Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING STATION

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

H. E. MORGAN
STATION MANAGER

TELEPHONE
(714) 368-6241

December 29, 1989

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

Subject: Docket No. 50-206
30-Day Report
Licensee Event Report No. 89-027
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 effluent sampling and analysis. 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,

H E Morgan

Enclosure: LER No. 89-027

cc: 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)

LICENSEE EVENT REPORT (LER)

Facility Name (1)	Docket Number (2)	Page (3)
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1	0 5 0 0 0 2 0 6	1 of 0 4

Title (4)

TECHNICAL SPECIFICATION REQUIRED EFFLUENT SAMPLE LOST DUE TO INADEQUATE ADMINISTRATIVE CONTROLS

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 Names	Docket Number(s)
									NONE	0 5 0 0 0
1 1	3 0	8 9	8 9	0 2 7	0 0	1 2	2 9	8 9		0 5 0 0 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)			
POWER LEVEL (10)	0 9 1	___ 20.402(b)	___ 20.405(c)	___ 50.73(a)(2)(iv)	___ 73.71(b)
		___ 20.405(a)(1)(i)	___ 50.36(c)(1)	___ 50.73(a)(2)(v)	___ 73.71(c)
		___ 20.405(a)(1)(ii)	___ 50.36(c)(2)	___ 50.73(a)(2)(vii)	___ Other (Specify in Abstract below and in text)
		___ 20.405(a)(1)(iii)	X 50.73(a)(2)(i)	___ 50.73(a)(2)(viii)(A)	
		___ 20.405(a)(1)(iv)	___ 50.73(a)(2)(ii)	___ 50.73(a)(2)(viii)(B)	
		___ 20.405(a)(1)(v)	___ 50.73(a)(2)(iii)	___ 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

Name	TELEPHONE NUMBER AREA CODE
H. E. Morgan, Station Manager	7 1 4 3 6 8 - 6 2 4 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)	Expected Submission Date (15)	Month	Day	Year
___ Yes (If yes, complete EXPECTED SUBMISSION DATE) XX NO				

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

Technical Specification (TS) 4.6.1, "Radioactive Gaseous Waste Release Dose Rate", Table 4.6.1.1, requires the Plant Vent Stack (PVS) to be continuously sampled for particulates. TS 4.6.1, Table 4.6.1.1, requires that the particulate samples be analyzed weekly for principal gamma emitters, and a composite analysis be performed for: 1) Gross Alpha isotopes on a monthly basis; and 2) Sr-89 and Sr-90 isotopes on a quarterly basis. On 10/24/89, the weekly (October 17-24) PVS sample was collected and subsequently gamma counted. On 11/21/89, when gathering the weekly PVS samples for the monthly composite analysis, the October 17-24 sample could not be found in its designated storage location. On 11/30/89, after physical and record searches for the sample, it was concluded that the sample had been inadvertently discarded and therefore could not be included with the composite samples for the month of October, contrary to TS 4.6.1. Because the sample contained no unexpected levels of gamma activity, the October 1989 composite sample for the PVS is considered representative and is being used for reporting of radioactive effluents.

The root cause of this event is inadequate administrative controls. While procedures include verification of TS sample analyses, there are no provisions for verifying that gaseous samples to be used later as composite samples have been properly stored. Previous incidents involving the inadvertent discarding of liquid effluent samples were reported in LERs 88-018 (Docket 50-361) and 88-010 (Docket 50-362), and administrative controls had been enhanced for the handling and storage of liquid samples; however, this corrective action was not applied to particulate samples.

This incident has been reviewed with the Chemistry Technician involved with the handling of the missing sample and will be reviewed with appropriate Chemistry personnel. Administrative controls will be revised to include a sign-off verification for the storage of particulate samples.

Plant: San Onofre Nuclear Generating Station
Unit: One
Reactor Vendor: Westinghouse
Event Date: 11-30-89

A. CONDITIONS AT TIME OF THE EVENT:

Mode: 1, Power Operation

B. BACKGROUND INFORMATION:

Technical Specification (TS) 4.6.1, "Radioactive Gaseous Waste Release Dose Rate", Table 4.6.1.1, requires the Plant Vent Stack (PVS) to be continuously sampled for particulates. TS 4.6.1, Table 4.6.1.1, requires that the particulate samples be analyzed weekly for principal gamma emitters, and composite analysis be performed for: 1) Gross Alpha isotopes on a monthly basis; and 2) Sr-89 and Sr-90 isotopes on a quarterly basis. The PVS particulate sample filter is collected and analyzed weekly at the site for gamma emitters, and placed in storage to make up the monthly and quarterly composite samples, which are representative of the particulates released from the PVS. The composite samples are sent to an off-site laboratory once per month to perform the TS required analyses for Gross Alpha, Sr-89 and Sr-90. The composite samples are used for determining that the radioactive materials released in gaseous effluents from the site do not exceed the TS annual dose rate limits.

