



Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING STATION

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92074-0128

R. W. KRIEGER
STATION MANAGER

TELEPHONE
(714) 968-6255

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

Subject: Docket No. 50-361
30-Day Report
Licensee Event Report No. 90-013
San Onofre Nuclear Generating Station, Unit 2

Pursuant to 10 CFR 50.73(d), this submittal provides the required 30-day written Licensee Event Report (LER) for an occurrence involving a delinquent waste g. decay tank Technical Specification surveillance. 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. 90-013

cc: C. W. Caldwell (USNRC Senior Resident Inspector, Units 1, 2 and 3)

J. B. Martin (Regional Administrator, USNRC Region V)

Institute of Nuclear Power Operations (INPO)

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LICENSEE EVENT REPORT (LER)

Facility Name (1) SAN ONOPRE NUCLEAR GENERATING STATION, UNIT 2	Docket Number (2) 0 5 0 0 0 3 6 1	Page (3) 3 of 5
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Delinquent Waste Gas Decay Tank 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 Name	Docket Number(s)						
1	1	0	7	9	0	9	0	0	1	2	0	7	9	0	NCNE	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)	
POWER LEVEL (10) 1 0 0	<input type="checkbox"/> 20.402(b) <input type="checkbox"/> 20.405(a)(1)(i) <input type="checkbox"/> 20.405(a)(1)(ii) <input type="checkbox"/> 20.405(a)(1)(iii) <input checked="" type="checkbox"/> X <input type="checkbox"/> 20.405(a)(1)(iv) <input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 20.405(c) <input type="checkbox"/> 50.36(c)(1) <input type="checkbox"/> 50.56(c)(2) <input type="checkbox"/> 50.73(a)(2)(i) <input type="checkbox"/> 50.73(a)(2)(ii) <input type="checkbox"/> 50.73(a)(2)(iii)
	<input type="checkbox"/> 50.73(a)(2)(iv) <input type="checkbox"/> 50.73(a)(2)(v) <input type="checkbox"/> 50.73(a)(2)(vi) <input type="checkbox"/> 50.73(a)(2)(vii) <input type="checkbox"/> 50.73(a)(2)(viii)(A) <input type="checkbox"/> 50.73(a)(2)(viii)(B) <input type="checkbox"/> 50.73(a)(2)(ix)	<input type="checkbox"/> 73.71(b) <input type="checkbox"/> 73.71(c) <input type="checkbox"/> Other (Specify in Abstract below and in text)

LICENSEE CONTACT FOR THIS LER (12)

Name R. W. Krieger, Station Manager	TELEPHONE NUMBER AREA CODE 7 3 4	3 6 8 - 6 2 5 5
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS
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SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> Yes (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	Expected Submission Date (15)	Month	Day	Year
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On 11/07/90, with Units 2 and 3 at 100% power, an evaluation of a Quality Assurance (QA) audit of Technical Specification (TS) required radioactive effluent surveillances concluded that on two occasions the Waste Gas Decay (WGD) tank surveillance interval, including the 25% extension permitted by TS 4.0.2, had been exceeded. TS surveillance 4.11.2.6 requires that the quantity of radioactive material contained in a decay tank be determined to be less than 134,000 curies once every 24-hours when material is being added to the tank. On 8/05/89 and 7/18/90, the WGD tank surveillance was performed 5 minutes and 45 minutes late, respectively.

The Chemistry surveillance program is based upon performance of the once per 24-hour surveillance each day during the same 8-hour shift. Performing the surveillance at approximately the same time each day, as intended by the program, will result in meeting the 24-hour requirement (the TS's permit a 25% extension, thus allowing a maximum of 30 hours between each surveillance). The implementing administrative controls did not ensure that this assumption was sufficiently defined and fully understood by all Chemistry Technicians. Consequently, although the required analysis was performed on consecutive days, they were performed on different shifts and at intervals greater than the maximum permitted (30-hours).

As corrective action, the surveillance program administrative controls have been revised to clearly define applicable TS surveillance intervals. A review of all Chemistry and Effluent TS's was performed to identify any similar specifications where inadequate administrative controls may have existed and results of TS 3/4.11.2.6 surveillances have been reviewed for the past 18 months to ensure no additional violations had occurred. This event has been reviewed with appropriate Chemistry personnel.

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Plant: San Onofre Nuclear Generating Station
Unit: Two
Reactor Vendor: Combustion Engineering
Event Date: 11-07-90

A. CONDITIONS AT TIME OF THE EVENT:

Mode: 1, Power Operations
RCS Temperature: 553 F

B. BACKGROUND INFORMATION:

1. System Description:

The Gaseous Radwaste System (GRS) [wE], which is common to Units 2 and 3, collects, compresses, stores and monitors potentially radioactive gases that are generated within the plants (e.g., discharges from the gas strippers, volume control tank [TK], reactor coolant drain tank [TK], etc.). The gases initially collect in the low pressure waste gas surge tank (WGST) [TK] and are compressed by the waste gas compressors [CMP] and stored in one of six high pressure Waste Gas Decay (WGD) Tanks [TK]. Only one WGD tank is aligned to receive waste gas at any time to minimize the amount of radioactive gas that can be released if a decay tank or connected piping ruptures.

