

LICENSEE EVENT REPORT (LER)

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| 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 2 |
|---|---|-----------------------------|

TITLE (4)
ADMINISTRATIVE ERROR IN TECHNICAL SPECIFICATION TABLE ON SNUBBERS

| EVENT DATE (5) | | | LER NUMBER (6) | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| MONTH | DAY | YEAR | YEAR | SEQ. NUMBER | REV. NUMBER | MONTH | DAY | YEAR | FACILITY NAMES | | DOCKET NUMBER(S) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 01 | 23 | 85 | 85 | 0115 | 010 | 02 | 22 | 85 | UNIT 3 | | 0 5 0 0 0 3 6 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">OPERATING MODE (9) 6</td> <td colspan="11">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)</td> </tr> <tr> <td rowspan="6">POWER LEVEL (10) 01010</td> <td><input type="checkbox"/> 20.402(b)</td> <td><input type="checkbox"/> 20.405(c)</td> <td><input type="checkbox"/> 50.73(a)(2)(iv)</td> <td><input type="checkbox"/> 73.71(b)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(i)</td> <td><input type="checkbox"/> 50.36(c)(1)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)</td> <td><input type="checkbox"/> 73.71(c)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(ii)</td> <td><input type="checkbox"/> 50.36(c)(2)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)</td> <td rowspan="4">OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iii)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(i)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)(A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iv)</td> <td><input type="checkbox"/> 50.73(a)(2)(ii)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)(B)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(v)</td> <td><input type="checkbox"/> 50.73(a)(2)(iii)</td> <td><input type="checkbox"/> 50.73(a)(2)(x)</td> </tr> </table> | | | | | | | | | | | | OPERATING MODE (9) 6 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11) | | | | | | | | | | | POWER LEVEL (10) 01010 | <input type="checkbox"/> 20.402(b) | <input type="checkbox"/> 20.405(c) | <input type="checkbox"/> 50.73(a)(2)(iv) | <input type="checkbox"/> 73.71(b) | <input type="checkbox"/> 20.405(a)(1)(i) | <input type="checkbox"/> 50.36(c)(1) | <input type="checkbox"/> 50.73(a)(2)(v) | <input type="checkbox"/> 73.71(c) | <input type="checkbox"/> 20.405(a)(1)(ii) | <input type="checkbox"/> 50.36(c)(2) | <input type="checkbox"/> 50.73(a)(2)(vii) | OTHER (Specify in Abstract below and in Text, NRC Form 366A) | <input type="checkbox"/> 20.405(a)(1)(iii) | <input checked="" type="checkbox"/> 50.73(a)(2)(i) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) | <input type="checkbox"/> 20.405(a)(1)(iv) | <input type="checkbox"/> 50.73(a)(2)(ii) | <input type="checkbox"/> 50.73(a)(2)(viii)(B) | <input type="checkbox"/> 20.405(a)(1)(v) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(x) |
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LICENSEE CONTACT FOR THIS LER (12)

| NAME | TELEPHONE NUMBER |
|--------------------------------------|-------------------------|
| J. G. HAYNES, STATION MANAGER | 7114 4921-717010 |

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPDOS | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPDOS |
|-------|--------|-----------|--------------|---------------------|-------|--------|-----------|--------------|---------------------|
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SUPPLEMENTAL REPORT EXPECTED (14)

| | | | | | |
|--|--|-------------------------------|-------|-----|------|
| <input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) | <input checked="" type="checkbox"/> NO | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
| | | | | | |

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

On January 21, 1985, with Unit 2 in Mode 6 and Unit 3 in Mode 1, an evaluation was completed which concluded that Technical Specification, Table 3.7-4b, which lists the number of snubbers which are required to be operable on each of the respective plant systems did not reflect the actual number and size of snubbers installed for some of the respective plant systems.

