

SEP 21 2001



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U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Gentlemen:

LER 311/2001-004-00
SALEM GENERATING STATION UNIT 2
FACILITY OPERATING LICENSE NO. DPR-70
DOCKET NO. 50-311

Gentlemen:

This Licensee Event Report entitled "Missed Technical Specification Requirement for Containment isolation Valve" is being submitted pursuant to the requirements of 10CFR50 73(a)(2)(i)(B). The attached LER contains no commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "D. F. Garchow".

D. F. Garchow
Vice President - Operations

Attachment

/KMB

C Distribution

IE22

Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.

LICENSEE EVENT REPORT (LER)

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

1. FACILITY NAME Salem Generating Station Unit 2	2. DOCKET NUMBER 05000311	3. PAGE 1 OF 4
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4. TITLE
Missed Technical Specification Requirement for Containment Isolation Valve

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
07	26	2001	2001	-004	-00	09	21	2001	FACILITY NAME	DOCKET NUMBER
										05000
										05000

9. OPERATING MODE	1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)								
10. POWER LEVEL	100	20.2201(b)			20.2203(a)(3)(ii)			50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)
		20.2201(d)			20.2203(a)(4)			50.73(a)(2)(iii)		50.73(a)(2)(x)
		20.2203(a)(1)			50.36(c)(1)(i)(A)			50.73(a)(2)(iv)(A)		73.71(a)(4)
		20.2203(a)(2)(i)			50.36(c)(1)(ii)(A)			50.73(a)(2)(v)(A)		73.71(a)(5)
		20.2203(a)(2)(ii)			50.36(c)(2)			50.73(a)(2)(v)(B)		OTHER
		20.2203(a)(2)(iii)			50.46(a)(3)(ii)			50.73(a)(2)(v)(C)		Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iv)			50.73(a)(2)(i)(A)			50.73(a)(2)(v)(D)		
		20.2203(a)(2)(v)			X 50.73(a)(2)(i)(B)			50.73(a)(2)(vii)		
20.2203(a)(2)(vi)			50.73(a)(2)(i)(C)			50.73(a)(2)(viii)(A)				
20.2203(a)(3)(i)			50.73(a)(2)(ii)(A)			50.73(a)(2)(viii)(B)				

12. LICENSEE CONTACT FOR THIS LER

NAME Kennard M. Buddenbohn, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) (856) 339 - 5653
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED				15. EXPECTED SUBMISSION DATE		
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO		MONTH	DAY	YEAR

16. ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On August 10, 2001, PSEG Nuclear identified that a failure to comply with Salem Unit 2 Technical Specification (T/S) 3.6.3, Containment Isolation Valves had occurred on July 26, 2001. T/S 3.6.3 requires that an inoperable penetration be isolated by use of at least one deactivated automatic valve. Maintenance on the 2SJ12 Boron Injection Tank Outlet Valve, a listed containment isolation valve, was conducted. Redundant automatic valves 2SJ4/5 were placed in the closed position to support the maintenance. Contrary to T/S 3.6.3, the redundant automatic valves were not deactivated. The apparent cause of the failure to comply with T/S was due to inconsistent information in the Salem UFSAR and Salem In Service Testing (IST) manual valve data sheets in that valve 2SJ12 was not clearly identified as a containment isolation valve. Corrective actions include:

- The licensing and design basis of valve 2SJ12 and other valves included in Salem USFAR Table 6.2-10 will be reviewed in order to identify similar problems.
- An analysis of previously identified T/S compliance and administration issues over the past two years at Salem will be conducted.
- A review of this event will be conducted with licensed operators.

The safety significance of this event was minimal in that the affected penetration was isolated and its safety function is to open upon a safety injection signal. This condition is being reported in accordance with the requirements of 10CFR50.73(a)(2)(i)(B) as "Any operation or condition that was prohibited by the plant's Technical Specifications..."

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FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
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		2001	- 004	- 00	

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

PLANT AND SYSTEM IDENTIFICATION

Westinghouse - Pressurized Water Reactor
High Pressure Safety Injection System / Injection valve {BQ/INV}*

* Energy Industry Identification System (EIIS) codes and component function identifier codes appear in the text as {SS/CCC}.

IDENTIFICATION OF OCCURRENCE

Event Date: July 26, 2001
Discovery Date: August 10, 2001

CONDITIONS PRIOR TO OCCURRENCE

MODE 1 (POWER OPERATION)

No structures, systems, or components were inoperable at the time of the occurrence that contributed to the event.

