Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING ST& TION P.O. BOX 128 SAN CLEMENTE, CALIFORNIA 92672

H. B. RAY STATION MANAGER TELEPHONE (714) 492 7700

> TE-29 82-303

August 27, 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. 50-361 30-Day Reports Licensee Event Reports Nos. 82-074, 82-079, 82-082, and 82-083 San Onofre Nuclear Generating Station, Unit 2
- Reference: Letter, H.B. Ray (SCE) to R.H. Engelken (NRC), dated August 13, 1982 (Re: LER's 82-044, 82-049, 82-050. 82-051, 82-053, 82-057, 82-068 and 82-071)

The referenced letter transmitted 30-day written reports and Licensee Event Reports (LER's) for eight occurrences involving the Condensate Storage Tank T-121 low water level. As noted in that letter, violations of Technical Specification 3.7.1.3 continue to occur. A Technical Specifiction change has been submitted to NRC to alleviate this problem.

Pursuant to Section 6.9.1.13b of Appendix A, Technical Specifications to Operating License NPF-10, for San Onofre Unit 2, this submittal, therefore, provides the required 30-day written reports and copies of LER's for four similar occurrences.

Limiting Condition for Operation (LCO) 3.7.1.3 requires that while in Modes 1 - 3, the Condensate Storage Tank T-121 must be operable with a contained volume of at least 144,000 gallons. The associated Action Statement requires that with the tank declared inoperable, it must be returned to operable status within four hours or be in at least hot standby (Mode 3) within the next six hours and in hot shutdown (Mode 4) within the following six hours. The Surveillance Requirement 4.7.1.3 requires verification of the contained water volume at least once each 12 hours.

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On July 29, 1982, with the plant in Mode 2, while feeding the steam generators using the Auxiliary Feedwater Pumps, the water level in Tank T-121 fell below the allowable limit. This tank receives its makeup water from tank T-120. However, tank T-121 has its overflow set about 5,000 gallons above the Technical Specification limit of 144,000 gallons. Thus, prompt operator action is required to prevent entering the LCO Action Statement.

The cause and corrective action of these events were identified in the referenced letter and remain unchanged. It should be noted that modifications have been made to the level indications available to the operators to facilitate precise control.

This situation has no safety significance because the operating history at this point in plant startup precludes any significant decay heat.

The violations of Technical Specification 3.7.1.3 occurred numerous times and may continue to occur until the proposed Technical Specification change is approved. notwithstanding the very best efforts of the operators to maintain tank level within the 5,000 gallons deadband. LER 82-074 addresses the occurrence on July 29, 1982. LER 82-079, 82-082 and 82-083 address the same type of occurrences on July 30, August 2 and 7, 1982. respectively.

If there are any questions, please contact me.

Sincerely,

aftskay

Enclosures: LER's 82-074, 82-079, 82-082 and 82-083

cc: 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

A. E. Chaffee (USNRC Resident Inspector, San Onofre Unit 2)