

San Onofre 2

3Q/2003 Plant Inspection Findings

Initiating Events

Significance:  Feb 01, 2003

Identified By: Self Disclosing

Item Type: FIN Finding

Loss of generator excitation trip - Unit 2

The licensee failed to have an adequate preventive maintenance procedure to conduct functional testing of the Unit 3 main transformer/generator protective relays. As a result, a maintenance technician inadvertently caused a reactor trip of Unit 2.

This self-revealing finding was considered to be more than minor because it resulted in an unnecessary challenge to the reactor protective system and upset plant stability. However, the finding was considered to have very low safety significance because the reactor trip was uncomplicated; operations personnel quickly placed the plant in a stable shutdown condition; and mitigating equipment responded as designed.

Inspection Report# : [2003002\(pdf\)](#)

Mitigating Systems

Significance:  Jul 11, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to promptly identify and correct linestarter degradation

A noncited violation of 10 CFR Part 50, Appendix B, Criterion XVI, was identified as a result of inadequate corrective actions in response to the improper use of trichloroethane-based cleaners during linestarter maintenance. This resulted in unnecessary degradation of safety-related linestarter auxiliary contacts.

This issue was considered more than minor because the damage caused by improper maintenance practices to safety-related linestarters, if left uncorrected, could lead to a more significant safety concern in that a risk-significant valve could fail to perform its safety function. The finding was characterized under the Significance Determination Process as having very low safety significance because there was no actual impact on the safety-related function of any Unit 3 valve. Additionally, the results of the inspection of the remaining Unit 2 risk dominant valves, completed on July 11, 2003, did not result in any additional test failures.

Inspection Report# : [2003004\(pdf\)](#)

Significance:  Mar 28, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Incorrect lubricating oil used in AFW Pump 2P504

The inspectors identified a noncited violation of 10 CFR Part 50, Appendix B, Criterion XVI, because the licensee implemented inadequate corrective actions to address several instances where incorrect oil was used in safety-related equipment. The inadequate corrective actions resulted in the introduction of incorrect bearing lubricating oil in Auxiliary Feedwater Pump 2P504 during an oil change.

The inspectors determined that the finding had a credible impact on the mitigating systems cornerstone because it resulted in an unnecessary extension of the unavailability of Auxiliary Feedwater Pump 2P504. The issue was determined to be more than minor because, if left uncorrected, the availability and reliability of a portion of the auxiliary feedwater system could be compromised in that excessive pump bearing temperatures could have been reached. Furthermore, the inadequate corrective actions could increase the likelihood of incorrect oil being introduced in safety-related equipment. The finding was determined to have very low safety significance because Auxiliary Feedwater Pump 2P504 was restored to operable status within its Technical Specification allowed outage time.

Inspection Report# : [2003003\(pdf\)](#)



Significance: Dec 29, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

High pressure safety injection header isolation valve failure to open during testing

The inspectors determined that the licensee implemented an inadequate procedure that did not ensure that electrical leads in safety-related circuitry were properly landed.

A inspector-identified noncited violation of Technical Specification 5.5.1.1 was identified. The finding was considered to be more than minor because the reliability and capability of a portion of the safety injection system was compromised when high pressure safety injection header Isolation Valve 2HV9323 failed to open on a simulated safety injection actuation signal. However, the finding was determined to have very low safety significance because the other three Train B high pressure safety injection header isolation valves were operable and capable of opening on a safety injection actuation signal to allow injection into the reactor coolant system. As a result, the actual safety function of the Train B safety injection system remained intact because only two of the four valves were needed.

Inspection Report# : [2003002\(pdf\)](#)

Barrier Integrity

Emergency Preparedness

Significance: SL-IV Apr 01, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Change to EAL C3 resulting in decrease in effectiveness of EP in violation of 10 CFR 50.54(q)

Between March 3 and April 25, 2003, the licensee implemented a change to Emergency Action Level C3 which constituted a decrease in effectiveness of the emergency plan because two conditions which would previously have resulted in site area emergency classification would not be classified by the revised emergency action level.

Implementation without prior NRC approval of changes to the emergency plan which constitute reduction in the effectiveness of the plan was a noncited violation of 10 CFR 50.54(q).

The finding was evaluated using NUREG-1600, "General Statement of Policy and Procedure for NRC Enforcement

Actions," Section IV, because licensee reductions in the effectiveness of its emergency plan impact the regulatory process. The finding had greater than minor significance because deletion of conditions indicative of a site area emergency has the potential to impact safety. The finding was determined to be a noncited Severity Level IV violation because the emergency action level change constituted a failure to implement an emergency planning standard and did not constitute a failure to meet an emergency planning standard as defined by 10 CFR 50.47(b). This finding has been entered into the licensee's corrective action program as Action Request 030400514.

Inspection Report# : [2003003\(pdf\)](#)

Significance:  Nov 08, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

Procedures inadequate to implement a site area emergency action level

A noncited violation of 10 CFR Part 50, Appendix E IV.B was identified for inadequate procedures for implementation of an emergency action level. EAL C.3.1(c) requires that a site area emergency be declared if radiation readings outside of containment exceed established levels. These locations are not monitored by installed devices and licensee procedures do not require these readings to be taken.

The finding was determined to be a performance deficiency in that the licensee failed to identify that, during certain plant conditions, the emergency response procedures would not evaluate EAL C.3.1(c.) The finding was evaluated using the Emergency Preparedness Significance Determination Process to be more than minor because failure to evaluate a potential SAE could result in delayed facility and public evacuations. The finding was evaluated as having very low safety significance, since it was a failure of a regulatory requirement but not a failure to meet an emergency planning standard. This violation is being treated as a noncited violation in accordance with Section VI.A of the NRC Enforcement Policy.

Inspection Report# : [2002006\(pdf\)](#)

Occupational Radiation Safety

Public Radiation Safety

Physical Protection

Significance: N/A Nov 15, 2002

Identified By: NRC

Item Type: FIN Finding

Verification of Compliance With Interim Compensatory Measures Order

On February 25, 2002, NRC imposed by Order Interim Compensatory Measures that addressed waterborne threats, vehicle bombs, insider threats, land-based assaults, and mitigative measures. The inspectors determined that, overall, the licensee appropriately: evaluated the impact of the interim design basis explosive on the site; incorporated the Interim Compensatory Measures into the site protective strategy and access authorization program; developed and implemented relevant procedures; evaluated the impact of losses of large areas of the site and vulnerabilities of their computer systems; ensured that the emergency plan could be implemented; and established and effectively coordinated

interface agreements with offsite organizations.

Inspection Report# : [2002013\(pdf\)](#)

Miscellaneous

Last modified : December 01, 2003