

*Southern California Edison Company*

SAN ONOFRE NUCLEAR GENERATING STATION  
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H. B. RAY  
STATION MANAGER

August 20, 1982

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596-5368

Attention: Mr. R. H. Engelken, Regional Administrator

Dear Sir:

Subject: Docket No. 50-206  
30-day Written Report  
Licensee Event Report No. 82-020  
San Onofre Nuclear Generating Station, Unit 1

This report is submitted in accordance with Section 6.9.2.b(3) of the San Onofre Nuclear Generating Station Provisional Operating License No. DPR-13, Appendix A, Technical Specifications (T.S.). The report describes three occurrences where the 8-hour limitation for periodic testing of diesel generator sets had been exceeded.

During a QA Audit of Technical Specifications compliance conducted earlier this year, a question was identified regarding our interpretation of Action Statement 3.7.2.B in that, on three occasions with one diesel inoperable, the remaining diesel was not tested "at least once per eight (8) hours" but with an interval between tests exceeding eight hours. In a conversation with NRC (Mr. Paulson) on July 29, 1982, we determined that we had misapplied the 25% interval extension discussed in note (1) to Table 1.1 of the Technical Specifications. This 25% extension cannot be applied to time intervals specified in Action Statements. The three occasions are as follows:

1. While the plant was in Mode 1 on June 30, 1981, Diesel Generator Set No. 2 of Unit 1 was declared inoperable for maintenance. According to the action requirement of Technical Specification Section 3.7.2.B, the operability of the remaining diesel generator had to be verified by testing at least every eight hours. On July 2, 1981, 9 hours and 27 minutes elapsed before Diesel Generator Set No. 1 was tested.

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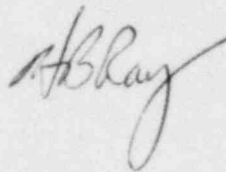
2. On July 16, 1981, Diesel Generator Set No. 1 was out of service while the plant was in Mode 1. The required 8-hour test period was exceeded by 38 minutes on that date for Diesel Generator No. 2
3. On February 9, 1982, the 8-hour limit for testing the redundant diesel generator was again exceeded. In this case, Diesel Generator Set No. 1 was out of service for maintenance while the plant was in Mode 1. Set No. 2 was not tested for 8 hours and 21 minutes.

The cause of these occurrences was the erroneous application of a 25% tolerance to the time period between testing of diesel generators defined by the Technical Specifications. As corrective action, the responsible personnel have been instructed that no tolerance applies to the time period defined in Technical Specification Action Requirements and that, therefore, the 8-hour limit for diesel generator testing cannot be exceeded under any circumstances.

This information has been incorporated into our operator retraining program. Retraining of operators will be completed by September 30, 1982. In addition, Surveillance Instruction S01-12.9-1, "Diesel Generator Operability Testing", will be changed by September 15, 1982 to state clearly that the 8-hour limit for testing of diesel generators cannot be extended.

If you have any questions or need additional information, please let me know.

Sincerely,



Enclosure: LER 82-020

cc: L. F. Miller (USNRC Resident Inspector, San Onofre Unit 1)

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement

U. S. Nuclear Regulatory Commission  
Office of Management Information and Program Control

Institute of Nuclear Power Operations