

Southern California Edison Company

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92674-0128

R. W. KRIEGER
VICE PRESIDENT
NUCLEAR GENERATION

March 28, 1994

TELEPHONE
714-366-6255

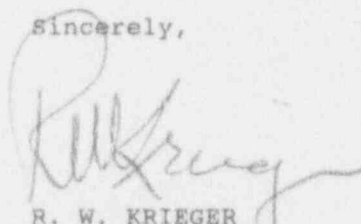
U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Docket Nos. 50-361 and 50-362
30-Day Report
Licensee Event Report No. 94-002
San Onofre Nuclear Generating Station, Units 2 and 3

Pursuant to 10 CFR 50.73(d), this submittal provides the required 30-day written Licensee Event Report (LER) for an occurrence involving a missed fire protection surveillance in Units 2 and 3. Since this occurrence involves similar systems, cause, and corrective actions applicable to 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.

If you require any additional information, please so advise.

Sincerely,



R. W. KRIEGER
VICE PRESIDENT
NUCLEAR GENERATION

MARobinson
Enclosure: LER No. 94-002

cc: K. E. Perkins, Jr., Acting Regional Administrator, USNRC Region V
J. A. Sloan, Senior Resident Inspector, San Onofre Units 1, 2 and 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 & 3
Institute of Nuclear Power Operations (INPO)

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Units 2 and 3
San Onofre Nuclear Generating Station

LER No. 2-94-002

bcc:

| | |
|--|--------------------------------------|
| Harold B. Ray, Senior Vice President, 102-A, IOC | J. M. Curran, N-41, SONGS |
| R. M. Rosenblum, Vice President, 109-B, IOC | R. L. Erickson, (SDG&E), L-50, SONGS |
| R. W. Krieger, Vice President, D-14, SONGS | G. T. Gibson, N-45, SONGS |
| E. K. Aghjayan (City of Anaheim), Public Utilities Dept. P. O. Box 3222, Anaheim, CA 92803 | B. Katz, D-4-E, SONGS |
| D. P. Breig, D-16, SONGS | W. C. Marsh, IOC-A |
| B. D. Carnahan (City of Riverside), Public Utilities Dept. 3900 Main St., Riverside, CA 92522 | T. E. Oubre, Rm. 337 GO1 |
| L. O. Cash, D-18, SONGS | J. L. Rainsberry, A-242, IOC-A |
| C. Chiu, D-4-E, SONGS | J. L. Reeder, E-50, SONGS |
| J. R. Clark, D-12, SONGS | J. Reilly, X-480, IOC |
| | R. Waldo, D-15, SONGS |
| | J. J. Wambold, 104, IOCA |
| | M. A. Wharton, 135-J, IOC |
| | C. E. Williams, N-45, SONGS |
| | ONL File, N-45, SONGS |
| | CDM File |
| | NLFS Files, X-222, IOC-A |
| | NSG, N-46, SONGS |
| | NTD Resource Center, E-50B |
| | RCTS File, N-45, SONGS |

REVIEWERS: * H. B. Ray
R. W. Krieger
* R. M. Rosenblum
* W. C. Marsh
* W. G. Zintl
* W. W. Strom
* C. A. Couser
** G. T. Gibson
** C. E. Williams

* Concurrence received via E-Mail
** Concurrence indicated on supplemental bcc

LICENSEE EVENT REPORT (LER)

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

Title (4) MISSED FIRE PROTECTION SURVEILLANCE

| 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) |
| 0 3 | 1 6 | 9 4 | 9 4 | --- | --- | 0 3 | 2 8 | 9 4 | UNIT 3 | 0 5 0 0 0 3 6 2 |
| OPERATING MODE (9) 1 | | | | | | | | | | |

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)

| | | | |
|--|--|---|--|
| <input type="checkbox"/> 20.402(b) | <input type="checkbox"/> 20.405(c) | <input type="checkbox"/> 50.73(a)(2)(iv) | <input type="checkbox"/> 73.71(b) |
| <input type="checkbox"/> 20.405(a)(1)(i) | <input type="checkbox"/> 50.36(c)(1) | <input type="checkbox"/> 50.73(a)(2)(v) | <input type="checkbox"/> 73.71(c) |
| <input type="checkbox"/> 20.405(a)(1)(ii) | <input type="checkbox"/> 50.36(c)(2) | <input type="checkbox"/> 50.73(a)(2)(vii) | <input type="checkbox"/> Other (Specify in |
| <input type="checkbox"/> 20.405(a)(1)(iii) | <input checked="" type="checkbox"/> 50.73(a)(2)(i) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) | Abstract below and |
| <input type="checkbox"/> 20.405(a)(1)(iv) | <input type="checkbox"/> 50.73(a)(2)(ii) | <input type="checkbox"/> 50.73(a)(2)(viii)(B) | in text) |
| <input type="checkbox"/> 20.405(a)(1)(v) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(x) | |

LICENSEE CONTACT FOR THIS LER (12)

Name R. W. Krieger, Vice President, Nuclear Generation TELEPHONE NUMBER AREA CODE 7 | 1 | 4 3 | 6 | 8 | - | 6 | 2 | 5 | 5

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) NO

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

On February 25, 1994, during a review of fire protection [KP] surveillances, Edison noted that an 18 month Technical Specification (TS) visual inspection of fire water spray nozzles for Train B Control Room Emergency Air Cleanup System (CREACUS) [VI] charcoal filters may not have been performed in August 1992 as required.

