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CORRESPONDENCE CONTROL TICKET

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AUTHOR: Tom Gurdziel

AFFILIATION: NY

ADDRESSEE: A. Christopher Bakken

SUBJECT: Comments regarding Hope Creek

ACTION: Appropriate

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Chairman Nils J. Diaz,
FYI
Don Dudziak

9 Twin Orchard Drive
Oswego, NY 13126
January 6, 2005

Mr. A. Christopher Bakken III
President, Chief Nuclear Officer
PSEG Nuclear LLC
80 Park Plaza
PO Box 570
Newark, NJ 07101

Dear Mr. A. Christopher Bakken III:

I have these additional comments, also based on my reading of your Hope Creek LER 354/04-010-00.

Missing Description

From a long time ago, I seem to remember a maximum allowable BWR cooldown rate of 100 degrees F. an hour. Assuming your reactor was at about 540 degrees F. at 1814 hours on October 10, 2004 and that cold shutdown requires a temperature below 212 degrees F., (a difference of 328 degrees F.), it would seem that about 3 1/3 hours would be required. I calculate that you took 34 hours and 55 minutes.

I looked in the Description of Occurrence section to find out what took so long. I was unsuccessful. On about the middle of page 4 of 7, at "approximately 2203 hours" (on October 10th), the description ends.

Decision to Use the Condensate System

Wasn't the decision to transition to the condensate system unwise, considering that the condenser would soon be unavailable to accept reactor inventory?

Manual Control of the Turbine Bypass Valves

It doesn't specifically say this, but it seems to me that the control room operators controlled the turbine bypass valves manually (using the BOJM or Bypass Opening Jack Motor) instead of using the wide range pressure regulator. Why would this be a problem? If you call for a certain pressure with the pressure regulator, you get it automatically (assuming the equipment works), and the bypass valves close. If you use the BOJM, you need to pay attention to the reactor pressure (in a high stress control room environment) and then manually close them. Then open them. Then close them. This is wasteful of manpower and, based on my simulator experiences, probably is going to result in loss of pressure control.

(You do need to take manual control below the range of the wide range pressure regulator, but then you are only about 150 psi in the reactor vessel.)

## HPCI

When the mechanical interlock cleared by giving the injection valves a closed signal, I would have to assume that the limit switch (on HV-8278) had been, and remained loose, but now made the necessary contact. Otherwise, it still shouldn't have worked. I would guess that this is the result of too much vibration at that location. You have no corrective action associated with this possibility.

## RCIC

RCIC flow controller oscillations are, to me, unacceptable. I, therefore, do not accept the corrective action to change the simulator. I think you should fix this equipment. (For example, there was no mention of RCIC problems in the Perry scram this morning.) I think you do not have a working recirculation arrangement on your RCIC pump that would allow flow not going to the reactor to go back to the pump's water source. The desired result is that there is always 75% flow going through the pump, even if none is going to the reactor.

## Attitude Towards Safety

"Operating procedures for moisture separator level control were inadequate to prevent extended operation with no water" (on page 5 of 7) pretty much says it all. Instead of doing ONLY what the procedure allows, you have developed an attitude that you can do anything you want unless it is specifically prohibited. This is unsafe.

Yours truly,

Tom Gurdziel

Copy:

Chairman N. J. Diaz
Comm. E. McGaffigan, Jr.
Comm. J.S. Merrifield
IG H.T. Bell
D. Lochbaum