



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONAL Company

R. W. Krieger
Vice President
Nuclear Generation

December 9, 1999

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

Subject: **Docket No 50-361 and 50-362**
 Voluntary Report
 Licensee Event Report No. 1999-006
 San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

This submittal provides a voluntary Licensee Event Report (LER) describing a potential conflict between two different Technical Specifications. Because this occurrence is applicable to both Units 2 and 3, a single report for Unit 2 is being submitted in accordance with NUREG-1022, Rev. 1. Neither the health nor the safety of plant personnel or the public was affected by this occurrence or condition.

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. 1999-006

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)

P. O. Box 128
San Clemente, CA 92674-0128
714-368-6255
Fax 714-368-6183

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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 2					Docket Number (2) 05000-361		Page (3) 1 of 1				
TITLE (4): Pressurizer Heaters and EDG Power requirements - Voluntary Report											
EVENT DATE (5) MONTH DAY YEAR			LER NUMBER (6) YEAR SEQUENTIAL NUMBER REVISION NUMBER			REPORT DATE MONTH DAY YEAR			OTHER FACILITIES INVOLVED (8) FACILITY NAME DOCKET NUMBER		
11 22 1999			1999 -- 006 -- 00			12 10 1999			SONGS Unit 3 05000-362		
OPERATING MODE		1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check One or More) (11)					DOCKET NUMBER		
POWER LEVEL (10)		100		20.2201(b)		20.2203(a)(2)(v)		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)		<input checked="" type="checkbox"/> OTHER: Voluntary	
				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)											
Yes (If yes, complete EXPECTED SUBMISSION DATE)				<input checked="" type="checkbox"/> No		EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	

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

On September 9, 1998, the NRC issued Amendments 141 and 133 which changed the Technical Specification (TS) allowed out of service time limit for an emergency diesel generator (EDG) (EK) from 72 hours to 14 days.

Prior to November 22, 1999, TS 3.4.9 required two groups of pressurizer (PZR) heaters be capable of being powered from an emergency power supply. If one group of pressurizer heaters became inoperable, this TS required the affected group to be restored to operable status within 72 hours. Recently, SCE became aware that the TS wording "capable of being powered from an emergency power supply" could be interpreted to mean "from an Operable EDG." Consequently, SCE requested a TS amendment to remove this phrase. This request was granted by the NRC on November 22, 1999 (Amendments 161 and 152).

Using the alternate TS interpretation listed above, TS 3.4.9 could have required SCE to declare a pressurizer heater group inoperable whenever its associated EDG was out of service. Because there may have been one or more instances when an EDG was out of service for more than 72 hours between the two dates listed above, SCE is voluntarily providing this report to the NRC.

There is no safety significance to this issue. In amendments 161 and 152, the NRC stated that removing this phrase was acceptable because (1) the pressurizer heaters are permanently installed on Class 1E safety-related buses, (2) this design is described in the Updated Final Safety Analysis Report and the TS Bases, (3) the relevant TMI action item requirements continue to be met, and (4) the change is consistent with the CE Standard Tech Specs. No corrective actions beyond this TS amendment are required.

There have been no similar TS conflicts reported within the past 2 years.