

## 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 (1-6 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) <b>San Onofre Nuclear Generating Station (SONGS) Unit 1</b>	Docket Number (2) <b>05000-206</b>	Page (3) <b>1 of 4</b>
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TITLE (4): Diesel Fuel Filtration Unit Access not Controlled as a Vital Area

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
02	19	1998	1998	-- 002 --	00	03	20	1998	Unit 2	05000-361
									Unit 3	05000-362

OPERATING MODE	NA	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check One or More) (11)			
		20.2201(b)	20.2203(a)(2)(v)	50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)	NA	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)	X 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
		20.2203(a)(2)(iv)	50.36(c)(2)	50.73(a)(2)(vii)	or in NRC Form 366A

## LICENSEE CONTACT FOR THIS LER (12)

NAME <b>R.W. Krieger, Vice President, Nuclear Generation</b>	TELEPHONE NUMBER (Include Area Code) <b>714-368-6255</b>
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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)				EXPECTED SUBMISSION DATE (15)	MONT	DA	YEAR
Yes (If yes, complete EXPECTED SUBMISSION DATE)	X	No					

## ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-spaced)

As reported in LER 2-1998-004, the fuel oil for one Diesel Generator tested high for particulates in February 1998. To reduce the fuel oil particulates, SCE began filtering the fuel oil using a skid (truck) mounted filtration system.

On February 19, 1998, at approximately 5:15 p.m. PST, in response to an NRC observation, SCE conservatively determined the filtration skid should have been posted by security personnel. A security officer was already posted at the DG fuel oil storage tank fill vault, which had its vault plug removed (i.e., allowing access to a vital area). However, the filtration system itself was not observable by the security officer posted at the tank fill vault.

The apparent cause of this event was inadequate training. Security evaluators (utility, non-licensed) and reviewers (utility, non-licensed), had not been trained in the concept of "vital materials" such that they would recognize that the temporary filtration system required protection as a vital area.

Security personnel will be trained on the concept of vital materials.

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(4-95)

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Plant: San Onofre Nuclear Generating Station (SONGS) Unit 1, 2 and 3  
Reactor Combustion Engineering  
Event Date: February 19, 1998  
Event Time: 5:15 p.m.  
Mode: Unit 1 - Permanently Defueled  
Unit 2 - Mode 5 - "Cold Shutdown"  
Unit 3 - Mode 1 - "Power Operation"  
Power: Unit 2 - 0%  
Unit 3 - 100%

**Description of Event:**

As reported in LER 2-1998-004, the fuel oil (DC) for one Diesel Generator (DG) (EK) tested high for particulates in February 1998. To reduce the fuel oil particulates, SCE began filtering the fuel oil using a skid (truck) mounted filtration system.

On February 19, 1998, at approximately 5:15 p.m. PST (discovery date), in response to an NRC observation, SCE conservatively determined the filtration skid should have been posted by security personnel. A security officer was already posted at the DG fuel oil storage tank fill vault, which had its vault plug removed (i.e., allowing access to a vital area). However, the filtration system itself was not observable by the security officer posted at the tank fill vault.

10 CFR 73.2 defines a vital area as "any area which contains vital equipment," and vital equipment as "any equipment, system, device, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation. Equipment or systems which would be required to function to protect public health and safety following such failure, destruction, or release are also considered to be vital."

A one hour notification of this event was made to the NRC Operations Center (Log # 33753) at 6:09 p.m. PST, on February 19, 1998. Consequently, this follow-up report is being made in accordance with 10 CFR 73.71.

**Cause of the Event**

The apparent cause of this event was inadequate training. Security evaluators (utility, non-licensed) and reviewers (utility, non-licensed), had not been trained in the concept of "vital materials" such that they would recognize that the temporary filtration system required protection as a vital area.

**Corrective Actions**

1. A Security Post was established for continuous observation of the filtration skid.
2. SCE concluded, through a review of the filtration setup, that tampering did not occur during fuel filtration and the affected emergency diesel generator remained operable during the filtration process.
3. Confirmatory fuel sampling was performed to verify the fuel in tank 2T036 met TS limits.
4. Security personnel will be trained on the concept of vital materials.

