psig). Consequently, although failure of a Tave subchannel input results in a less conservative calculated set point, such a failure does not render the corresponding variable low pressure reactor trip channel inoperable. Finally, it is noted that Loop C Tave failure could not, by itself, prevent fulfillment of the variable low pressure trip function in a manner consistent with Technical Specification 2.1 since the remaining channels (1 and 2) would be unaffected by the failure.

The potential for failures of the type which occurred in the Loop C Tave sub-channel were considered in the plant design and anticipated by Technical Specification 3.5.1.A. This specification permits continued plant operation at rated power, in the event of a "sub-system instrumentation channel failure", in accordance with the minimum redundancy requirements of Table 3.5.1,

Column II. San Onofre Unit 1 Operating Instruction S-3-2.3 implements this provision by requiring operator action to trip the variable low pressure channel associated with the failed Tave subchannel, thereby establishing minimum channel redundancy for operation of this trip function at the required set point. As stated in Reference 2, prompt operator action was taken to trip the affected variable low pressure channel as required by S-3-2.3 and as provided by Technical Specification 3.5.1.A. Only in the event that the redundancy requirement of Table 3.5.1, Column II, cannot be met promptly and routinely, relying on existing design provisions and procedures, does the limitation on reactor power operation contained in Table 3.5.1, Column III as imposed by Technical Specifications 3.5.1.B become effective. Such a condition did not arise throughout the Loop C Tave failure incident discussed herein.

In consideration of the above, reportability of the Loop C Tave failure is required under Technical Specification 6.9.2.b(1) which addresses the following occurrences:

> "Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems."

Failure to recognize the reportability of this occurrence during the preparation of Station Incident Report 79-39 was due to an oversight.

2) Corrective Steps Taken and Results Achieved

a) Reference 2 constituted a written report to your office, including a completed copy of Licensee Event Report LER 79-025, concerning the Loop C Tave failure.

b) Station Incident Report 79-39, which reported on the occurrence initially and included a finding that the incident was not reportable, has been revised to reflect the reportability of the Loop C Tave occurrence.

3) Corrective Steps Which Will be Taken to Avoid Further Violation

Station Engineering Procedure S-V-2.27, "Preparation of Station Incident Reports Forms", includes procedural actions which must be taken to render a determination of the reportability of

station incidents under Technical Specification 6.9.2. This procedure is being revised to incorporate a check list of reportability criteria such that explicit, written determinations on reportability are made for each criterion. In addition, appropriate station supervisory, operations, and engineering personnel will be required to review this occurrence and the basis for its reportability.

4) Date When Full Compliance Will be Achieved

a) Reporting of this occurrence in accordance with Technical Specification 6.9.2.b was achieved on January 11, 1980.

b) Full compliance with actions described under (2) above will be achieved by April 1, 1980.

Should you have any questions concerning this response, please let me know.

Sincerely,