

March 14, 2000

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

**Subject: Docket Nos. 50-361 and 50-362  
Special 30-Day Report  
Licensee Event Report No. 2000-001  
San Onofre Nuclear Generating Station, Units 2 and 3**

Gentlemen:

This letter provides a Special 30 Day Report (Licensee Event Report 2000-001) required by the plant's Technical Specification and 10CFR50.73(a)(2)(i) for an occurrence involving an inoperable Post Accident Monitoring instrument. The event reported herein occurred in Unit 3. However, the cause is applicable to Unit 2, and could possibly have resulted in a similar occurrence in Unit 2. Therefore, a single Unit 3 report is being submitted for both units in accordance with the guidance provided in NUREG-1022, Rev 1.

The health and safety of neither the public nor plant personnel were 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,

*R. Walds for R.W. Krieger*

LER No. 2000-001

cc: E. W. Merschoff, Regional Administrator, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, Units 2 and 3

*IE22*

<b>NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION</b> <b>(MMM-YYYY)</b> <b>LICENSEE EVENT REPORT (LER)</b>  (See reverse for required number of digits/characters for each block)	<b>APPROVED BY OMB NO. 3150-0104 EXPIRES MM/DD/YYYY</b> 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.
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<b>FACILITY NAME (1)</b> <b>San Onofre Nuclear Generating Station (SONGS) Unit 3</b>	<b>Docket Number (2)</b> <b>05000-362</b>	<b>Page (3)</b> <b>1 of 4</b>
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**TITLE (4): Inoperable Post Accident Monitoring Instrument**

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
02	18	2000	2000	-- 001	-- 00	03	14	2000	<b>SONGS 2</b>	<b>05000-361</b>
									FACILITY NAME	DOCKET NUMBER

<b>OPERATING MODE</b>  <b>POWER LEVEL (10)</b>	<b>1</b>	<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check One or More) (11)</b>								
		20.2201(b)		20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	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		
		20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		<b>Special Report</b>		
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)					

LICENSEE CONTACT FOR THIS LER (12)	
<b>NAME</b> <b>R.W. Krieger, Vice President, Nuclear Generation</b>	<b>TELEPHONE NUMBER (Include Area Code)</b> <b>949-368-6255</b>

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)	<input checked="" type="checkbox"/>	No					

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

On 2/18/2000, SCE determined that on 3/5/98, Unit 3's RCS Hot Leg Wide Range Temperature recorder 3TR0911X1 was declared inoperable and was not corrected until April 15, 1998 (greater than the 30 days allowed by TS 3.3.11 Action A.1). Because the specified action time was not met, this Special Report is being submitted in accordance with TS 3.3.11 Action B.1. and in accordance with 10CFR50.73(a)(2)(i).

The cause of 3TR0911X1 being declared inoperable in March 1998 was the take up spool upper retaining plate return tension spring was broken. The broken spring had the potential to affect the required trending capability of the recorder. The cause of the broken spring was not determined in March 1998, and, due to the passage of time, was not determined at this time. A Special Report, as required by TS 3.3.11 Action B.1, was not submitted in 1998 due to a procedure error.

SCE repaired recorder 3TR0911X1 and returned it to operable status on April 15, 1998. SCE corrected the procedure error on February 18, 2000.

The safety significance of this event was minimal.

(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	2000	-- 001 --	00	2 of 4

Plant:	Unit 2	Unit 3
Event Date:	March 5, 1998	
Discovery Date:	February 18, 2000	
Reactor Vendor:	Combustion Engineering	Combustion Engineering
Mode:	1, power operation	1, power operation
Power:	99.9 percent	99.9 percent

## Background:

Technical Specification (TS) 3.3.11, Post Accident Monitoring Instrumentation (PAMI), requires, among other things, two channels (1 per steam generator) of the Reactor Coolant System (RCS) Hot Leg Temperature instruments to be operable in Modes 1, 2, and 3. The Bases of TS 3.3.11 states:

“The operability of PAMI ensures that there is sufficient information available on selected plant parameters to monitor and assess plant status and behavior following an accident. The availability of PAMI is important so that responses to corrective actions can be observed and the need for, and magnitude of, further actions can be determined. These essential instruments are identified by plant specific documents addressing the recommendations of Regulatory Guide 1.97, Revision 2, as required by Supplement 1 to NUREG-0737, “TMI Action Items.”

“RCS Hot and Cold Leg Temperatures are Category I variables provided for verification of core cooling and long term surveillance.”

With respect to Regulatory Guide 1.97, Revision 2, and RCS Hot Leg Temperatures, SCE is committed to providing both indication and trending. The RCS Hot Leg Temperature trending function Channel A for SONGS Unit 3 is provided by recorder 3TR0911X1.

TS 3.3.11 Action A.1 requires an inoperable RCS Hot Leg Temperature instrument be restored to operable status within 30 days. If Action A.1 is not met, Action B.1 requires a Special Report be submitted to the NRC in accordance with TS 5.7.2 within 30 days.

TS 5.7.2 states that “[w]hen a pre-planned alternate method of monitoring post-accident instrumentation functions is required by Condition B ... of LCO 3.3.11, a report shall be submitted within 30 days from the time the action is required.”

