

November 30, 1999

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

Subject: **Docket Nos. 50-361 and 50-362**
30-Day Report
Licensee Event Report No. 1999-007
San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

This submittal provides a 30-day Licensee Event Report (LER) describing missed Technical Specification Surveillances. While this occurrence is applicable to both Units 2 and 3, a single report for Unit 3 (the most affected unit) is being submitted in accordance with Section 5.2.3(8) of NUREG-1022, Rev. 1. Neither the health nor the safety of plant personnel or the public was affected by this occurrence.

Any actions listed are intended to ensure continued compliance with existing commitments as discussed in applicable licensing documents; this LER contains no new commitments. If you require any additional information, please so advise.

Sincerely,



LER No. 1999-007

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
Institute of Nuclear Power Operations (INPO)

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FOR APPROVAL 0500361

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NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (MMM-YYYY) 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 3					Docket Number (2) 05000-362		Page (3) 1 of 3			
TITLE (4): Missed Technical Specification Surveillances - Aux Feedwater Pump										
EVENT DATE (5)			LER NUMBER (6)			REPORT DATE			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
11	02	1999	1999	-- 007	-- 00	11	30	1999	SONGS Unit 2	05000-361
									FACILITY NAME	DOCKET NUMBER
OPERATING MODE		1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (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			
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)		MONTH	DAY	YEAR
Yes (If yes, complete EXPECTED SUBMISSION DATE)				X	No					

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

On 11/2/99, SCE determined that Technical Specification Surveillance Requirement 3.7.5.2 for AFW pump 3P141 was not performed within the specified 31 day interval required by the staggered SR basis. 3P141 should have been tested by 10/11/99. Because the required TS Surveillance was not performed in accordance with TS 3.7.5.2, SCE is reporting this occurrence pursuant to 10CFR50.73(a)(2)(i)(B).

SCE completed testing of 3P141 in accordance with TS SR 3.7.5.2 on 11/2/99. Because AFW pump 3P141 passed its required TS surveillance, the pump was able to perform its intended safety function and there was no safety significance to this issue.

(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 3	05000-362	1999	-- 007 --	00	2 of 3

Plant: San Onofre Nuclear Generating Station (SONGS) Units 2 and 3
Discovery Date: November 2, 1999
Reactor Vendor: Unit 2 Combustion Engineering Unit 3 Combustion Engineering
Mode: Mode 1 - power operation Mode 1 - power operation
Power: 100 percent 100 percent

Background:

The Unit 3 Auxiliary Feedwater (AFW) System [BA] consists of two motor driven AFW pumps [P] (S31305MP141 and S31305MP504) and one steam turbine driven pump (S31305MP140). Each AFW pump provides 100% of AFW flow assumed in the accident analysis.

Technical Specification (TS) Surveillance 3.7.5.2 requires SCE to "verify the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head." This requirement has a stated frequency of "31 days on a STAGGERED TEST BASIS." The "STAGGERED TEST BASIS" is defined in the TS:

"A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during n Surveillance Frequency intervals, where n is the total number of systems, subsystems, channels, or other designated components in the associated function."

Description of the Event:

On November 2, 1999, (discovery date), SCE determined that Technical Specification (TS) Surveillance Requirement (SR) 3.7.5.2 for AFW pump 3P141 was not performed within the specified 31 day interval required by the staggered SR basis (AR 991100156). Plant records indicate these pumps were surveilled as follows:

Pump	Last Surveillance Date
3P141	8/17/99
3P140	8/25/99
3P504	9/2/99

Thus, 3P141 should have been tested again by 10/11/99 (31 days plus 25 percent after 3P504 was tested or 38.75 days). However, because the required TS Surveillance was not performed in accordance with TS 3.7.5.2, SCE is reporting this occurrence pursuant to 10CFR50.73(a)(2)(i)(B).

Cause of the Event:

This error occurred because the Operations Surveillance Compliance Administrative Report (OSCAR) had not been programmed to schedule the "staggered" AFW pump TS SR (cognitive personnel error, Utility non-licensed).

On August 5, 1996, SCE implemented the Technical Specification Improvement Project (TSIP) which added the staggered test basis requirement to the AFW TS SR. At that time, SCE personnel incorporated the staggered test basis into the baseline AFW pump SR schedule but did not incorporate the staggered test frequency into OSCAR. Consequently, when the AFW pump baseline SR schedule was perturbed (for unrelated reasons), SCE personnel did not maintain the surveillances on the staggered 31 day interval.

NRC FORM 366A		LICENSEE EVENT REPORT (LER)			U.S. NUCLEAR REGULATORY COMMISSION	
(4-95)		TEXT CONTINUATION				
FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)	
San Onofre Nuclear Generating Station (SONGS) Unit 3	05000-362	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 of 3	
		1999	-- 007 --	00		

Corrective Actions:

The following corrective actions have been completed:

1. SCE completed testing of 3P141 in accordance with TS SR 3.7.5.2 on November 2, 1999.
2. SCE confirmed that only "staggered" surveillances scheduled using OSCAR were affected by this error. Except as noted in the additional information section below, all other "staggered" SRs were reviewed and confirmed to have been completed as required.
3. SCE has added the staggered TS SR requirement to OSCAR.
4. SCE confirmed that the TS SR program controlling staggered test basis surveillances for other TS systems has been and remains adequate to meet the requirements of the TS.

Safety Significance:

Because AFW pump 3P141 passed its required TS surveillance, the pump was able to perform its intended safety function. Therefore, there was no safety significance to this issue.

Additional Information:

During the investigation of the condition reported herein, SCE discovered 3 past Unit 2 AFW pump TS surveillances that had been performed late (after implementation of TSIP). Similar to the Unit 3 occurrence reported herein, these late Unit 2 surveillances: (1) were scheduled using OSCAR, and (2) did not meet the staggered 31 day interval. For each occurrence, SCE confirmed that the affected pump passed its surveillance when completed. Because the subsequent TS surveillances were satisfactory, there was no safety significance to these events. The actions to correct the Unit 3 occurrence will also correct the Unit 2 occurrences.

On August 5, 1996, SCE implemented TSIP. Prior to TSIP implementation, the fire water system TS SR required "staggered" testing of the electric driven fire water pumps (TSIP relocated this requirement to the Licensee Controlled Specification). During the investigation of the event reported herein, SCE noted the "staggered" SR requirement for the electric driven fire water pumps was not incorporated into the pre-TSIP TS SR program. Consequently, it is possible that one or more "staggered" surveillances for the electric driven fire water pumps were not performed within the TS required SR schedule. However, because of the increased SR testing required by the pre-TSIP definition of "staggered test basis" (see definition below), SCE believes this potential is very limited. Additionally, due to the passage of time, SCE did not determine the cause of this pre-TSIP omission.

Prior to TSIP, Staggered Test Basis was defined as:

- "A. A test scheduled for n systems, subsystems, trains, or other designated components obtained by dividing the specified test interval into n equal subintervals, and
- B. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval."

The definition of staggered test basis was revised by TSIP as noted above.