

Southern California Edison Company

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April 20, 1994

R. W. KRIEGER
VICE PRESIDENT
NUCLEAR GENERATION

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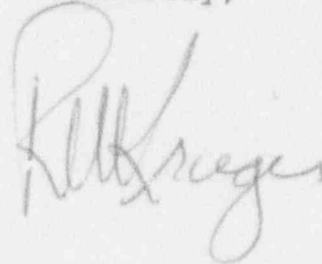
U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Docket Nos. 50-361 and 50-362
30-Day Report
Licensee Event Report No. 94-002, Revision 1
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 missed fire protection surveillances 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,



Enclosure: LER No. 94-002, Revision 1

cc: L. J. Callan, Regional Administrator, USNRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office,
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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LICENSEE EVENT REPORT (LER)

Facility Name (1) **SAV ONOFRE NUCLEAR GENERATING STATION, UNIT 2** Docket Number (2) **0 | 5 | 0 | 0 | 0 | 3 | 6 | 1** Page (3) **1** of **0 | 4**

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 | 2 8 | 9 4 | 9 4 | 0 0 2 | 0 1 | 0 4 | 1 9 | 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 Abstract below and in text) |
| <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) | |
| <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) | |
| <input type="checkbox"/> 20.405(a)(1)(v) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(ix) | |

LICENSEE CONTACT FOR THIS LER (12)

Name **R. W. Krieger, Vice President, Nuclear Generation** TELEPHONE NUMBER **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) YES (If yes, complete EXPECTED SUBMISSION DATE) NO

Expected Submission Date (15) Month Day Year

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. During a review of past surveillances, Edison concluded, on March 28, 1994, that the previous two 18 month TS visual inspections of the fire water spray nozzles for the Hydrogen Purge Exhaust [BB] units 2A082 and 3A082 for Units 2 and 3, respectively, had not been performed in early 1991, and late 1992 as required. Edison is reporting this event in accordance with 10CFR50.73(a)(2)(i).

These surveillances were missed due to inattention to detail during revisions of the fire protection surveillance procedure.

On March 17, 1994, Edison completed the TS required visual surveillance of the CREACUS Train B units spray nozzles. On April 8, 1994, Edison completed the TS required visual surveillance of the Hydrogen Purge Exhaust units spray nozzles.

Edison will reemphasize the need to follow guidelines for procedure revisions.

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DESCRIPTION OF THE EVENT:

Plant: San Onofre Nuclear Generating Station, Units 2 and 3
 Reactor Vendor: Combustion Engineering
 Event Date: March 28, 1994
 Mode: Unit 2, Mode 1, 98% reactor power
 Unit 3, Mode 1, 98% 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.

During the review of past surveillances discussed in the corrective action below, Edison concluded, on March 28, 1994, that the previous two 18 month TS visual inspections of the fire water spray nozzles for the Hydrogen Purge Exhaust [BB] units 2A082 and 3A082 for Units 2 and 3, respectively, had not been performed in early 1991, and late 1992 as required. On March 28, 1994, Edison declared the fire water spray systems for 2A082 and 3A082 inoperable and posted a fire watch in accordance with TS 3.7.8.2.

Edison is reporting this event in accordance with 10CFR50.73(a)(2)(i).

CAUSE OF THE EVENT:

These surveillances were missed due to inattention to detail during revisions of the fire protection surveillance procedure.

Specifically, in January 1992, the fire protection procedure was revised to move the inspection of the fire water spray nozzles for the CREACUS Train A and Train B components from Attachment 13 to Attachments 16 and 17, respectively. However, the repetitive maintenance order (RMO) that implemented the surveillance procedure was not updated to reflect this change. 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.

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Similarly, during a December 1988 revision of the same fire protection surveillance procedure, the inspection of the fire water spray nozzles for 2A082 and 3A082 were moved from attachments 10 and 11 to attachments 20 and 21. However, the RMOs that implemented the fire protection surveillances for 2A082 and 3A082 were not updated to reflect this change. Consequently, when these components were surveilled in early 1991 and late 1992, the RMOs referenced Attachments 10 and 11, but not Attachments 20 and 21. Therefore, the Hydrogen Purge Exhaust 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.

On April 8, 1994, Edison completed the TS required visual surveillance of the Hydrogen Purge Exhaust units spray nozzles.

Edison revised the RMOs to correctly reference the appropriate attachments of surveillance procedure.

The Site Emergency Preparedness Division will reemphasize the need to follow guidelines with the appropriate Site Emergency Preparedness personnel who are responsible for procedure revisions and reviews by May 13, 1994.

On March 28, 1994, Edison completed a review of the fire protection surveillance procedure, procedure attachments, and all associated RMOs with no other discrepancies noted.

SAFETY SIGNIFICANCE:

CREACUS

Upon completion of the surveillance on March 17, 1994, it was determined that the bottom two of the 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 judgment, 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 its spray nozzles were not fully effective.

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| HYDROGEN PURGE EXHAUST

| The spray nozzles were inspected and satisfactorily passed the visual surveillance on
| April 8, 1994. Therefore, there was no safety significance to the missed surveillances
| of the Hydrogen Purge Exhaust units spray nozzles.

ADDITIONAL INFORMATION:

| No other previous events have been reported pursuant to 10CFR50.73 where a surveillance
| has been missed due to inattention to detail during revisions of procedures in the last
| three years.