ENCLOSURE 2

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket Nos.:	50-361 50-362
License Nos.:	NPF-10 NPF-15
Report No.:	50-361/97-11 50-362/97-11
Licensee:	Southern California Edison Co.
Facility:	San Onofre Nuclear Generating Station, Units 2 and 3
Location:	5000 S. Pacific Coast Hwy. San Clemente, California
Dates:	June 2-13 and August 4-7, 1997
Inspectors:	M. Murphy, Reactor Engineer, Operations Branch R. Lantz, Reactor Engineer, Operations Branch T. McKernon, Reactor Engineer, Operations Branch
Approved By:	J. Pellet, Chief, Operations Branch Division of Reactor Safety

ATTACHMENT: Supplemental Information

EXECUTIVE SUMMARY

San Onofre Nuclear Generating Station, Units 2 and 3
NRC Inspection Report 50-361/97-11; 50-362/97-11

This inspection included the licensee's implementation of improved Technical Specifications for both units, along with resolution of open issues developed because of problems with the licensee's program.

Engineering

- The licensee's self-assessment of Technical Specification surveillance program adequacy was comprehensive and detailed. The self-assessment resulted in the identification and correction of deficiencies not identified during the implementation of the Technical Specification improvement program (Section E3.2).

- The licensee's Technical Specification improvement program did not provide the guidance and oversight appropriate to the effort. This resulted in numerous examples of surveillance procedures that did not satisfy Technical Specifications (Sections E3.3, E3.4 & E8.1 & E8.2).

- The Technical Specification requirements listed for relocation in the licensee's conversion submittal relocated the specified locations except for five items in the administrative requirements area (Section E3.3).

- The program elements specifically required by the improved Technical Specifications were incorporated in the safety function determination program and that training provided covered the proper scope and functions of the program (Section E3.4).

- The licensee performed an extensive assessment to identify surveillance procedures that did not adequately implement the requirements of the new improved Technical Specifications, as well as, minor mistakes and inconsistencies with the bases and Updated Safety Analysis Report. The corrective actions taken and planned to resolve and correct the discrepancies identified by the self-assessment were found to be comprehensive and acceptable (Section E3.5).

DETAILS

Summary of Plant Status

Unit 2 operated throughout the onsite inspection period at 100 percent power.

Unit 3 remained in a refueling outage throughout the onsite inspection period.

I. Operations

E3 Engineering Procedures and Documentation

E3.1 General Comments (Temporary Instruction (TI)2515/130)

The inspectors reviewed the licensee's implementation of improved Technical Specifications, to ensure that it reflected the appropriate provisions or conditions of the NRC safety evaluation. As allowed by TI 2515/130, the inspectors reduced the scope of the reviews in the areas of verification of requirement relocation; review for adequacy of licensee procedures, programs, and manuals supporting relocations; evaluation of implementation controls; and, conversion verifications, based on the detailed coverage in the licensee's Technical Specification Improvement Program Self-Assessment, SEA 97-001.

E3.2 Review of Self-Assessment Audits

a. Inspection Scope (2515-130)

The inspectors reviewed the results of the licensee's Engineering Assessment Report SEA 97-001 dated May 12, 1997. The purpose of the self-assessment effort was to review Technical Specification surveillance requirements to verify that both the current surveillance procedure and the current test of record were in verbatim compliance with the Technical Specification requirements and the associated bases. The inspectors sampled the licensee's results to validate their accuracy, methodology, and completeness. Items reviewed included action requests, which initiated corrective actions and enhancements, including Technical Specification text improvement, surveillance procedures requiring revision or enhancement, design issues, reportable issues, and issues related to initial plant startup and operation.

b. Observations and Findings

The licensee's self-assessment of the Technical Specification improvement program was initiated as a result of issues related to the surveillance testing of the emergency diesel generators discussed in NRC Inspection Report 50-361;-362/96-18 and reported in Licensee Event Report 2-96-009. The licensee concluded that the Technical Specification improvement program project plan did not provide

adequate guidance and controls to prevent cognitive personnel errors. These issues involved surveillance testing compliance for the diesel generator governor droop-mode load rejection testing and diesel generator loading during the 24 hour run and hot restart test. The self-assessment included a review of all Technical Specifications and licensee controlled specification surveillance requirements to ensure: 1) agreement existed between each of the Unit 2 and Unit 3 Technical Specification surveillance requirements and associated bases; 2) agreement existed between the Unit 2 and Unit 3 licensee controlled specification surveillance requirements and associated bases; 3) verbatim compliance of the implementing surveillance procedure and maintenance order when applicable; 4) a test record existed which demonstrated the improved Technical Specification surveillance requirements were met for the current surveillance interval; and 5) valid reference documentation existed for required conversions.

