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KENNETH P. BASKIN
VICE PRESIDENT

TELEPHONE
REGION VISE 213-572-1401

June 25, 1984

U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. J. B. Martin, Regional Administrator

Dear Sir:

Subject: Docket Nos. 50-361 and 50-362
IE Inspection Reports 50-361/84-14 and 50-362/84-14
Response to Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

Mr. R. A. Scarano's letter of May 25, 1984, issued IE Inspection Reports 50-361/84-14 and 50-362/84-14 and forwarded a Notice of Violation resulting from the May 6 and 7, 1984, special inspection conducted by Mr. G. P. Yuhas. The enclosure to this letter provides our response to the Notice of Violation contained in Appendix A to Mr. Scarano's letter of May 25, 1984. In response to the request that we identify what we believe is the root cause of the violation, we have included an additional section entitled "Reasons for the Violation." Our response has been expanded to address what measures we have taken and additional measures we plan to take to address this cause.

If you require additional information, please so advise.

Sincerely,

Kenneth P. Baskin

Enclosure

cc: A. E. Chaffee (USNRC Resident Inspector, Units 1, 2 and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)

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ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. R. A. Scarano's letter of May 25, 1984.

Appendix A to Mr. Scarano's letter states:

"Technical Specification 6.8, 'Procedures and Programs' states in part that: Written Procedures shall be established, implemented, and maintained covering Emergency Plan implementation. Emergency Plan Implementing Procedure EPIP S023-VIII-1, 'Recognition and Classification of Emergencies, Revision 1,' established pursuant to this specification, requires the Shift Supervisor/Emergency Coordinator to classify and declare an Unusual Event within 15 minutes when the Plant Vent Stack Airborne Monitor (2/3RE-7808C) indicates greater than 4.2 E3 counts per minute (cpm) with two exhaust fans operating and the release path is not isolated within 15 minutes.

"Contrary to the above requirement, at 1527 PDT on May 5, 1984, the Plant Vent Stack Airborne Monitor alarmed and indicated 7.3 E3 cpm with two exhaust fans operating, the release path was not isolated within 15 minutes and the Shift Supervisor/Emergency Coordinator did not declare an Unusual Event within 15 minutes. The Shift Supervisor declared the Unusual Event at 1840 PDT. The release path was isolated shortly thereafter and the Unusual Event was terminated at 1845 PDT. About 420 curies of noble gas were released during the period of 1530 to 1845 PDT.

"This is a Severity Level IV, Supplement VIII."

RESPONSE

REASONS FOR THE VIOLATION:

The violation was caused by an isolated deficiency in the procedure which describes actions to be taken to determine whether Radiation Monitor 2/3RE-7808 alarms require declaration of an Unusual Event. At the time of the alarm of Radiation Monitor 2/3RE-7808C, it was believed by the operator to be potentially invalid, based on the fact that Radiation Monitor 2RE-7865 was not in alarm. In accordance with the alarm response procedure, the Shift Superintendent first took action to determine whether the alarm represented a condition requiring an immediate report to the NRC pursuant to 10 CFR 50.72 by requesting Chemistry to resolve the ambiguity between Radiation Monitors 2/3RE-7808C and 2RE-7865 readings, and to quantify the release. At the time of the Radiation Monitor 2/3RE-7808C alarm, the other Unit 3 Plant Vent Stack Monitors were inoperable (and Limiting Conditions for Operation Action Statement requirements satisfied) and therefore other, normally available indications that Unusual Event declaration should be considered, were not available.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED :

The alarm response procedure, Procedure S023-5-2.24, "Miscellaneous Utilities 61-A" has been revised to refer the operator to the Emergency Plan Implementing Procedure (EPIP) S023-VIII-1, "Recognition and Classification of Emergencies," which defines the conditions under which prompt declaration of an Unusual Event is required.

Although not a cause of this violation, action is being taken to provide an increased awareness of radiation monitors alarm status on the part of the operators and Control Room Supervisors. Shift briefings were held with each operating crew to stress the importance of cognizance of any radiation monitors in alarm. Operators have been instructed to document which radiation monitors are in alarm on shift turnover sheets, and significant background radiation level changes will be noted on the common log, turnover sheet, and brought to the Control Room Supervisor's attention. In addition, to reduce the number of alarms, radiation monitor alarm setpoints were revised based on updates to the Offsite Dose Calculation Manual. The setpoints now correspond to requirements of Technical Specification Limiting Condition for Operation 3.11.2.1, and such setpoints have been incorporated into the appropriate EPIP which defines emergency action level declaration requirements.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE :

To ensure other radiation monitor alarm response procedures similarly refer to the appropriate EPIP, a review of the radiation monitor alarm response procedures will be performed by July 31, 1984.

The 1984-1985 Licensed Operator Requalification Program will include additional training concerning appropriate response to radiation monitor alarms, setpoints, and their relation to emergency action levels or Technical Specification actions.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED :

Full compliance was reached at 1840 PDT on May 5, 1984, when the Shift Supervisor declared the Unusual Event.