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

Gentlemen:

Subject: Docket No. 50-361
Special Report
San Onofre Nuclear Generating Station, Unit 2

Reference: Technical Specification 3.3.3.1

Technical Specification 3.3.3.1 requires Edison to maintain one plant vent stack (PVS) monitor (2RT-7865 or 3RT-7865) operable when either Unit 2 or 3 is in Mode 1, 2, or 3. Due to non-uniform mixing in the common PVS plenum, Edison conservatively requires both PVS monitors to be operable when either Unit is in Mode 1, 2, or 3. When either monitor is inoperable for a period of greater than 72 hours, Edison conservatively implements the preplanned alternate method of monitoring the PVS (in accordance with TS 3.3.3.1, Action 19) for both monitors and submits a special report to the NRC. This report is provided because less than two monitors were available for about 89 hours between September 13 and 17, 1995.

Between September 13 and 17, 1995, when Unit 2 was in Mode 1 and Unit 3 was in Modes 4 and 5; the Unit 2 PVS monitor (2RT-7865) was removed from service for about 60 hours to perform a routine surveillance and the alternate monitoring method was implemented for both 2RT-7865 and 3RT-7865. Due to an administrative change discussed below, 3RT-7865 was not returned to service when 2RT-7865 was returned to service. When reviewing the Unit 3 records on September 17, it was noted that the monitor(s) had been out of service for longer than allowed.

The reason the monitors were inoperable for this period was an inappropriate change to the equipment control administrative tracking process. This process uses three separate log books, one each for Units 2 and 3 (unit-specific books), and one for common equipment (both-unit impact book). Operators annotate the log books each time equipment operability status changes. When

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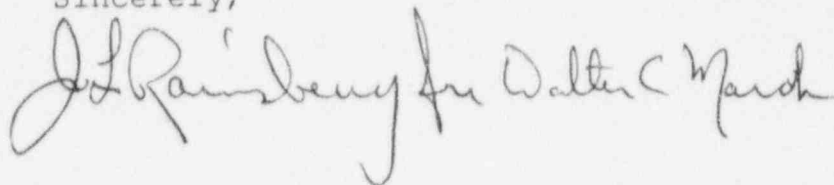
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revising this process during the summer of 1995, Edison inappropriately moved the common PVS monitors from the "both unit impact" log book to the unit-specific books (the monitor numbers are Unit specific, "2RT" and "3RT," but Edison's requirement to have them both operable was overlooked).

Edison has returned PVS monitor tracking to the "both unit impact" book. Because the preplanned alternate method of monitoring was in effect, there was no safety significance to this event.

This report was delayed in order to provide a complete response. If you have any questions, please contact me.

Sincerely,



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