The inspectors determined that the licensee's self-assessment was comprehensive and detailed. The necessary implementation methods, such as design change process, licensing action, 10 CFR 50.59 review, or procedure change process, were validated to have been implemented. For example, revision to Technical Specification Surveillance Requirement 3.8.1.8 and the associated bases for, "AC Sources-Operating," required the licensee to submit a licensing action request to the NRC requesting a change to the surveillance requirement test for alternate offsite power sources for each engineered safety feature 4.16 kV cross-tie between the two units. Similarly, the licensee changed licensee controlled specifications requirements through the 10 CFR 50.59 process for previous Technical Specification requirements that had been transferred to the licensee controlled specifications. For example, the old Technical Specification 4.3.3.7.3 requirement for testing of nonsupervisory circuits associated with fire detector alarms between instrumentation and the control room was transferred to Licensee Controlled Specification 3.3.106.1 and subsequently deleted because the facility did not have nonsupervisory circuits installed.

The self-assessment also included an independent review of each surveillance requirement. All issues were identified through the action request program and complex issues were reviewed by an expert panel. The self-assessment identified about 315 action requests, of which approximately 85 percent were completed at the time of this inspection. The nature of the most significant of these findings and the results of the licensee's root cause analysis are described in Section E8.1 of this report. The inspectors found the licensee's root causes to be valid.

In addition to the above, the licensee conducted special training for appropriate site personnel to reinforce management's expectations for performing effective reviews and ensuring verbatim compliance. Other specialized training was provided to personnel who made Technical Specification compliance reportability and operability determinations, and division managers were given training to verify Technical Specification requirements and their correct incorporation into procedures.

c. Conclusions

The inspectors concluded that the licensee's self-assessment was comprehensive and detailed. The self-assessment resulted in the identification and correction of deficiencies not identified during the Technical Specification improvement program.

E3.3 Verification of Requirement Relocation

a. Inspection Scope (2515/130)

The inspectors verified the relocation of existing requirements in the old Technical Specifications to the new locations as stipulated in Table 1 of the safety evaluation report for Amendments 127 and 116 to the licenses for Units 2 and 3, respectively.

b. Observations and Findings

The original sample of seven items reviewed identified two items that had not been relocated to the document listed in Table 1 of the safety evaluation report. Old Technical Specification 5.1.4, site boundary for liquid effluents, was listed as being relocated to the Updated Safety Analysis Report, but had been relocated to the offsite dose calculation manual. Likewise, old Technical Specification 6.8.1.e, emergency plan implementation, was listed as being relocated to the emergency plan, but had been relocated to the licensee controlled specifications.

The inspectors expanded the sample to 14 items and identified 3 additional items not relocated as stipulated in Table 1. The inspectors then sampled a total of 50 percent of the Table 1 list and found no additional relocation errors. The errors identified were in the administrative requirements area. This was discussed with the licensee and the inspectors were informed that there had been a telephone conversation between the licensee and the NRC on September 10, 1995, that resolved an open question raised at the proof and review meeting on September 7, 1995, concerning the relocation of administrative requirements. According to the licensee notes of that conversation provided to the inspectors, the NRC concluded that the final receptacle for relocated requirements would be up to the licensee except for two items, which were specifically identified to be placed in the topical plan. These two items were located in the topical plan. The inspectors found that the licensee did not communicate the intended points of relocation for all the administrative requirements to the NRC's Office of Nuclear Reactor Regulation prior to the issuance of the safety evaluation report for the amendments implementing the improved Technical Specifications.

c. Conclusions

The Technical Specification requirements listed for relocation in the licensee's conversion submittal were relocated to the specified location except for five items in the administrative requirements area. When this was discussed at the exit meeting, the licensee stated its intent to revise the docket so that Table 1 of the safety evaluation report for Amendments 127 and 116 to the Unit 2 and 3 licenses reflected the actual points of relocation for all elements of the Technical Specifications.