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U.S. NUCLEAR REGULATORY COMMISSION

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5. A root cause evaluation is being performed and additional corrective actions may be taken as necessary.

Safety Significance

During the filtration process, Foreign Material Exclusion (FME) controls were in place to ensure that foreign materials were not introduced into the fuel oil through the filtration system setup. These controls included inspection of the hoses and filtration vessels for cleanliness. As noted above, confirmatory fuel sampling was performed, which verified the fuel in tank 2T036 met TS limits. Therefore, there was no safety significance for this occurrence.

Additional Information

In the past three years, there have been no other licensee Event Reports submitted for inadequate posting of vital area boundary extensions.



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U.S. NUCLEAR REGULATORY COMMISSION

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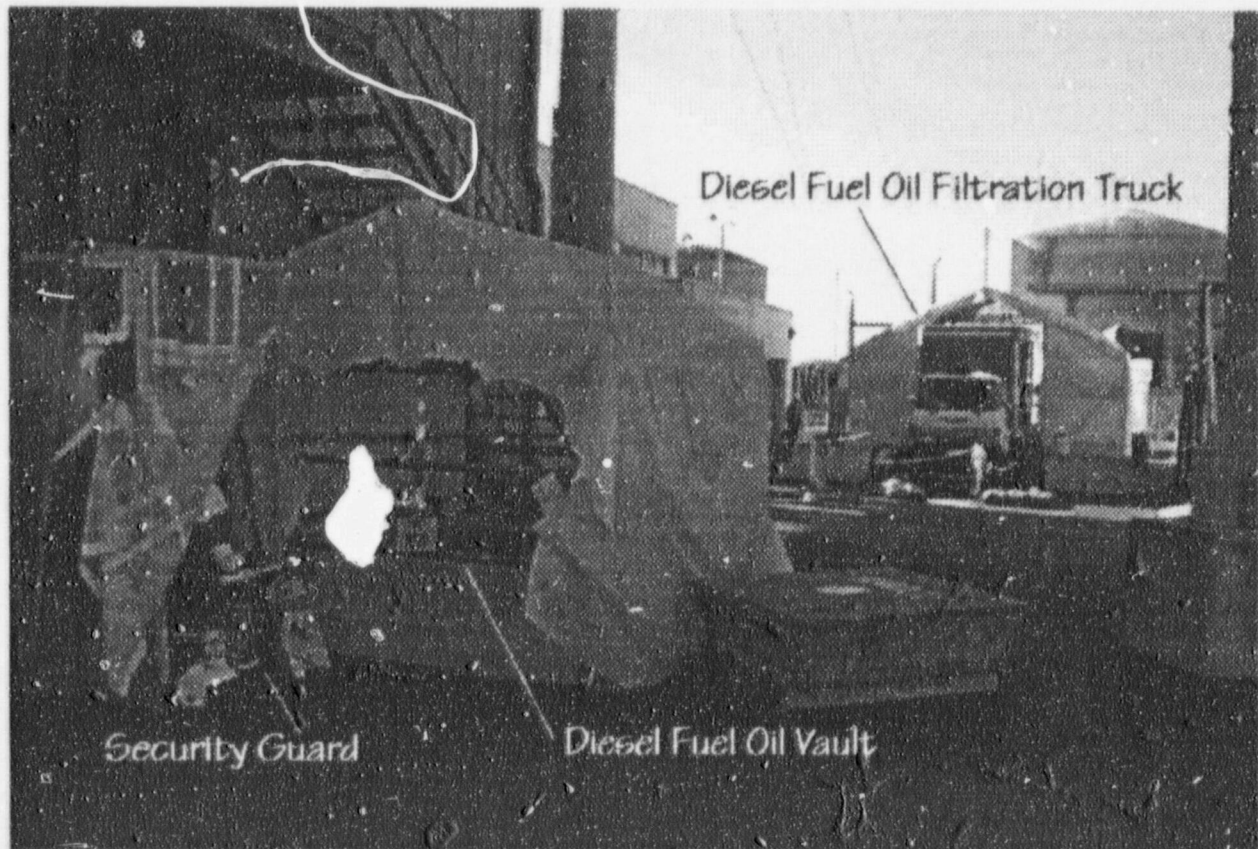


Figure 1

Diesel Fuel Oil Filtration Setup