The Table inaccuracies were caused by design changes which resulted in changes in the number of snubbers not being reflected in the Technical Specification Table. As corrective action, a Technical Specification Amendment has been submitted to the NRC, in accordance with Generic Letter 84-13, deleting the Snubber Table. In addition, Southern California Edison has conducted a review of appropriate Technical Specification Tables to ensure that similar changes have been promptly submitted to the NRC. Also, all personnel involved in the processing of design changes have been reinstructed in the evaluation of design changes for their impact on Technical Specification information.

There are no reasonable or credible circumstances under which this condition would have been more severe.

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

| | | | | | | |
|---|--|----------------|---------------|-------------|----------|----------|
| FACILITY NAME (1) SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2 | DOCKET NUMBER (2) 0 5 0 0 0 3 6 1 | LER NUMBER (6) | | | PAGE (3) | |
| | | YEAR | SEQ. NUMBER | REV. NUMBER | | |
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

On January 21, 1985, with Unit 2 in Mode 6 and Unit 3 in Mode 1, an evaluation was completed which concluded that Technical Specification, Table 3.7-4b, which lists the number of snubbers (EIIS Component Code SNB) which are required to be operable on each of the respective plant systems did not reflect the actual number and size of snubbers installed for some of the respective plant systems.

During the preparation of the Technical Specification Table prior to issuance of the Units 2 and 3 licenses, data were included indicating the number of snubbers on each of the associated systems for incorporation into Table 3.7-4b. However, during the period prior to the actual issuing of the Operating Licenses, design changes were implemented, which revised the actual number of snubbers installed, but were not recognized to require a revision to the Technical Specification Table. Prior to the implementation of these design changes, an engineering analysis was completed demonstrating that the affected systems would perform all required safety functions and would fully meet appropriate design criteria.

During the initial visual surveillances in December 1983, these inconsistencies were identified and in order to compile an accurate list, the design documents, on which this Table is based, were revised and updated. It was incorrectly assumed that since the NRC was issuing a generic letter which would allow the deletion of this Table, that revisions to the Table were not required and, therefore, as a result of this assumption, the Table was not revised.

During the current Refueling Outage for Unit 2, additional design changes were implemented, which again revised the actual number of installed snubbers. These changes were again implemented without the required Technical Specification Table changes. This oversight was again due to the erroneous assumption made earlier about the impending NRC generic letter and a failure during the review and acceptance of the design changes to recognize the changes as requiring a revision to the Tables.

Notwithstanding that the snubbers were not required to meet design criteria and that all systems have been, and still remain, operable and capable of performing their intended safety function under all design basis events, additional snubbers have been added to comply with the current Table values.

As corrective action, Technical Specification Amendment Number NPF-10/15-139 has been submitted to the NRC in accordance with Generic Letter 84-13, deleting the Snubber Table and a controlled listing of the actual number of installed snubbers per system is being maintained at the Station. In addition, Southern California Edison has conducted a review of appropriate Technical Specification Tables to ensure that similar administrative changes have been promptly submitted to the NRC. Also, all personnel involved in the processing of design changes have been reinstructed in the evaluation of design changes for their impact on Technical Specification information.

There are no reasonable or credible circumstances under which this condition would have been more severe.

Southern California Edison Company



SAN ONOFRE NUCLEAR GENERATING STATION
P.O. BOX 128
SAN CLEMENTE, CALIFORNIA 92672

J. G. HAYNES
STATION MANAGER

February 22, 1985

TELEPHONE
(714) 492-7700

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

Subject: Docket No. 50-361
Licensee Event Report No. 85-015
San Onofre Nuclear Generating Station, Units 2 and 3

Pursuant to 10 CFR 50.73(a)(2)(i)(B), this submittal provides the required 30-day written Licensee Event Report (LER) for an occurrence involving an administrative error in the Technical Specification Table on snubbers. Since this occurrence involved similar components on Units 2 and 3, a single LER for Unit 2 is enclosed per NUREG-1022. Neither the health and safety of plant personnel nor the public were affected by this event.

If you require any additional information, please so advise.

Sincerely,

Enclosure: LER No. 85-015

cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)

J. B. Martin (Regional Administrator, NRC Region V)

Institute of Nuclear Power Operations (INPO)

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11