2. Technical Specification Requirements

Technical Specification (TS) 3/4.11.2.6, "Radioactive Effluent - Gas Storage Tanks," requires that the quantity of radioactive material contained in a waste gas decay tank be determined to be less than or equal to 134,000 curies noble gas (considered as Xe-133) at least once per 24 hours when radioactive materials are being added to that tank.

3. Administrative Controls

The Chemistry Organization utilizes a 'Chemistry Shift Requirements Computer Program' which generates a printout at the beginning of every 8-hour shift. This computer printout is used by the Chemistry Technicians to determine the sampling and analysis requirements that must be performed on that shift. The program assumes that the work activities are performed at approximately the same time each shift, thus ensuring TS compliance without there being specific attention given to the time each surveillance is performed. As such, the printout does not address the time of day beyond which the surveillance interval will have been exceeded. The surveillance results are recorded on a data sheet which includes the sampling time, decay tank activity and other pertinent information.

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C. DESCRIPTION OF THE EVENT:

1. Event:

On 11/07/90, with Units 2 and 3 at 100% power, an evaluation of a Quality Assurance (QA) audit of TS surveillances concluded that on two occasions, the WGD tank surveillance interval (24-hours), including the 25% extension permitted by TS 4.0.2, had been exceeded. Specifically, on 8/05/89 and 7/18/90, the WGD tank surveillance was performed 5 minutes and 45 minutes late, respectively.

2. Inoperable Structures, Systems or Components that Contributed to the Event:

Not applicable.

3. Sequence of Events:

<u>DATE</u>	<u>TIME</u>	<u>ACTION</u>
08/04/89	1250	TS surveillance performed.
08/05/89	1850	TS surveillance interval expires.
08/05/89	1855	TS surveillance performed.
07/17/90	1355	TS surveillance performed.
07/18/90	1955	TS surveillance interval expires.
07/18/90	2040	TS surveillance performed.

4. Method of Discovery:

The 08/05/89 violation was identified during a QA audit of TS required effluent surveillances. The 07/18/90 violation was identified by a Chemistry Foreman (utility, non-licensed) during his review to confirm the QA findings.

5. Personnel Actions and Analysis of Actions:

Not applicable.

6. Safety System Responses:

Not applicable.

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D. CAUSE OF THE EVENT:

1. Immediate Cause:

This surveillance activity is normally performed on the same shift at approximately the same time each day. In these cases, however, although the required analyses were performed on consecutive days, the technicians deviated from the normal practice and performed the surveillance on different shifts.

2. Root Cause:

The surveillance program implementing administrative controls were inadequate in that the requirement that the surveillance be performed at approximately the same time each day was not sufficiently defined and was not fully understood by all Chemistry Technicians. Neither the computer printout specifying the shiftly TS requirement nor the data sheet used for recording the results emphasized the required interval.

E. CORRECTIVE ACTIONS:

1. Corrective Actions Taken:

- a. All Chemistry and Effluent TSs were reviewed to identify any similar deficiencies. None were identified.
- b. TS 3/4.11.2.6 surveillances have been reviewed for the past 18 months to ensure no additional violations had occurred. None were identified.
- c. The 'Chemistry Shift Requirements Computer Program' has been revised to include the specific time requirements on applicable TS surveillances.
- d. The decay tank analysis data sheet acceptance criteria has been revised to require that the surveillance be performed within a specific time interval.
- e. This event has been reviewed with appropriate Chemistry personnel.

F. SAFETY SIGNIFICANCE OF THE EVENT:

Restricting the quantity of radioactivity contained in the WGD tanks provides assurance that in the event of an uncontrolled release of the tank's content, the resulting total body exposure to an individual at the nearest exclusion boundary will not exceed 0.5 rem. In the past, the maximum allowable activity in the WGD tanks has never been exceeded. For the two cases, the TS surveillance intervals were exceeded by only 5 and 45 minutes and the activity of the tank's contents was found to be well below TS limits. It is therefore concluded that there was no safety significance associated with this event.

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G. ADDITIONAL INFORMATION:

1. Component Failure Information:

Not applicable.

2. Previous LERs for Similar Events:

LER 89-009 (Docket No. 50-206) identified several Effluent Quality Reports which had exceeded the 31-day surveillance interval, including the 25% extension permitted by TS 4.0.2. A review of procedural controls was performed at that time, however the need to include a specific time interval on the computer program or data sheet for the WGD tank surveillance was not identified.