E3.4 Review of Procedures, Programs and Manuals

a. Inspection Scope (2515/130)

The inspectors reviewed the licensee's Operations Division Procedure SO123-0-13, "Technical Specification LCO Action Requirements (LCOAR) and Equipment Deficiency Mode Restraints (EDMR)," to assess the implementation of the licensee's safety function determination program contained in Section 6.10. This review also included associated records and personnel interviews.

b. Observations and Findings

The safety function determination program, as defined in the licensee's Administrative Procedure SO123-0-13, was found to contain the elements required by the Administrative Controls, Section 5, of the new Technical Specifications. The inspectors identified editorial or grammatical errors in Sections 6.10.5.2 and 6.10.5.3 that could create inconsistent identification of which system was should be classified as inoperable. Licensee staff agreed to consider construction of the procedure and determine whether procedure revision was appropriate.

The licensee had experienced no difficulties with the safety function determination program, with limited use of the program since the adoption of the new Technical Specifications. Interviews with licensed operators confirmed the lack of opportunities for practical use of the program. The operators were satisfied with the training received in the use of the safety function determination program.

c. Conclusions

The inspectors concluded that program elements specifically required by the new Technical Specifications were incorporated in the safety function determination program and that training provided covered the proper scope and functions of the program.

E3.5 Conversion Verifications

a. Inspection Scope (TI2515/130)

The inspectors reviewed a sample of the action request documents, generated by the licensee during its self-assessment of the improved standard Technical Specification surveillance requirements. The specific documents reviewed are identified in the supplemental information attached to this report.

b. Observations and Findings

The inspectors noted that Action Request 970101744, dated January 29, 1997, identified that there was no single surveillance requirement that verified a minimum flow capacity to the steam generators from the condensate storage tank through the auxiliary feedwater pumps. This requirement was added to the improved Technical Specification section 3.7.5, "AFW System," bases for Surveillance Requirement 3.7.5.5. The bases stated, in part, "This surveillance ensures that the flow path from the CST to the steam generators is properly aligned by requiring a verification of minimum flow capacity of 500 gpm at 1107 psia." The licensee revised this bases on May 30, 1997, to be consistent with existing Surveillance Procedure SO23-3-3.16.2, and deleted all reference to flowrate verification. The revised bases stated, "This surveillance ensures that the normal paths from the CST to the steam generators are operable by raising steam generator level by 2 percent using AFW flow from the CST."

The inspectors reviewed the process used by the licensee to change the bases for Surveillance Requirement 3.7.5.5. The licensee determined that the change would not create an unreviewed safety question and made the change effective May 30, 1997. The inspectors noted that the justification for removal of the flowrate requirement stated that the flowrate capability was verified by a combination of other means, including inservice testing, operations alignment verification, and system modeling in design calculations. The inspectors noted that this combination of activities would verify the ability to deliver flow from the condensate storage tank to the steam generators, but did not provide assurance that the flowrate would be verified after an outage of greater than 30 days, prior to reaching Mode 2. The licensee did not note that reliance on a combination of other activities did not provide assurance that the flowrate determination would be performed in all instances when described by the surveillance frequency bases.

The inspectors determined that the intent of Technical Specification Surveillance Requirement 3.7.5.5, as described in prior versions of the Technical Specifications, did not require a verification of design flowrate, and that the change made by the licensee was adequate to ensure system operability was maintained following an extended outage, when other system tests and verifications were performed as required. Additionally, the facility used auxiliary feedwater during startup, providing additional assurance of its functionality prior to entering Mode 2. The inspectors

concluded that the licensee's documentation of its justification for making the bases change could have more clearly established the minimal safety significance and lack of change of intent of the change as compared to the previous Technical Specifications. Despite this, the inspectors concluded that the licensee's justification for the bases change was adequate.