On March 16, 1994, Edison's search for the missing surveillance record concluded that the visual surveillance for the CREACUS Train B units' spray nozzles required by TS 4.7.8.2, "Spray and/or Sprinkler Systems," had not been performed when required in August 1992. Therefore, Edison is reporting this event in accordance with 10CFR50.73(a)(2)(i).

This surveillance was missed due to an incomplete review and inattention to detail during the revision of a fire protection surveillance procedure.

On March 17, 1994, Edison completed the TS required visual surveillance of the CREACUS Train B units' spray nozzles.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

| SAN ONOFRE NUCLEAR GENERATION STATION | DOCKET NUMBER | LER NUMBER | PAGE |
|---------------------------------------|---------------|------------|--------|
| UNIT 2 | 05000361 | 94-002-00 | 2 of 3 |

DESCRIPTION OF THE EVENT:

Plant: San Onofre Nuclear Generating Station, Units 2 and 3
 Reactor Vendor: Combustion Engineering
 Event Date: March 16, 1994
 Mode: Unit 2, Mode 1, 98% reactor power
 Unit 3, Mode 1, 97% reactor power

On February 25, 1994, during a review of fire protection [KP] surveillances, Edison noted that an 18 month Technical Specification (TS) visual inspection of fire water spray nozzles for Train B Control Room Emergency Air Cleanup System (CREACUS) [VI] Ventilation Supply Unit (A206) and Air Conditioning Unit (E419) charcoal filters might not have been performed in August 1992 as required. In response, Edison conservatively declared the fire water spray systems for these units inoperable on February 25, 1994 and posted a fire watch in accordance with TS 3.7.8.2.

On March 16, 1994, Edison's search for the missing surveillance record concluded that the visual surveillance for the CREACUS Train B units' spray nozzles required by TS 4.7.8.2, "Spray and/or Sprinkler Systems," had not been performed when required in August 1992. Therefore, Edison is reporting this event in accordance with 10CFR50.73(a)(2)(i).

CAUSE OF THE EVENT:

This surveillance was missed due to an incomplete review and inattention to detail during the revision of a fire protection surveillance procedure. This appears to have been an isolated instance. Specifically, in January 1992, the fire protection procedure was revised to move the CREACUS Train A and Train B components from Attachment 13 to Attachments 16 and 17. However, the repetitive maintenance order (RMO) that implemented the surveillance procedure was not updated to reflect this change. The CREACUS Train A components had previously been assigned to a separate RMO to avoid a scheduling conflict with Train B components. Consequently, when the surveillance was performed in August 1992, the RMOs referenced Attachments 13 and 16, but not Attachment 17. Therefore, the Train B units' spray nozzles were not inspected.

CORRECTIVE ACTIONS:

On March 17, 1994, Edison completed the TS required visual surveillance of the CREACUS Train B units' spray nozzles. Additionally, Edison revised the RMO to correctly reflect the surveillance procedure. Emergency Preparedness (EP) group will reemphasize the need to follow guidelines with the appropriate EP personnel who are responsible for procedure revisions and reviews. A complete review of the affected RMOs and the attachments of this fire protection surveillance will be performed to ensure no other such mismatches between required surveillances and their respective repetitive maintenance orders exist.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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SAFETY SIGNIFICANCE:

Upon completion of the surveillance on March 17, 1994, it was determined that the bottom two of three spray nozzles in A206 failed the visual inspection. The bottom nozzle was corroded and clogged with corrosion products from the fire water piping and probably would not have passed water. The middle nozzle had some clogging from corrosion products and would have passed water, but probably not in the required spray pattern. The top nozzle was clear, and would have functioned as designed. It is not possible to determine when the two nozzles' material condition deteriorated.

Based on engineering judgement, because the charcoal filters are enclosed and no combustible materials are stored in the vicinity of A206, the partial spray capacity would have been sufficient to control a fire in the charcoal filter until the fire department arrived and extinguished the fire. Thus, the affected spray system would have performed its design function.

During the interval since the missed surveillance, CREACUS Train A has been taken out of service, occasionally for up to five days, several times a year for inspection and maintenance. Accordingly, during those limited periods CREACUS Train B was the relied upon Train although it's spray nozzles were not fully effective.

ADDITIONAL INFORMATION:

A review of previous LERs did not reveal any previous similar events.