C. DESCRIPTION OF THE EVENT:

1. Event:

On October 24, 1989, with Unit 1 at 91% power, the weekly (October 17-24) PVS sample was collected and subsequently gamma counted, as required by TS 4.6.1. On November 21, 1989, when gathering the weekly PVS filters from storage for shipment to the offsite laboratory for the monthly composite analysis, the October 17-24 sample could not be found in its designated storage location. On November 30, 1989, after physical and record searches for the filter sample, it was concluded that the sample had been inadvertently discarded and therefore could not be included with the composite samples for the month of October, contrary to TS 4.6.1, Table 4.6.1.1.

2. Inoperable Structures, Systems or Components that Contributed to the Event:

Not applicable.

3. Sequence of Events:

Not applicable.

4. Method of Discovery:

The PVS sample was discovered missing from storage by Chemistry personnel while preparing monthly composites for shipment on 11/21/89. On 11/30/89, it was concluded that the sample had been inadvertently discarded and searches in an attempt to locate the sample were stopped.

5. Personnel Actions and Analysis of Actions:

Not applicable.

6. Safety System Responses:

Not applicable.

D. CAUSE OF THE EVENT:

1. Immediate Cause:

The Unit 1 PVS sample collected on October 24, 1989, was gamma counted, however, apparently it was subsequently discarded due to a cognitive error by a Chemistry Technician (utility, non-licensed). All Chemistry Technicians authorized to perform gamma analyses had been trained to transfer such samples to storage upon completion of gamma analyses. The technician who performed the gamma analysis of the missing sample does not recall whether he had properly stored the sample.

2. Root Cause:

The root cause of this event is inadequate administrative controls over the handling and storage of gaseous effluent samples. While chemistry procedures include verification of TS sample analyses, there are no provisions for verifying that gaseous samples to be used later as composite samples have been properly stored. Previous incidents involving the inadvertent discarding of liquid effluent samples required for composite analysis were reported in Licensee Event Report Nos. 88-018 (Docket 50-361) and 88-010 (Docket 50-362). As a result of these incidents, administrative controls had been enhanced by including a sign-off step for their proper storage, however, this corrective action was not applied to particulate samples.

E. CORRECTIVE ACTIONS:

1. Corrective Actions Taken:

This incident was reviewed with the Chemistry Technician involved with the handling of the missing sample.

2. Planned Corrective Actions:

a. This event will be reviewed with all Units 1, 2 and 3 Chemistry Technicians and Foremen, emphasizing the importance of proper handling and storage of chemistry samples.

b. Administrative controls will be revised to include a sign-off verification for the storage of particulate samples.

c. Administrative controls for the handling of other types of TS required chemistry samples which are required to be retained will be reviewed to ensure similar deficiencies do not exist.

F. SAFETY SIGNIFICANCE OF THE EVENT:

Because the sample contained no unexpected levels of gamma activity, the October 1989 composite sample for the PVS is considered representative and is being used for reporting of radioactive effluents. The radioactive materials released in gaseous effluents from the site have been significantly less than TS limits. Therefore, there is no significance to the sample loss.

G. ADDITIONAL INFORMATION:

1. Component Failure Information:

Not applicable.

2. Previous LERs for Similar Events:

Previous incidents involving the inadvertent discarding of liquid effluent samples required for composite analysis were reported in Licensee Event Report Nos. 88-018 (Docket 50-361) and 88-010 (Docket 50-362). As a result of these incidents, administrative controls had been enhanced by including a sign-off step for their proper storage, however, this corrective action was not applied to gaseous effluent samples.

3. Results of NPRDS Search:

Not applicable.

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1. Corrective Actions Taken:

This incident was reviewed with the Chemistry Technician involved with the handling of the missing sample.

2. Planned Corrective Actions:

a. This event will be reviewed with all Units 1, 2 and 3 Chemistry Technicians and Foremen, emphasizing the importance of proper handling and storage of chemistry samples.

b. Administrative controls will be revised to include a sign-off verification for the storage of particulate samples.

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Because the sample contained no unexpected levels of gamma activity, the October 1989 composite sample for the PVS is considered representative and is being used for reporting of radioactive effluents. The radioactive materials released in gaseous effluents from the site have been significantly less than TS limits. Therefore, there is no significance to the sample loss.

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Not applicable.