The inspectors asked the status of performing the inservice testing on Unit 3, which was in an extended outage. The licensee noted that the inservice testing that would verify the flowrate was not performed during the outage, nor was it planned to be performed before startup to Mode 1 was completed. After extensive discussions, the licensee decided to reinstate a requirement in the surveillance test that satisfied the surveillance requirement to measure the flow rate and confirm that it met the design requirements as part of the unit restart process. The inspectors determined that this had been completed prior to restart for Unit 3.

c. Conclusions

The review of nine licensee action requests, which are specifically identified in the supplemental information attached to this report, indicated that the licensee had made an extensive effort to identify surveillance requirements that did not adequately meet the requirements of the new improved Technical Specifications, as well as minor mistakes and inconsistencies with the bases and Updated Safety Analysis Report. The corrective actions completed and planned to resolve and correct the discrepancies identified by the self-assessment were comprehensive and acceptable.

E8 Miscellaneous Operations Issues (92700, 92901)

E8.1 (Closed) Licensee Event Report 361/97001-03: Multiple instances of failure of current surveillance requirements to implement the new standard Technical Specifications.

This revision amended the licensee event report to include 14 additional licensee identified examples where the new Technical Specification requirements were not adequately implemented by surveillance procedures. The licensee categorized the cause of these inadequacies in three cases. Case A (five examples) were attributed to inadequate project management of the Technical Specification improvement project. Case B (seven examples) were attributed to long standing plant problems, and Case C (two examples) were attributed to personnel errors in the last 7 years. In all cases, when properly tested with the appropriate procedure, the subject equipment satisfied the applicable Technical Specification Surveillance Requirements.

The inspectors reviewed the proposed corrective actions for the instances in which Technical Specification Surveillance Requirements were not adequately implemented by surveillance procedures. The inspectors also reviewed a sample of the action

requests generated by the licensee from their self-assessment of the new surveillance requirements. The inspectors concluded that the licensee's corrective actions provided reasonable assurance that surveillance requirement deficiencies were identified and corrected.

This licensee report compiled examples of surveillance procedures not satisfying Technical Specifications. These additional examples were identified by the licensee's corrective actions for the violation cited below and were not specifically cited.

E8.2 (Closed) Unresolved Item 50-361;-362/96018-02: Technical Specification improvement program surveillance requirements for implementation of emergency diesel generator and other surveillance tests not performed.

The inspectors reviewed the open item in NRC Inspection Report 50-361; -362/96-18. This also included subsequent issues identified in NRC Inspection Reports 50-361;-362/97-02 and 97-09. The unresolved issue related to Technical Specification surveillance deficiencies identified by the licensee after implementation of the new standard Technical Specifications.

NRC Inspection Report 50-361;-362/96-18 identified one issue concerning inadequate surveillance testing of the emergency diesel generators to meet new Surveillance Requirement 3.8.1.9, regarding frequency response following a single load reject during refueling outage. This issue was discussed further in NRC Inspection Report 50-361;-362/97-02 and Licensee Event Report 97001-01, -02, and -03. The inspectors determined that this instance was comparable to the examples cited for the violation below, in that the surveillance procedure was not adequate to satisfy the Technical Specification Surveillance Requirement 3.8.1.9, but this example was not specifically cited.

NRC Inspection Report 50-361;-362/97-02 identified several additional surveillance procedures as inadequate upon the implementation of Technical Specification improvement program. In summary, the emergency diesel generator 24-hour run (Technical Specification 3.8.1.14,) hot restart (Technical Specification 3.8.1.15,) full load reject (Technical Specification 3.8.1.10,) and 60 minute load run (3.8.1.3) are discussed in NRC Inspection Report 50-361;-362/97-02 and Licensee Event Report 9701-03. The corrected surveillances were conducted satisfactorily and the emergency diesel generators were demonstrated to be operable. Surveillance Requirement 3.1.5.4 (CEA reed switch position transmitter) was not adequately met by previous tests on both units. Surveillance Requirement 3.3.5.6 ("K" relay engineered safety features response-time testing) was also not adequately met by previous tests. Technical Specification amendment requests were submitted February 18 and 21, 1997, and both surveillance requirements were tested satisfactorily.

