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Nuclear Business Unit

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

LER 354/00-002-00
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NO. NPF-57
DOCKET NO. 50-354

Gentlemen:

This Licensee Event Report entitled "Technical Specification Prohibited Condition – Failure To Meet Technical Specification Surveillance Requirements To Perform Channel Check Of Main Steam Isolation Valve Sealing System Instrumentation" is being submitted pursuant to the requirements of the Code of Federal Regulations 10CFR50.73(a)(2)(i).

Sincerely,

A handwritten signature in black ink, appearing to read "M. B. Bezilla".

M. B. Bezilla
Vice-president - Operations

Attachment

/rbk

C Distribution
LER File 3.7

The power is in your hands.

Handwritten initials "IE22" in black ink.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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 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 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, the information collection.

FACILITY NAME (1)

Hope Creek Generating Station

DOCKET NUMBER (2)

05000354

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TITLE (4)

Technical Specification Prohibited Condition - Failure To Meet Technical Specification Surveillance Requirements To Perform Channel Check Of Main Steam Isolation Valve Sealing System Instrumentation

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	27	00	00	-- 002	-- 00	03	27	00		0500
									FACILITY NAME	DOCKET NUMBER
										0500

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
1	100	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)	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	TELEPHONE NUMBER (Include Area Code)
Brooke Knieriem, Licensing Engineer	(856) 339-1782

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 15 single-spaced typewritten lines) (16)

Technical Specification 4.6.1.4.d.1 requires that the operability of the Main Steam Isolation Valve Sealing System control instrumentation be verified at least once per 24 hours by performance of a CHANNEL CHECK. On February 26, 2000, the log documenting performance of this surveillance was omitted from the pre-prepared log package for that day. The error was not identified by station personnel until the required surveillance interval and the allowed grace period for the surveillance were exceeded. The apparent cause of this occurrence was personnel error in the preparation and review of the surveillance log package. Upon discovery of this condition, on February 27, 2000, the CHANNEL CHECK of the Main Steam Isolation Valve Sealing System control instrumentation was satisfactorily performed. To prevent recurrence of this event, management expectations regarding page checking of log packages by log users and reviewers were communicated to the operating crews, with emphasis on the need for attention to detail. Additionally this event will be evaluated as a part of a common cause evaluation of human performance errors.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor (BWR/4)

Main Steam Isolation Valve Sealing System {BD/-}*

* Energy Industry Identification System (EIIS) codes and component function identifier codes appear as {SS/CC}

CONDITIONS PRIOR TO OCCURRENCE

At the time of the occurrence, Hope Creek was in OPERATIONAL CONDITION 1 (Power Operation) operating at full power.

DESCRIPTION OF OCCURRENCE

On February 27, 2000, at 0936, Hope Creek personnel identified that Technical Specification surveillance 4.6.1.4.d.1 documented by Hope Creek procedure HC.OP-DL.ZZ-0026(Q), Surveillance Log, Attachment 1A, page 1, had not been performed during the previous day. Following discovery of this condition, at 0940, on February 27, 2000, the missed surveillances were satisfactorily performed.

Hope Creek procedure HC.OP-DL.ZZ-0026(Q), Surveillance Log, is used to document the verification of the operability of the MSIV Sealing Steam System {BD/-} control instrumentation by performance of a CHANNEL CHECK every 24 hours (Technical Specification 4.6.1.4.d.1). The most recent performance of this surveillance occurred at 2300 on February 25, 2000. Considering the 24-hour surveillance frequency of the MSIV Sealing Steam System CHANNEL CHECK, and the 25% grace period allowed by Technical Specification 4.0.2, this surveillance became overdue at 0500 on February 27, 2000.

For the MSIV Sealing System, no ACTION requirement exists for the inoperability of both MSIV Sealing System loops. When the 24-hour surveillance frequency and the 25% grace period were exceeded, Technical Specification 3.0.3. was entered and the missed surveillance became reportable pursuant to 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by Technical Specifications.

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APPARENT CAUSE OF OCCURRENCE

The apparent cause of this Technical Specification non-compliance was personnel error during the preparation of the daily log package, and inattention to detail during the performance and review of the daily surveillances. During the preparation of the daily log package, Attachment 1A, page 1 of procedure HC.OP-DL.ZZ-0026(Q), Surveillance Log, was omitted. This page is used to document performance of the MSIV Sealing System 24-hour CHANNEL CHECK. The omission of the log page was not identified by the log package preparer, the log users, or the log reviewers before the surveillance interval and the grace period were exceeded.

PRIOR SIMILAR OCCURRENCES

A review of LERs for Hope Creek for the past two years identified nine events involving missed Technical Specification surveillances that were attributable to personnel error. The LERs include Hope Creek LER 354/98-001-00, Hope Creek LER 354/98-002-00, Hope Creek LER 354/98-005-00, Hope Creek LER 354/98-006-00, Hope Creek LER 354/98-007-00, Hope Creek LER 354/99-002-00, Hope Creek LER 354/99-005-00, Hope Creek LER 354/99-012-00, and Hope Creek LER 354/00-001-00. Although these previous occurrences were caused by personnel error, the circumstances of these events were not similar in nature to the missed MSIV Sealing System CHANNEL CHECK and therefore the corrective actions taken for those LERs would not have prevented this event.

SAFETY CONSEQUENCES

The Main Steam Isolation Valve Sealing System limits the leakage of fission products through the Main Steam Isolation Valves following a design basis large break Loss of Coolant Accident to ensure that the resultant dose at the site boundary will be a small fraction of the 10CFR100 limits. The system consists of two independent sub-systems that are each capable of limiting leakage through the Main Steam Isolation Valves. Following the discovery of the missed surveillance, the CHANNEL CHECK of the Main Steam Isolation Valve Sealing System instrumentation was satisfactorily performed indicating that the instrumentation associated with the Main Steam Isolation Valve Sealing System remained operable throughout. Therefore, based on the above, there was no impact on the health and safety of the public.

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CORRECTIVE ACTIONS

1. Pre-prepared log packages were checked to verify completeness.
2. Management expectations regarding page checking of log packages by log users and reviewers were communicated to the operating crews, with emphasis on the need for attention to detail.
3. An evaluation of this event will be included as a part of a common cause evaluation of human performance errors. This evaluation will be completed by April 26, 2000.
4. Personnel involved were disciplined, as appropriate, in accordance with PSE&G policies.