100 7 Southern California Edison Company SAN ONOFRE NUCLEAR GENERATING STATION P. O. BOX 128 SAN CLEMENTE, CALIFORNIA 92672 H. E. MORGAN TELEPHONE March 26, 1990 STATION MANAGER (714) 368-6241 U. S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555 Subject: Docket No. 50-206 30-Day Report Licensee Event Report No. 90-004 San Onofre Nuclear Generating Station, Unit 1 Pursuant to 10 CFR 50.73(d), this submittal provides the required 30-day written Licensee Event Report (LER) for an occurrence involving the Reactor Coolant System. Neither the health and safety of plant personnel or the public was affected by this occurrence. If you require any additional information, please so advise. Sincerely, Lieger for HE Morgan Enclosure: LER No. 90-004 C. W. Caldwell (USNRC Senior Resident Inspector, Units 1, 2 and 3) J. B. Martin (Regional Administrator, USNRC Region V) Institute of Nuclear Power Operations (INPO) 9004180228 900326 PDR ADOCK 05000206

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On 2/23/90, with Unit 1 in Mode 1 at 91.5% power, during a review of a nonconformance report addressing leakage through letdown orifice isolation valve CV-203 [ISV], it was determined that the potential for a condition prohibited by the basis of Technical Specification (TS) Section 3.1.4 existed. On 3/13/90, during our continuing review of this event, SCE concluded that this also represented a condition not covered by the plant's emergency procedures and subsequently reported it as a non-emergency one-hour report pursuant to 10 CFR 50.72(b)(1)(ii)(C).

San Onofre Unit 1 TS 3.1.4 basis requires that total Reactor Coolant System (RCS) [AB] leakage be limited to 6 gpm for 12 hours during a Station Blackout (SBO). Letdown level control valve LCV-1112 [LCV] is normally considered the RCS leakage boundary for the letdown portion of the Chemical and Volume Control System [CB]. However, during the SBO event postulated by TS 3.1.4 basis, LCV-1112 can not be credited to isolate the letdown system and the containment isolation valves (downstream of LCV-1112) are closed. During this condition, if leakage were to occur through any of the three letdown orifice isolation valves (located between LCV-1112 and the containment isolation valves), relief valve RV-206 might lift (setpoint 485 psig) establishing a leakage path out of the RCS. Were this to occur, it is possible that the TS leakage limit might be exceeded.

The cause of this event was that station procedures, including the Emergency Operating Instruction (EOI), "Loss Of All AC Power," did not adequately consider potential RCS leakage through letdown isolation valves and therefore, did not provide for a positive means (i.e., manual isolation) for meeting the 6 gpm leakage requirement in TS 3.1.4 basis.

As corrective actions, the EOI was revised to require closing a manual isolation valve on the letdown line upstream of the relief valve to ensure positive isolation of letdown. Appropriate training and a drill on the changes to the EOI have been performed.

A revision to this LER will be submitted by 4/17/90, providing a complete discussion of the root cause, corrective actions, and safety significance of this condition.