

JAN 27 2003

LRN-03-0033



**United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555**

**Special Report 354/03-001
Hope Creek Generating Station
Facility Operating License NPF-57
Docket No. 50-354**

This special report is being submitted pursuant to the requirements of Hope Creek Technical Specification 3.3.7.5, ACTION 81 b, due to the North Plant Vent (NPV) high range noble gas monitor being inoperable for greater than 72 hours.

On January 8, 2003 at 0401 hours, Technical Specification (TS) 3.3.7.5 "Accident Monitoring Instrumentation" Limiting Condition for Operation (LCO) and Offsite Dose Calculation Manual (ODCM) 3.3.7.11, "Radioactive Gaseous Effluent Monitoring Instrumentation" Action Statements were entered to perform scheduled maintenance and testing.

Technical Specification 3.3.7.5, Action 81 states; "With the number of OPERABLE accident monitoring instrumentation channels less than required by the Minimum Number of Channels OPERABLE requirement, either restore the inoperable channel (S) to OPERABLE status within 72 hours, or: a. Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and b. Prepare and submit a Special Report ". The requisite alternative monitoring was initiated and in place for the LCO duration.

The maintenance evolution was planned for approximately 10 hours to complete. However, a number of unexpected occurrences caused the work window to expand. Although the maintenance work on the NPV RMS was completed prior to the 72 hours, the planned testing on the NPV RMS was not completed prior to the LCO action time. The NPV RMS was returned to service January 12, 2003 at 0050, approximately 21 hours beyond the LCO action time.

IE22

JAN 27 2003

Document Control Desk

- 2 -

LRN-03-0033

The apparent cause of exceeding the LCO action time was a failure of the work management planning process and execution oversight by management to recognize the full impact of the NPV RMS work (sample pump maintenance and surveillance testing) on the 72-hour LCO work window. This resulted in scheduling the NPV RMS sample pump maintenance work early and surveillance tests over an extended period. The NPV RMS was tagged and declared INOPERABLE for maintenance on January 8, 2003 at approximately 4 a.m.

The original schedule included the NPV RMS sample pump work only. This maintenance work window was scheduled for approximately 10 hours. The remaining work (retest and surveillances) for the NPV RMS (which makes the monitor INOP when this testing is being performed) was scheduled to occur at least a day later. If the work had been laid out to include both the work and testing consecutively within the window and the allowed outage time guidance (per procedure NC.WM-AP.ZZ-0001, *Work Management Process*) for 72 hour LCO followed, the problems encountered would have been completed and the LCO exited prior to the 72 hours.

The accumulative affect of the late start and other problems was that the NPV RMS was declared OPERABLE and returned to service approximately 21 hours beyond the LCO action time (January 12, 2003 at 0050 hours).

Should there be any questions regarding this matter please contact Howard Berrick at 856-339-1862.

Sincerely,



L. Waldinger
Director - Operations

C Administrator- Region I
United States Nuclear Regulatory Commission
474 Allendale Road
King of Prussia, PA 19406

/HGB