

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

APPROVED BY OMB NO. 3150-0104 EXPIRES MM/DD/YYYY

Estimated burden per response to comply with this mandatory information collection request 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Information and Records Management Branch (T-6 F33) U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If a document used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, information collection.

FACILITY NAME (1) San Onofre Nuclear Generating Station (SONGS) Unit 2	Docket Number (2) 05000-361	Page (3) 1 of 2
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TITLE (4): Oxygen Monitor Setpoint Exceeds Technical Specification (TS) Limits

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
09	11	1998	1998	-- 019	-- 00	10	08	1998	SONGS Unit 3	05000-362
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check One or More) (11)								
POWER LEVEL (10)	100	20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)		
		20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)		
		20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71		
		20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER		
		20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A		
		20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)				

LICENSEE CONTACT FOR THIS LER (12)

NAME R.W. Krieger, Vice President, Nuclear Generation	TELEPHONE NUMBER (Include Area Code) 949-368-6255
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

Yes (If yes, complete EXPECTED SUBMISSION DATE)	X	No	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-spaced typewritten lines) (16)

On September 11, 1998, during a review of changes to the waste gas system an engineer noted the existing alarm/trip setpoints were set to the same value as the Licensee-Controlled Specifications (LCS) limit and the setpoints did not incorporate total loop uncertainty (TLU) values. SCE had calculated TLU values in 1994 while resolving oxygen monitor out-of-tolerance issues. On September 11, 1998 (discovery date), SCE concluded the WGHS oxygen monitor setpoints did not comply, verbatim, with the LCS limit. Prior to implementation of the Technical Specification Improvement Project (TSIP) on August 5, 1996, the LCS had been part of the TS for Units 2 and 3 (TS 3.11.2.5 and 3.3.3.9, respectively). Therefore, SCE is reporting this event in accordance with 10 CFR 50.73(2)(a)(i).

Both the Oxygen monitor setpoints and the TS requirements have existed since original plant licensing (1982-1983). Due to the passage of time, SCE did not determine why TLU was not incorporated in the original TS limits. The WGHS oxygen concentration instrument setpoints were lowered to incorporate the calculated TLU.

(4-95)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
San Onofre Nuclear Generating Station (SONGS) Unit 2	05000-361	1998	-- 019 -	00	2 OF 2

Plant: San Onofre Nuclear Generating Station (SONGS) Unit 2 & 3
 Reactor Vendor: Combustion Engineering
 Discovery Date: September 11, 1998
 Discovery Time: Approximately 3:30 p.m.
 Unit 2 Unit 3
 Mode: Mode 1, "Normal Operations" Mode 1, "Normal Operations"
 Power: 100% 100%

Description of Event:

LCS 3.7.111, "Explosive Gas Mixture," requires the concentration of oxygen in the Waste Gas Holdup System (WGHS) to be less than or equal to two percent by volume. Also, LCS 3.3.107, "Explosive Gas Monitoring Instrumentation," requires alarm/trip setpoints to be set to ensure oxygen concentrations in the WGHS are less than or equal to two percent by volume when hydrogen concentrations are greater than four percent by volume.

On September 11, 1998, during a review of changes to the waste gas system an engineer [contractor, non-licensed] noted the existing alarm/trip setpoints were set to the same value as the LCS limit and the setpoints did not incorporate total loop uncertainty (TLU) values. SCE had calculated TLU values in 1994 while resolving oxygen monitor out-of-tolerance issues. On September 11, 1998 (discovery date), SCE concluded the WGHS oxygen monitor setpoints did not comply, verbatim, with the LCS limit.

Prior to implementation of the Technical Specification Improvement Project (TSIP) on August 5, 1996, LCS 3.7.111 and 3.3.107 had been part of the TS for Units 2 and 3 (TS 3.11.2.5 and 3.3.3.9, respectively). Therefore, SCE is reporting this event in accordance with 10 CFR 50.73(2)(a)(i).

Cause of the Event:

Both the Oxygen monitor setpoints and the TS requirements have existed since original plant licensing (1982-1983). Due to the passage of time, SCE did not determine why TLU was not incorporated in the original TS limits.

The working-level personnel involved with the 1994 TLU calculation are no longer employed by SCE. Consequently, SCE did not determine why this TS verbatim compliance issue was not recognized at that time.

Corrective Actions:

The WGHS oxygen concentration instrument setpoints were lowered to incorporate the calculated TLU.

Safety Significance:

This event did not impact the system's ability to maintain oxygen concentrations below the maximum safe percentage of oxygen by volume (5 percent). Consequently, although the oxygen setpoints did not comply, verbatim, with the TS limit of 2 percent by volume, there was no safety significance to this occurrence.

Additional Information:

LER 2-96-01 reported a hydrogen monitor for the WGHS was inoperable due to a blown fuse, a cause not present in this case.