

LR-N04-0135



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U. S. Nuclear Regulatory Commission
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Washington, DC 20555

LER 311/04-001-00
SALEM GENERATING STATION - UNIT 2
FACILITY OPERATING LICENSE NO. DPR-75
DOCKET NO. 50-311

Gentlemen:

This Licensee Event Report entitled "Failure to Take Proper Compensatory Containment Air Samples," is being submitted pursuant to the requirements of 10CFR50.73 (a)(2)(i)(B).

Sincerely,

A handwritten signature in black ink, appearing to read "C. Fricker", written over a faint, larger signature.

C. Fricker
Plant Manager - Salem

Attachment

BJT

C Distribution
 LER File 3.7

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 3
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4. TITLE
Failure to Take Proper Compensatory Containment Air Samples

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
02	12	04	04	- 001 - 00		04	07	04	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE 1	10. POWER LEVEL 100	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)			
		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 Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iii)	50.46(a)(3)(ii)	50.73(a)(2)(v)(C)	
		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 Brian J. Thomas, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) 856-339-2022
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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	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X	NO					

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

On February 4, 2004, the Containment Air Particulate Detector (APD) was declared inoperable and Technical Specification (TS) Action Statements 3.3.3.1 Action 24 and 3.4.7.1 were entered. TS 3.4.7.1 requires grab samples of the containment atmosphere at least once per 24 hours with the gaseous and/or particulate radioactivity monitoring system inoperable. On February 13, 2004, when the required compensatory samples were being collected at approximately 2155 hours, it was identified that containment isolation valve 2VC12 had been tagged closed. Valve 2VC12 was tagged closed at approximately 1130 on February 12, 2004. With this valve closed, representative samples of the containment atmosphere could not be obtained. Samples had been collected with the valve closed on February 12, 2004 at 2120 hours and February 13, 2004 at 0925 hours. The last sample collected with valve 2VC12 open was on February 12, 2004 at 0945 hours. Therefore, a period of approximately 36 hours elapsed between representative samples of the containment atmosphere being obtained contrary to TS requirements.

The cause of this event is attributed to personnel error by the Chemistry Technicians that performed the sampling activities on February 12 and 13, 2004. Chemistry personnel involved with this event have been held accountable in accordance with PSEG policies and procedural compliance was reinforced with Salem Chemistry personnel.

This report is being made in accordance with 10CFR50.73(a)(2)(i)(B).

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
SALEM UNIT 2	05000311	04	-0 0 1	-00	2 OF 3

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

PLANT AND SYSTEM IDENTIFICATION

Westinghouse – Pressurized Water Reactor

Radiation Monitoring System (IL/-)

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

CONDITIONS PRIOR TO OCCURRENCE

Salem Unit 2 was in Mode 1 at approximately 100% reactor power. No additional equipment was out of service that contributed to this event.

DESCRIPTION OF OCCURRENCE

On February 4, 2004, the Containment Air Particulate Detector (APD) {IL/DET} was declared inoperable and Technical Specification (TS) Action Statements 3.3.3.1 Action 24 and 3.4.7.1 were entered. Action 24 of TS 3.3.3.1 states to comply with the ACTION requirements of Specification 3.4.7.1. TS 3.4.7.1 Action states in part:

“...operation may continue for up to 30 days provided grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours when the required gaseous and/or particulate radioactivity monitoring system is inoperable; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours”

Chemistry procedures require samples to be collected and analyzed approximately every 12 hours to ensure the 24 hour period is not exceeded. On February 13, 2004, when the required compensatory samples were being collected at approximately 2155 hours, it was identified that containment isolation valve 2VC12 had been tagged closed. Valve 2VC12 was tagged closed at approximately 1130 on February 12, 2004. With this valve closed, representative samples of the containment atmosphere could not be obtained. Samples had been collected with the valve closed on February 12, 2004, at 2120 hours and February 13, 2004, at 0925 hours. The last sample collected with valve 2VC12 open was on February 12, 2004, at 0945 hours. Therefore, a period of approximately 36 hours elapsed between representative samples of the containment atmosphere being obtained contrary to TS requirements. This report is being made in accordance with 10CFR50.73(a)(2)(i)(B).

CAUSE OF OCCURRENCE

The cause of this event is attributed to personnel error by the Chemistry Technicians that performed the sampling activities on February 12 and 13, 2004. Chemistry procedure SC.CH-AB.CBV-0243 provides direction to the technicians on how to obtain a sample when the APD sample pump is in-service or out of service. The procedure requires the Chemistry Technicians to ask Operations to verify that valves 2VC11 and 2VC12 are open, or to open these valves. A contributing cause to this event was that procedure SC.CH-AB.ABV-0243 was characterized as a Category II procedure. Although Category II procedures with specific procedure steps are required to be performed in sequence, documentation of completion of the steps in the procedure is not required.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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		04	-0 0 1	-00	

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

PRIOR SIMILAR OCCURRENCES

A review of LERs for Salem and Hope Creek for the previous two years did not identify any previous reportable occurrences as a result of a failure to follow procedures.

SAFETY CONSEQUENCES

There were no safety consequences associated with the failure to take containment atmosphere grab samples from February 12 at 0945 to February 13 at 2155. There was no indication of any increased Reactor Coolant System leakage or containment activity based on other alternate indications. Grab samples were collected within 2 hours of discovery of the missed samples and the results of these samples indicated no changes in Containment particulate or gaseous activity levels.

A review of this event determined that a Safety System Functional Failure (SSFF) as defined in Nuclear Energy Institute (NEI) 99-02 has not occurred.

CORRECTIVE ACTIONS:

1. Chemistry personnel involved with this event have been held accountable in accordance with PSEG policies.
2. Procedural compliance was reinforced with Salem Chemistry personnel.
3. Procedure SC.CH-SA.CBV-0243 was revised to change the use category of the procedure from Category II to Category I to ensure documentation of procedure step completion prior to proceeding to the next step of the procedure.

COMMITMENTS

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