



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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JUN 2 1983

MEMORANDUM FOR: Richard C. Lewis, Director  
Division of Project and Resident Programs  
Region II

FROM: Karl V. Seyfrit, Chief  
Reactor Operations Analysis Branch  
Office for Analysis and Evaluation  
of Operational Data

SUBJECT: PERFORMANCE EVALUATION FOR SYSTEMATIC ASSESSMENT  
OF LICENSEE PERFORMANCE (SALP DUKE POWER COMPANY)

In support of the ongoing Duke Power Company SALP review, AEOD has reviewed Duke Power Company's LER submittals for the Oconee Plant. AEOD's review focused on the accuracy and completeness of the licensee's reporting. The review included LERs for Oconee 1, 2, and 3 which were written between June 1, 1982 and March 31, 1983. In general, the submittals were very good. The LERs usually contain excellent descriptions of the events and in many cases the licensee has provided comprehensive updates of the LERs.

The licensee should be commended for its handling of the Dresser Valve ring setting problem (LER 269/82-018). The LER describes a systematic approach that the licensee took in order to investigate a valve operability problem, and determine its safety significance. The licensee took prudent action when he became aware of the problem which surfaced as a result of EPRI's valve testing program.

LER 269/82-015 (original issue December 23, 1982 and update December 30, 1982) is indicative of the licensee's satisfactory reporting of operating events, including analyses of the event and a comprehensive listing of the followup corrective actions that were taken.

If you have any questions regarding this matter, please contact either myself or Harold Ornstein.

Karl V. Seyfrit, Chief  
Reactor Operations Analysis Branch  
Office for Analysis and Evaluation  
of Operational Data

cc: J. Suerma in, NRR

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JUN 10 1983

MEMORANDUM FOR: Daniel Sternberg, Chief  
Reactor Operations Project Branch  
Division of Resident, Reactor Projects and  
Engineering Inspection, Region V

FROM: Karl V. Seyfrit, Chief  
Reactor Operations Analysis Branch  
Office for Analysis and Evaluation  
of Operational Data

SUBJECT: EVALUATION OF LERs FOR SAN ONOFRE-3 FOR  
THE PERIOD FROM JULY 1, 1982 TO MAY 30, 1983 -  
AEOD INPUT TO THE SALP REVIEW.

In support of the ongoing SALP review, AEOD has reviewed the LERs for San Onofre Unit 3. This review has focused on the usefulness of the submittals to AEOD, and on the accuracy and completeness of the licensee's reporting. Our observations for Unit 3 were exactly the same as stated in the letter for the SALP review of Unit 2. However, because substantially less LERs were submitted for Unit 3 (because required LER reporting started later in the assessment period) our comments are noted in a one-by-one LER breakdown in the enclosure. While the review of Unit 2 was more generalized, the enclosure for Unit 2 is also applicable to Unit 3.

If you have any questions regarding this report, please contact myself or Ted Cintula of my staff.

*Karl V. Seyfrit*  
Karl V. Seyfrit, Chief  
Reactor Operations Analysis Branch  
Office for Analysis and Evaluation  
of Operational Data

Enclosure:  
As stated

cc w/enclosure:  
A. Chaffee, Region V  
H. Poole, NRR

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we thought the component and component manufactures code were not being used optimally. The following is our specific review of the LER Form for Unit 3:

LER No.	COMPONENT USED	CODE MORE CORRECT	COMPONENT USED	MANUFACTURER MORE CORRECT
82-001	ZZZZZ	INSTRU	Z999	*
82-003**				
82-004	XXXXXX	FILTER	Z999	*
82-005**				
82-007	ZZZZZ	VESSEL	Z999	C490?
82-009	XXXXXX	HTEXCH	Z999	C490?
83-005			Z999	*
83-007	ZZZZZ		Z999	*
83-019**				
83-020	PIPEXX	PIPEXX	Z999	*
83-021	ZZZZZ	XXXXXX	Z999	*
83-022	VALVEX	VALVEX	Z999	*
83-023**				
83-024**				
83-028***				
83-029***				
83-031**				

Our review of the other coded blocks on the LER Form showed that the licensee used the correct code in these spaces. The form was clearly typed, the codes were centered in the boxes, and there were very few typo's. In contrast to the above table, we noted that there were very few noninformation codes (the ZZzs) used in other coded blocks. When they were used, they were used correctly.

\* Component is not specified so licensee is not obliged to designate a component manufacturer. However, if licensee had used the correct component code then he would have had to identify the component manufacturer. The component manufacturer was not identified elsewhere in these reports.

\*\* Excessive narrative in EVENT DESCRIPTION AND PROBABLE CONSEQUENCES and/or CAUSE DESCRIPTION AND CORRECTIVE ACTIONS

\*\*\* Supplementary information mandatory on type "T" reports, but not provided by licensee.

