

Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING STATION
P.O. BOX 128
SAN CLEMENTE, CALIFORNIA 92672

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H. B. RAY
STATION MANAGER

TELEPHONE
(714) 492-7700

September 24, 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. 82-095, 82-097, 82-102,
82-104, 82-106, 82-108, 82-109, 82-110, and 82-111
San Onofre Nuclear Generating Station, Unit 2

Reference: Letters, 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),
and H.B. Ray (SCE) to R.H. Engelken (NRC), dated August
27, 1982 (Re: LER's 82-074, 82-079, 82-082, and 82-083)

The referenced letters transmitted 30-day written reports and Licensee Event Reports (LER's) for occurrences involving the Condensate Storage Tank T-121 low water level. As noted in those letters, violations of Technical Specification 3.7.1.3 continue to occur. A Technical Specification 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 nine 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

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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.

On August 25, 1982, with the plant in Mode 3, while feeding the steam generators using the Auxiliary Feedwater Pumps, the water level in Tank T-121 fell below the allowable limit. This tank 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 letters 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 82-095 addresses the occurrence on August 25, 1982. LER's 82-097, 82-102, 82-104, 82-106, 82-108, 82-109, 82-110, and 82-111 address the same type of occurrences.

If there are any questions, please contact me.

Sincerely,

HB Eng

Enclosures: LER's No: 82-095, -097, -102, -104, -106, -108, -109, -110, and -111

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

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Office of Management Information and Program Control

Institute of Nuclear Power Operations