

Southern California Edison Company

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VICE PRESIDENT
NUCLEAR GENERATION

May 20, 1994

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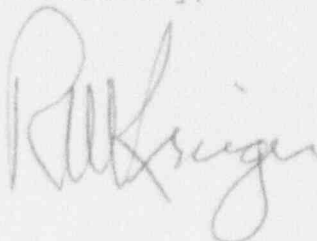
U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Docket Nos. 50-361 and 50-362
30-Day Report
Licensee Event Report No. 94-003
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 at 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. 94-003

cc: L. J. Callan, Regional Administrator, USNRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office,
USNRC Region IV
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) SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2
 Docket Number (2) 0 | 5 | 0 | 0 | 0 | 3 | 6 | 1
 Page (3) 1 of 0 3
 Title (4)

Missed Fire Protection Surveillances

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	4	2	9	4	0	0	3	0	5	2	0	94	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)
 POWER LEVEL (10) 0 | 9 | 8
 20.402(b) _____ 20.405(c) _____ 50.73(a)(2)(iv) _____ 73.71(b) _____
 20.405(a)(1)(i) _____ 50.36(c)(1) _____ 50.73(a)(2)(v) _____ 73.71(c) _____
 20.405(a)(1)(ii) _____ 50.36(c)(2) _____ 50.73(a)(2)(vii) _____ Other (Specify in Abstract below and in text)
 20.405(a)(1)(iii) x 50.73(a)(2)(i) _____ 50.73(a)(2)(viii)(A) _____
 20.405(a)(1)(iv) _____ 50.73(a)(2)(ii) _____ 50.73(a)(2)(viii)(B) _____
 20.405(a)(1)(v) _____ 50.73(a)(2)(iii) _____ 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 0 | 7 | Day 2 | Year 9 | 4

XX Yes (If yes, complete EXPECTED SUBMISSION DATE) NO

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

On April 22, 1994, during a reliability centered maintenance review of the Fire Protection system [KP], Edison noted that a three year Technical Specification (TS) air flow test for six manual deluge open head spray/sprinkler systems had not been performed for the following components:

- Unit 2 Charcoal Filter for Containment Hydrogen Purge Exhaust (2A-082)
- Unit 3 Charcoal Filter for Containment Hydrogen Purge Exhaust (3A-082)
- Two Common Charcoal Filters for Control Room Emergency Ventilation (A-206 & 207)
- Two Common Charcoal Filters for Control Room Emergency AC (E-418 & 419)

Additionally, on May 9, 1994, Edison discovered that a TS surveillance for a Unit 2 containment recirculation unit filter [BK] (CRUF) deluge valve was not being performed. Edison is reporting these occurrences in accordance with 10CFR50.73(a)(2)(i).

Edison has not yet been able to determine the specific cause(s) of the missed surveillances. Edison is completing a Division Investigation Report (DIR) to determine the cause(s) of the missed surveillances.

On May 13, 1994, Edison completed the required air flow surveillance tests for the six manual deluge open head spray/sprinkler systems and confirmed the systems were operable. Based on a review of Unit 2 Cycle 7 refueling outage documentation, Edison has confirmed that the CRUF deluge system valve is in its correct (locked open) position. Edison has reviewed all Fire Protection Equipment listed in TS Table 3.7-5 and confirmed that all other required testing is being accomplished.

Edison will develop, by July 1, 1994, the necessary administrative controls for the required surveillances.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

SAN ONOFRE NUCLEAR GENERATION STATION	DOCKET NUMBER	LER NUMBER	PAGE
UNIT 2	05000361	94-003-00	2 of 3

DESCRIPTION OF THE EVENT:

Plant: San Onofre Nuclear Generating Station, Units 2 and 3
Reactor Vendor: Combustion Engineering
Event Date: April 22, 1994
Mode: Unit 2, Mode 1, 98% reactor power
Unit 3, Mode 1, 97% reactor power

On April 22, 1994, during a reliability centered maintenance review of the Fire Protection System [KP], Edison noted that a three year Technical Specification (TS) air flow test for six manual deluge open head spray/sprinkler systems had not been performed as required. Specifically, the TS surveillances were not performed on the manual deluge open head spray/sprinkler systems for the following components:

- Unit 2 Charcoal Filter for Containment Hydrogen Purge Exhaust (2A-082)
- Unit 3 Charcoal Filter for Containment Hydrogen Purge Exhaust (3A-082)
- Two Common Charcoal Filters for Control Room Emergency Ventilation (A-206 & 207)
- Two Common Charcoal Filter for Control Room Emergency AC (E-418 & 419)

Edison declared the fire water spray systems inoperable on April 22, 1994, and posted a fire watch for the affected areas in accordance with TS 3.7.8.2.

Following a complete review of the maintenance records, Edison was unable to find documentation for any previous surveillances for these six components. Edison concluded that the TS 4.7.8.2.e surveillance was not being performed as required.

During the review discussed in the corrective actions below, on May 9, 1994, Edison discovered that a Unit 2 containment recirculation unit filter [BK] (CRUF) deluge system valve surveillance was not being performed (Edison has been correctly surveilling the corresponding Unit 3 valve). TS 4.7.8.2.b requires Edison to verify that each deluge system inside containment is operable every 31 days during cold shutdown, by verifying that each valve in the flow path inside containment is in its correct position. While Edison had been verifying the correct position of the inside containment deluge valves for other systems, one valve (SA2301MU229) for the CRUF deluge system was omitted from the applicable procedure. Therefore, Edison had not been surveilling this Unit 2 valve as required.

Edison is reporting these occurrences in accordance with 10CFR50.73(a)(2)(i).

CAUSE OF THE EVENT:

Due to the amount of research necessary to understand the sequence of development of the administrative controls involved, Edison has not yet been able to determine the specific cause(s) of the missed surveillances. Edison is completing a Division Investigation Report (DIR) to determine the cause(s) of the missed surveillances. Edison plans to complete the DIR and revise this LER by July 29, 1994.

CORRECTIVE ACTIONS:

On May 13, 1994, Edison completed the required air flow surveillance tests for the six manual deluge open head spray/sprinkler systems and confirmed the systems were operable. Edison added the Unit 2 CRUF deluge system valve to the appropriate surveillance procedure. Based on a review of Unit 2 Cycle 7 refueling outage documentation, Edison has confirmed that the CRUF deluge system valve is in its correct (locked open) position. Additionally, Edison has reviewed all Fire Protection Equipment listed in TS Table 3.7-5 and confirmed that all other required testing is being accomplished.

Edison will develop, by July 1, 1994, the necessary administrative controls for the required surveillances of the six manual deluge open head spray/sprinkler systems.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

SAN ONOFRE NUCLEAR GENERATION STATION UNIT 2	DOCKET NUMBER 05000361	LER NUMBER 94-003-00	PAGE 3 of 3
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Because the CRUF is in a location that is not normally accessible during power operation, the valve will be surveilled during the next Unit 2 outage.

As stated above, Edison is completing a DIR to determine if additional corrective actions are required.

SAFETY SIGNIFICANCE OF THE EVENT:

Control Room and Hydrogen Purge Filters:

The affected systems are manually actuated at the isolation valves. The fire areas protected by these systems have fire detectors that alarm in the control room and the San Onofre Fire Department. In the event a fire had occurred, the control room would dispatch an operator to open the manual deluge/isolation valves. The San Onofre Fire Department would concurrently respond and would be available to suppress the fire in the event the deluge system did not suppress the fire. In addition, when surveilled, all six systems were confirmed to be operable. Therefore, there was minimal safety significance for this occurrence.

Containment Recirculation Unit Filter

The containment recirculation unit filter is designed to reduce concentrations of airborne particulates and gaseous activity inside containment during plant operation. The CRUF is not a safety-related component and is not required to operate during any design basis accident. Therefore, there was minimal safety significance for this occurrence.

ADDITIONAL INFORMATION:

LER 2-94-002, and 2-94-002.001 also reported missed fire protection surveillances. In those instances, the surveillances were missed because a surveillance procedure was revised without similarly revising the associated implementing Repetitive Maintenance Orders.