These examples are discussed in depth below. They represent multiple instances of licensee failure to ensure a proper surveillance procedure was written and conducted to meet the new Technical Specifications prior to their implementation. Individually, each of the examples had limited actual safety significance. For example, each emergency diesel was tested at a load higher than allowed, but also greater than required for its design function. Further, when tested correctly, each example was found to be operable. However, a large number of examples were identified and they were preventable through a properly implemented Technical Specification improvement program. Therefore, the six examples below were identified as examples of a violation of NRC requirements (50-361;-362/9711-01).

Example 1

Units 2 and 3 Improved Technical Specification Surveillance Requirement 3.8.1.14 required that, every 24 months, the licensee verify each emergency diesel generator "when operating with the maximum kVAR loading permitted during testing, operates for ≥ 24 hours, for ≥ 2 hours loaded ≥ 4935 kW and ≤ 5170 kW; and for the remaining hours of the test loaded ≥ 4450 kW and ≤ 4700 kW." Technical Specification 3.8.1 is applicable in Modes 1, 2, 3, and 4. Units 2 and 3 Improved Technical Specification Surveillance Requirement 3.8.2.1 required that, for alternating current sources required to be OPERABLE, the surveillance requirements of Technical Specification 3.8.1, "AC Sources-Operating," except Surveillance Requirements 3.8.1.17 and 3.8.1.20, are applicable.

From August 5 until December 1, 1996, in accordance with SO23-3-3.27.2, "Weekly Electrical Bus Surveillance," Revision 5, and SO23-3-3.23.1, "Diesel Generator Refueling Interval Tests," Revision 8, issued August 5, 1996, for Emergency Diesel Generators 2G002 and 2G003, and from August 5, 1996, until January 12, 1997, for Emergency Diesel Generators 3G002 and 3G003, the licensee had not verified that the emergency diesel generators operated for the remainder of the test loaded ≥ 4450 kW and ≤ 4700 kW. The emergency diesel generators were instead loaded > 4700 kW for the remainder of the tests.

Example 2

Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.1.15 required that, every 24 months, the licensee verify that within 5 minutes of having been shut down "after operating ≥ 2 hours loaded ≥ 4450 kW and ≤ 4700 kW," each emergency diesel generator "starts and achieves, in ≤ 10 seconds, voltage ≥ 3924 V and ≤ 4796 V, and frequency ≥ 58.8 Hz and ≤ 61.2 Hz; and operates ≥ 5 minutes." Technical Specification 3.8.1 is applicable in Modes 1, 2, 3,

and 4. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.2.1 required that, for alternating current sources required to be OPERABLE, the surveillance requirements of Specification 3.8.1, "AC Sources-Operating," except Surveillance Requirement 3.8.1.17 and Surveillance Requirement 3.8.1.20, are applicable.

In accordance with SO23-3-3.27.2, "Weekly Electrical Bus Surveillance," Revision 5, and SO23-3-3.23.1, "Diesel Generator Refueling Interval Tests," Revision 8, issued August 5, 1996, from August 5 until December 1, 1996, for Emergency Diesel Generators 2G002 and 2G003, and from August 5, 1996, until January 12, 1997, for Emergency Diesel Generators 3G002 and 3G003, the licensee had not verified that the emergency diesel generators started and achieved the voltage and frequency specified within 5 minutes of having been shutdown "after operating ≥ 2 hours loaded ≥ 4450 kW and ≤ 4700 kW." Instead, the emergency diesel generators had instead been loaded > 4700 kW, the allowed maximum, for the 2 hours prior to being shutdown for the test.

Example 3

Units 2 and 3 improved Technical Specification Surveillance Requirement 3.1.5.4 required that, every 24 months, the licensee perform a CHANNEL FUNCTIONAL TEST of each reed switch position transmitter channel.

In accordance with SO23-3-3.5, "CEA/Reactor Trip Circuit Breaker Operability Testing," Revision 6, issued August 5, 1996, from August 5 until November 30, 1996 (for Unit 2) and from August 5, 1996, until February 5, 1997 (for Unit 3), the licensee had not independently performed a channel functional test of each reed switch position transmitter indicator channel.

Example 4

Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.1.3 required that, every 31 days, the licensee verify that each emergency diesel generator synchronizes, loads, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW.

