Southern California Edison Company

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March 14, 1994

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

Subject:

Docket Nos: 50-361 and 50-362

Voluntary Report

Licensee Event Report No. 94-001

San Onofre Nuclear Generating Station, Units 2 and 3

This submittal provides a voluntary Licensee Event Report (LER) for an occurrence involving manual actuation of Train A of the Toxic Gas Isolation System in accordance with Technical Specification 3.3.2 Action B. Since this occurrence involves a shared system between Units 2 and 3, a single report for Unit 2 is being submitted in accordance with NUREG-1022. Neither the health nor the safety of plant personnel or the public was affected by this occurrence.

Edison believes that this event is not reportable because the actuation: (1) was a preplanned requirement of the Technical Specifications, and (2) the system was not responding to a valid signal; rather, it was a precautionary action due to the inoperability of a fire damper. However, the reporting requirements for this occurrence are unclear. Edison is pursuing clarification of the reporting requirements through the current review and comment process for the proposed Revision 1 to NUREG-1022, "Licensee Event Report System".

If you require any additional information, please so advise.

Sincerely,

Enclosure: LER No. 94-001

cc: K. E. Perkins, Jr., Acting Regional Administrator, USNRC Region V

J. Sloan, USNRC Senior Resident Inspector, Units 2 and 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 & 3
Institute of Nuclear Power Operations (INPO)

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