## Description of the Event:

On January 28, 2000, at approximately 16:00 PST, Unit 2's RCS Hot Leg Wide Range Temperature recorder 2TR0911X1 was declared inoperable when its indication incorrectly jumped up 10 degrees F. On February 8, 2000, an NRC Resident Inspector observed the inoperable recorder (AR000101672), and questioned whether Unit 2 should be in a 30 day action in accordance with PAMI TS 3.3.11, because the recorder is necessary for trending capability.

Subsequently, Southern California Edison (SCE) determined 2TR0911X1 was, in fact, identified as an essential instrument, and therefore, TS 3.3.11 Condition A was applicable. The Unit entered the TS 3.3.11 Action A.1. at 12:25 PST on February 11, 2000. The recorder was returned to operable status at 14:38 PST on February 11, 2000, before the 30 day completion time expired.

(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	2000	-- 001 --	00	3 of 4

On February 18, 2000 (discovery date), SCE determined that on March 5, 1998 (event date), Unit 3's 3TR0911X1 was declared inoperable and was not corrected until April 15, 1998 (greater than 30 days) (AR980300391). Because the Condition A. action time was not met, this Special Report is being submitted in accordance with TS 3.3.11 Action B.1. The Licensee Event Report (LER) format is being used in accordance with the guidance provided in NUREG 1022, Rev. 1. Although there is an apparent conflict between Action B.1 and TS 5.7.2 because Action B.1 does not require an alternate monitoring method, the Bases to Action B.1 states that alternate required actions are identified before a loss of function capability condition occurs. However, an alternate trending method was not "pre-planned" before the loss nor in place after the completion time of Action A.1 expired. Therefore, this report is also being provided in accordance with 10CFR50.73(a)(2)(i).

Because the same procedure error which resulted in not entering TS 3.3.11 Action A in 1998 also affects Unit 2, and, prior to August 1996 (implementation of TS Improvement Program), the Allowed Outage Time for TS 3.3.3.6 was 7 days, it is possible there have been other similar missed reports for both units. Therefore, a single Unit 3 report for both units is being provided in accordance with the guidance provided by NUREG 1022, Rev. 1.

## Cause of the Event:

The cause of 3TR0911X1 being declared inoperable in March 1998 was the take up spool upper retaining plate return tension spring was broken. The broken spring had the potential to affect the required trending capability of the recorder. The cause of the broken spring was not determined in March 1998, and, due to the passage of time, was not determined at this time.

A Special Report, as required by TS 3.3.11 Action B.1, was not submitted in 1998 due to a procedure error. The original surveillance procedure (circa 1982) was based on an SCE internal memorandum that identified only pressurizer and steam generator pressures and levels for trending. Consequently the surveillance procedure did not identify a requirement to trend RCS Hot Leg Temperature. Because of the passage of time, SCE did not determine the rationale for not including RCS Hot Leg Temperature for trending.

Subsequent analysis of PAMI was performed in 1993 and resulted in Regulatory Guide 1.97 Report 90065. That document listed the Hot Leg Wide Range Temperature recorder as a required instrument, but did not distinguish whether it was required for indication or trending. Therefore, no change to the PAMI surveillance procedure was made, and the procedure continued to reference the 1982 memo. Due to the passage of time, SCE did not determine why Report 90065 did not make that distinction between indication and trending.

## Corrective Actions:

- Recorder 3TR0911X1 was returned to operable on April 15, 1998.
- The procedure error was corrected on February 18, 2000.
- SCE is investigating the apparent conflict between TS 3.3.11 and TS 5.7.2, and will take the appropriate corrective actions, if any, when that investigation is complete.

## Safety Significance:

The safety significance of this event was minimal. Only the trending capability for Channel A was lost. Other instruments were operable and capable of providing RCS Hot Leg Temperature Channel A indication.

(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	2000	-- 001 --	00	4 of 4

In addition, RCS Hot Leg Temperature Channel B is available on the Critical Functions Monitoring System (CFMS) for trending. In the Reg Guide 1.97 report, SCE credited Qualified Safety Parameter Display System (QSPDS) Channel B. However, QSPDS Channel B does not have any trending or storage capability. All signals to QSPDS are routed to CFMS computer (QC III/ Seismic II) and stored in memory. CFMS provides display pages for historical trending as well as real time trending when required.

## Additional Information:

- In the past 3 years, SCE has not reported any instance of inoperable PAMI, nor identified any other instances of missed reports due to procedure errors.
- SCE is reviewing PAMI documentation to determine whether any other trending devices have been similarly omitted. As part of that investigation, SCE has determined that the Containment High Range Radiation Monitor recorders 2RR7804G1 and 2RR7804G2 are required to be operable in order to meet TS 3.3.11. On March 8, 2000, SCE verified these Unit 2 recorders had been returned to service without being connected to their input signals following modification during the last refueling outage (AR000300456) and were, therefore, inoperable. The cause of this occurrence is the same as the cause discussed above for the RCS Hot Leg Temperature recorder - SCE did not previously recognize that the trending function of these recorders is required for PAMI operability. The recorders were returned to operable on March 9, 2000. SCE also confirmed that a similar condition did not exist for the corresponding Unit 3 recorders.

After SCE's investigation is completed, this LER will be revised if any other similar reportable events are discovered.