Southern California Edison Company 1887 NOV 15 PM 12: 49

SAN CLEMENTE, CALIFORNIA 92672

H R RAY STATION MANAGER

TELEPHONE (7)4) 492-7700

November 10, 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. 50-206

Final Report

Licensee Event Report 82-025

San Onofre Nuclear Generating Station, Unit 1

Reference:

- 1) Letter, H. B. Ray (SCE) to R. H. Engelken (NRC), 24-Hour Confirmation Letter, LER 82-025, dated October 14, 1982
- Letter, H. B. Ray (SCE) to R. H. Engelken (NRC). 14-Day Follow-Up Report, LER 82-025, dated October 27, 1982

Reference 1 furnished written confirmation of a 24-hour report made in accurdance with Section 6.9.2.a(2) of Appendix A, Provisional Operating License DPR-13 concerning the discovery, on two occasions, of failure to provide required fire watch coverage. Reference 2 represents an interim 14-Day follow-up report for Reference 1 and reported a third occurrence and indicated that a final report would be submitted by November 10, 1982. This letter provides that final report and provides a revised LER 82-025 which describes all three occurrences.

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On October 12, 1982, the fire watch posted at the Turbine Lubrication Oil Reservoir Area was determined not to have been at his post for a period of time prior to 3:45 a.m. Although this determination was reported as a violation of the Technical Specifications, subsequent evaluation has determined that the fire watch was not required by the Technical Specifications in that the inoperable Foam Suppression System which caused the Station to post a fire watch at this location was not a Technical Specification-required fire suppression system as established in Technical Specification 3.14. Although this occurrence does not represent a Technical Specification violation, it does represent unacceptable fire protection practice which warrants corrective action.

The second lapse in fire watch coverage occurred at 4:00 a.m. on October 13, 1982, when as a result of radiography being performed in the 4160-Volt Switchgear Room and the Turbine Lubrication Oil Reservoir Area, fire watches previously posted in these areas were secured in order to prevent unnecessary radiation exposure. Fire watches for these areas were not resumed until 5:30 a.m. Although fire watches were not required in the Turbine Lubrication Oil Reservoir Area by the Technical Specifications, as discussed above, fire watches were required in the 4160-Volt Switchgear Room due to the inoperability of Technical Specification-required fire detectors in that area. The 1 1/2 hour period without fire watches in this area exceeds the one-hour interval required by Technical Specification 3.14.8(4)a.

The final lapse occurred on October 20, 1982, when the fire watch posted within the containment as a result of the inoperability of the spray/sprinkler system required by Technical Specification 3.14.A(2)a, was not present for about 15 minutes between 6:00 a.m. and 8:00 a.m. This 15-minute interruption of the continuous fire watch was repeated four times (once every 2 hours) between 8:00 a.m. and 4:00 p.m. and once between 4:00 p.m. and 5:00 p.m. The continuous fire watch was interrupted in this manner at the direction of the fire watch's supervisor in order to check other areas adjacent to the containment sphere and the power block building as a roving fire patrol.

Corrective actions for the October 12 occurrence included termination of the employee who had left his fire watch post. On October 13, 1982, a memorandum was issued to all fire watches to address their responsibilities in light of the problems encountered on both October 12 and October 13, 1982. Fire watch personnel were required to sign an acknowledgment that they had read and understood this memorandum. As additional corrective action after the third failure to provide fire protection, two fire watch supervisory positions were added to the fire watch program. Further, a memorandum was issued on October 26 that clarified the authority for the release of a fire watch and stressed the strict adherence to the requirements of a continuous fire watch. This was discussed with the Fire Watch Supervision and again, signed acknowledgments were obtained.

- 3 -Mr. R. H. Engelken November 10, 1982 The plant was in Mode 5 during the period of time when these occurrences took place. There was no adverse effect on the health and safety of the public. Sincerely, HBRy /Winny Enclosure: LER 82-025 cc: L. Miller (USNRC Resident Inspector, San Onofre Unit 1) 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