Finally, we noted improvement in useage of the proper code for the COMPONENT CODE and COMPONENT MANUFACTURER in the LER form. This observation can be confirmed by reviewing the table which show decreasing comments on code selection with higher LER numbers.



SALP REVIEW FOR SAN ONOFRE-3

The licensee submitted over 40 LERs for this unit from November 19, 1982 to May 30, 1983 (the unit was licensed for fuel loading and low power testing on November 15, 1982). It is typical for units in the initial phases of startup testing to submit a large number of LERs, and San Onofre-3 was not an exception.

Our review included the following LER numbers:

82-001 through 82-011

83-001 through 83-032

Our observations for Unit 3 would be the same as stated in the SALP review for Unit 2 - without exception. This should be expected because the units are substantially identical and the LERs were prepared by the same person. We noted that the licensee's transmittal letter was shortened in content (and was substantially less informative) with the start of the 1983 LERs. As mentioned in the SALP review for Unit 2, we thought the earlier transmittal letters to be exceptionally informative, while the subsequent cover letters were routine and mechanical. In the 1983 LERs, the licensee generally attached supplemental information as required (ten-day LERs) but the supplemental information did not provide the quantity of information observed in the earlier LER transmittal letters. The shorter supplemental letter led to overrunning of the narrative portions of the LER form as the licensee tried to convey the required information.

Our review of Unit 2 tended to be generalized because of the large number of LERs in the assessment period. With the lesser quantities of LERs available for review at Unit 3, we are able to provide specific comments on the completion of the LER Form (NRC Form 366). In the review of Unit 2,



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MEMORANDUM FOR: Daniel Sternberg, Chief ✓  
Reactor Operations Project Branch  
Division of Resident, Reactor Projects and  
Engineering Inspection, Region V

FROM: Karl V. Seyfrit, Chief  
Reactor Operations Analysis Branch  
Office for Analysis and Evaluation  
of Operational Data

SUBJECT: EVALUATION OF LERs FOR SAN ONOFRE-1 FOR THE PERIOD FROM  
JULY 1, 1982 TO MAY 30, 1983 TO ASSIST IN SALP REVIEW

- References:
1. Memorandum from K. V. Seyfrit to D. Sternberg, NRC,  
Subject: Evaluation of LERs for San Onofre-2 for the  
Period from July 1, 1982 to May 30, 1983 to Assist in  
SALP Review; dated June 10, 1983.
  2. Memorandum from K. V. Seyfrit to D. Sternberg, NRC,  
Subject: Evaluation of LERs for San Onofre-3 for the  
Period from July 1, 1982 to May 30, 1983 to Assist in  
SALP Review; dated June 10, 1983.

In response to R. H. Engelken's memorandum of March 8, 1983, AEOD evaluated the Licensee Event Reports for San Onofre, Unit 1 for the period July 1, 1982 to May 30, 1983. AEOD's review focused on the accuracy and completeness of the licensee's reporting. Since SONGS-1 was in a refueling outage since February 27, 1983, only 16 LERs were submitted during the evaluation period. The results of our review are as follows:

Reporting (July 1, 1982 to May 30, 1983)

Southern California Edison Company generally provided accurate and complete Licensee Event Reports, including relevant additional information in the transmittal letter. The licensee consistently provided follow-up information when such a commitment was made. The evaluations performed in References 1 and 2 for Units 2 and 3 pertaining to the adequacy of the reports and the numbering of the LERs are also applicable to Unit 1.

Although there were a relatively small number of LERs to evaluate, there are two areas that the Region should further evaluate in assessing the licensee's performance. First, fifty percent of the LERs were the result of personnel error. We could not ascertain whether this unusually large fraction of LERs is the result of the refueling outage, indicative of a management control problem, or a combination of these or some other reasons. The second area is the recurring failures in the saltwater cooling

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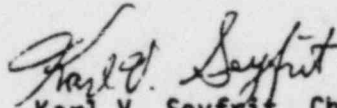
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We are aware of modifications planned by the licensee which are intended to improve system reliability. These modifications involve locking open the air operated discharge valves, and a redesign of the system piping to include check valves and manually operated valves. --

The licensee did not report any of the component failures to NPRDS. We recognize that reporting to NPRDS is not a requirement. However, Southern California Edison Company has committed to participate in NPRDS, and its failure to participate should be noted emphasizing that the success of NPRDS is dependent on its participation.

If you have any questions regarding this matter, please contact Wayne Lanning of my staff. Mr. Lanning can be reached at 492-4433.



Karl V. Seyfrit, Chief  
Reactor Operation Analysis Branch  
Office for Analysis and Evaluation  
of Operational Data

cc: W. Paulson, NRR