In accordance with SO23-3-3.23, "Diesel Generator Monthly Test," Revision 9, issued August 5, 1996, from August 5-14, 1996 (Emergency Diesel Generator 2G002), August 28, 1996 (Emergency Diesel Generator 2G003), August 21, 1996 (Emergency Diesel Generator 3G002), and August 8, 1996 (Emergency Diesel Generator 3G003), the licensee had not synchronized and loaded the emergency diesel generators ≥ 4450 kW and ≤ 4700 kW, and operated them for ≥ 60 minutes. The emergency diesel generators were instead loaded > 4700 kW for the tests.

Example 5

Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.1.10 required that, every 24 months, the licensee verify that each emergency diesel generator, when operating with design basis kW loading and maximum kVAR loading permitted during testing, does not trip and voltage is maintained ≤ 5450 V during and following a load rejection of ≥ 4450 kW and ≤ 4700 kW. Improved Technical Specification 3.8.1 is applicable in Modes 1, 2, 3, and 4. Units 2 and 3 improved Technical Specification Surveillance Requirement 3.8.2.1 required that, for alternating current sources required to be OPERABLE, the surveillance requirements of Specification 3.8.1, "AC Sources-Operating," except Surveillance Requirement 3.8.1.17 and Surveillance Requirement 3.8.1.20, are applicable.

In accordance with SO23-3-3.27.2, "Weekly Electrical Bus Surveillance," Revision 5, and SO23-3-3.23.1, "Diesel Generator Refueling Interval Tests," Revision 8, issued August 5, 1996, from August 5 until December 1, 1996 (Unit 2) and January 12, 1997 (Unit 3), the licensee did not verify that the emergency diesel generator did not trip and voltage was maintained following a load rejection of ≥ 4450 kW and ≤ 4700 kW. The load actually rejected for each emergency diesel generator was > 4700 kW.

Example 6

Units 2 and 3 old Technical Specification Surveillance Requirement 4.3.2.3 required that the engineered safety features response time of each engineered safety feature actuation system function shall be demonstrated to be within the limit at least once per refueling interval.

Units 2 and 3 improved Technical Specification Surveillance Requirement 3.3.5.6 required that, every 24 months on a staggered test basis, the licensee verify engineered safety features response time is within limits.

From approximately 1983 until November 30, 1996 (Unit 2), and from approximately 1984 until February 15, 1997 (Unit 3), in accordance with SO23-3-3.12, "Integrated ESF System Refueling Test," Revision 12, issued August 5, 1996, the license had not demonstrated the engineered safety features response times to be within limits, in that the actual response time of a portion of each circuit (the "K" relay) was not measured.

A number of additional instances of new surveillance requirements not being adequately satisfied following improved Technical Specifications implementation were identified by the licensee as part of its corrective actions and discussed in NRC Inspection Report 50-361;-362/97-02 and 97-09 and summarized below.

These are additional examples of the above violation and were not specifically cited because they were identified by the licensee as part of the corrective actions for the examples noted above.

- Surveillance Requirement 3.8.1.8 (verification of automatic and manual transfer of alternation current power sources...) was discussed in NRC Inspection Reports 50-361;-362/97-02 and 97-09, and Licensee Event Report 9701-03. The Technical Specification amendment was approved on June 2, 1997.

- Surveillance Requirement 3.7.8.4 (salt water cooling pump auto-start testing) was discussed in NRC Inspection Report 50-361;-362/97-02 and Licensee Event Report 9701-03. The surveillance was revised to meet the new requirements.

- Surveillance Requirement 3.3.7.1 (emergency diesel generator undervoltage channel check) was noted in NRC Inspection Report 50-361;-362/97-02 and discussed in Licensee Event Report 9701-01, which was closed in NRC Inspection Report 50-361;-362/97-02.

- Surveillance Requirement 3.8.1.13 (emergency diesel generator loss of voltage/SIAS test) was discussed in NRC Inspection Report 50-361; -362/97-02 and Licensee Event Report 9609-01. The Licensee Event Report was closed in NRC Inspection Report 97-02.

- Licensee Controlled Specification 3.4.102.3 (Reactor vessel head vent flow test) was discussed in NRC Inspection Report 50-361;-362/97-09 and Licensee Event Report 9701-03.