DESCRIPTION OF OCCURRENCE

On August 10, 2001, a failure to comply with Salem Unit 2 Technical Specification (T/S) 3.6.3, Containment Isolation Valves was identified. This condition was identified during an evaluation of circumstances surrounding the maintenance performed on Boron Injection Tank Outlet Valve S2SJ-2SJ12 (2SJ12) {BQ/INV} on July 26, 2001.

At approximately 0500 on July 26, 2001, licensed plant personnel de-energized the 2SJ12 and placed the valve on its open backseat to allow packing replacement. This rendered the motor operated valve inoperable. T/S action statement (TSAS) 3.5.2.a, Emergency Core Cooling System Subsystems, was entered with an allowed outage time of 72 hours. 2SJ12 is also a listed containment isolation valve as described in section 6.2 of the Salem UFSAR and is subject to the requirements of T/S 3.6.3. Valve 2SJ12 was not considered a containment isolation valve by licensed operators and therefore the action requirements of T/S 3.6.3 were not applied. This resulted in a condition prohibited by the plant's T/S.

The packing replacement on 2SJ12 was completed and the normal configuration of the Safety Injection System was restored. At 2111 on July 26, 2001, TSAS 3.5.2.a was exited.

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

CAUSE OF OCCURRENCE

The apparent cause of the failure to comply with T/S was due to inconsistent information in the Salem UFSAR and Salem In Service Testing (IST) manual valve data sheets in that valve 2SJ12 was not clearly identified as a containment isolation valve. An incomplete understanding of the information presented in section 6.2 of the Salem UFSAR and the Salem IST manual valve data sheets existed. Some operators did not recognize that 2SJ12 was listed as a containment isolation valve in the Salem UFSAR. Some operators did, but were convinced that T/S 3.6.3 did not apply due to conflicting statements in the Salem UFSAR and the Salem IST manual regarding the valve's safety function.

PREVIOUS OCCURRENCES

A review of events over the past two years identified no reportable events due to a failure to comply with Technical Specifications due to inconsistent licensing basis information at Hope Creek or Salem Generating Stations.

SAFETY CONSEQUENCES AND IMPLICATIONS

There were no actual safety consequences associated with this event. The safety significance of this event was minimal in that the affected penetration was isolated by closure of the Boron Injection Tank Inlet Valves S2SJ-2SJ4/5 (2SJ4/5). Also, its safety function is to open upon a safety injection signal.

Potential safety consequences of this event were mitigated because:

- a. The primary safety function of 2SJ12 is to automatically open allowing safety injection flow during a loss of reactor coolant system inventory. This function was retained with the valve de-energized and placed on its open backseat.
- b. Valve 2SJ12 is a listed containment isolation valve. This is supported by its inclusion in Table 6.2-10 of the Salem UFSAR, by the text of section 6.2 of the Salem UFSAR and the functions described in the IST program valve data sheet for 2SJ12. There are statements within all three of these references that conflict with the idea of 2SJ12 as a containment isolation valve. This function was not retained with the valve placed on its backseat. However, the position of other components mitigated potential safety consequences of a containment overpressure event if it had occurred during the 2SJ12 repair. The Boron Injection Tank to Cold Leg Check valve S2SJ-2SJ150 (2SJ150) {BQ/INV} served as a containment isolation valve inside containment. This check valve is tested during refueling outages. Outside containment, the 2SJ4/5 valves were closed prior to opening 2SJ12.

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

A review of this event determined that a Safety System Functional Failure (SSFF) as defined in Nuclear Energy Institute (NEI) 99-02, Regulatory Assessment Performance Indicator Guideline, did not occur.

CORRECTIVE ACTIONS

1. A review of the licensing and design basis of all valves included in Salem USFAR Table 6.2-10 (including 2SJ12) will be conducted. Clarifications or changes to the information presented in the table so the containment isolation function of all valves is clearly identified will be made.
2. A common cause analysis of Technical Specification and Licensing related issues (notifications) at Salem since January 1, 2000 will be conducted.
3. A review of this event will be conducted with licensed operators. The review will include a detailed discussion of the T/S 3.6.3, section 6.2.4.2 of the Salem UFSAR, and Table 6.2-10 of the Salem UFSAR.

COMMITMENTS

The corrective actions cited in this LER are voluntary enhancements and do not constitute commitments.