

Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING STATION

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H. B. RAY
STATION MANAGER

December 15, 1982

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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. 82-145 and 82-156
San Onofre Nuclear Generating Station, Unit 2

This submittal is in accordance with the reporting requirements of Section 6.9.1.13c of Appendix A to Facility Operating License NPF-10. It describes two (2) reportable occurrences involving Technical Specification Sections 4.0.2 and 4.0.4 in regard to Surveillance Requirement 4.4.5.2.1c associated with Limiting Condition for Operation (LCO) 3.4.5.2. Completed copies of LER 82-145 and 82-156 are enclosed.

On November 15, 1982, at 1900 with the plant in Mode 1, a review of operational surveillance records revealed that the Reactor Coolant System (RCS) water inventory balance in accordance with Surveillance Requirement 4.4.5.2.1c had not been performed since 0600 on November 9, 1982. The 157 hours between the last surveillance and the time of discovery violated the 90 hour (72 hours + 25% allowance) requirement of Section 4.0.2. Additionally, during this period two plant startups from Mode 3 to 1 (five entries into a higher operational mode) were made in violation of Section 4.0.4. Immediately after discovery of the missed surveillance, plant conditions were stabilized and an inventory balance in accordance with S023-3-3.37 was performed and completed at 2210 on November 15, 1982. The total leakage determined from this inventory was .4 gpm. LER 82-145 addresses this event.

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On November 30, 1982, at 0900 with the plant in Mode 1, a review of operational surveillance records revealed that the RCS water inventory balance due on November 28, 1982 by 1700 had been missed. The inventory balance was immediately taken and indicated a total RCS leakage of .57 gpm. The time lapse from the last RCS water inventory balance on November 24, 1982 at 2200 violated Section 4.0.2. Additionally, 4.0.4 was violated since one plant startup from Mode 3 to 1 (two entries into a higher operational mode) was made. LER 82-156 addresses this event.

Subsequent investigation revealed that in both cases the RCS water inventory was properly scheduled by the Operations Surveillance Group. However, the surveillances could not be performed on the days scheduled because plant conditions were not sufficiently stable. The surveillances were not rescheduled and the allowable times were exceeded.

As corrective action to prevent recurrence, shift supervisors have reviewed the circumstances of these events and have been directed to integrate the RCS water inventory surveillance into plant operations by controlling plant conditions to allow a stable period for performance of the surveillance. Additionally, a shift sign-off system for scheduled surveillances has been established. Using this system, the shift supervisor is made aware of all surveillances due on his shift including those that have been rescheduled by previous shifts. Since these events, all RCS water inventory surveillances have been completed on schedule.

There was no impact on plant operation or the health and safety of plant personnel or the public since the total leakages determined from the water inventory balances performed during this time were .57 gpm or less, there was no indication of leakage greater than this, and all other RCS leakage surveillances were performed during this period.

If there are any questions regarding the above, please contact me.

Sincerely,

HB Roy / N. M. M. M.

Enclosures: LER 82-145 and LER 82-156

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

U. S. Nuclear Regulatory Commission
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