- Surveillance Requirements 3.3.7.4 and 3.3.7.3.b (emergency diesel generator loss of voltage channel test) was discussed in NRC Inspection Report 50-361;-362/97-09 and Licensee Event Report 9701-03.

- Pre Technical Specifications improvement program Technical Specification 4.8.4.1.a.1 (containment penetration conductor over-current protection devices) was discussed in NRC Inspection Report 50-361; -362/97-09 and Licensee Event Report 9701-03.

- Licensee Controlled Specification 3.3.106 (channel functional test of required fire detection instruments) was discussed in NRC Inspection Report 50-361; -362/97-09 and Licensee Event Report 9701-03.

E8.3 (Closed) Violation 50-361;-362/9711-01: Multiple examples of Technical Specification violations due to inadequate surveillance procedures following implementation of Technical Specification imp ovement program.

The licensee discussed the circumstances and c orrective action in Licensee Event Report 9701-03 and they were evaluated above. No additional information or further response was required.

V. Management Meetings

XI Exit Meeting Summary

The Inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on June 6 and 13, and August 20, 1997. The licensee acknowledged the findings presented. No proprietary information was identified.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

C. Anderson, Manager, Emergency Preparedness
D. Breig, Manager, Station Technical
J. Fee, Manager, Maintenance
M. Jones, Assistant Plant Superintendent
R. Krieger, Vice President Nuclear Generation
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M. Wharton, Manager, Engineering Design
C. Williams, Supervisor, Compliance

NRC

J. Sloan, Senior Resident Inspector

INSPECTION PROCEDURES USED

TI2515/130: Improved Standard Technical Specification Audits

IP92700: Onsite Followup of Written Reports of Nonroutine Events at Power Reactor Facilities

IP92901: Followup - Plant Operations

ITEMS OPENED AND CLOSED

Opened and Closed

50-361;-362/97-011-01	VIO	Multiple examples of Technical Specification Violation due to inadequate surveillance procedures following implementation of Technical Specifications improvement program (E8.2).

Closed

50-361;-362/97-001-03	LER	Multiple instances of failure of current surveillance requirements to implement the new standard Technical Specifications.
50-361;-362/96-018-02	URI	Technical Specification improvement program surveillance requirements implementation/emergency diesel generator and other surveillance tests not performed.

LIST OF DOCUMENTS REVIEWED

Action Requests:

97100510,	970100642,	970100956,
970101010,	970101326,	970200859,
970200878,	970201154,	970201622

Field Change Notice:

2G002, F13275E, F13257E, F13278E, "DG Governor Modifications Unit 3 Train A," dated February 19, 1997

Procedure SO123-0-13, "Technical Specification LCO Action Requirements (LCOAR) and Equipment Deficiency Mode Restraints (EDMR)," Revision 3, dated November 8, 1996

Procedure SO23-3-3.5, "CEA/Reactor Trip Circuit Breaker Operability Testing," Revision 6, dated August 5, 1996

Procedure SO23-3-3.12, "Integrated Engineered Safety Features System Refueling Test," Revision 14, dated May 17, 1997

Procedure SO23-3-3.23, "Diesel Generator Monthly Test," Revision 9, dated August 5, 1996

Procedure SO23-3-3.23.1, "Diesel Generator Refueling Interval Tests," Revision 8, dated August 5, 1996

Procedure SO23-3-3.27.2, "Weekly Electrical Bus Surveillance," Revision 5, dated August 5, 1996

Procedure SO23-3-3.31.10, "Miscellaneous Systems Valves Testing- Cold Shutdown and Refueling Interval"

Procedure SO2-II-11.1A, "Surveillance Requirements Unit 2 Engineered Safety Features Train A Loss of Voltage (LOVS), Degraded Voltage (SDVS, DGVSS) and Sequencing Relays and Circuit Tests," Revision 0, dated May 29, 1996

Open Item Request OIR 92-262, "Detection Required by Technical Specification," dated May 23, 1997

SONGS Engineering Assessment Report SEA 97-001, "Self-Assessment Implementation of SONGS 2/3 Technical Specification Surveillance Requirements"