



AUG 05 2010

LR-N10-0296

10CFR50.73

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-001

Hope Creek Generating Station Unit 1
Facility Operating License No. NPF-57
Docket No. 50-354

Subject: Licensee Event Report 2010-001

In accordance with 50.73(a)(2)(i)(B), PSEG Nuclear LLC is submitting Licensee Event Report (LER) Number 2010-001.

Should you have any questions concerning this letter, please contact Mr. Timothy R. Devik at (856) 339-3108.

No regulatory commitments are contained in the LER.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Wagner".

Acting
for L. Wagner

Lawrence M. Wagner
Plant Manager
Hope Creek Generating Station

Attachment: Licensee Event Report 2010-001

JED
NRN

Page 2
LR-N10-0296
Document Control Desk

cc: Mr. M. Dapas, Acting Administrator – Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. R. Ennis, Project Manager Salem and Hope Creek
U.S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O8 B1A
11555 Rockville Pike
Rockville, MD 20852

USNRC Senior Resident Inspector – Hope Creek (X24)

P. Mulligan, Manager IV
Bureau of Nuclear Engineering
PO Box 415
Trenton, NJ 08625

Hope Creek Commitment Tracking Coordinator

(The bcc list should not be submitted as part of the DCD submittal - remove this page prior to submittal and make the bcc distribution accordingly)

President and Chief Nuclear Officer
Site Vice President - Salem
Site Vice President - Hope Creek
Vice President, Operations Support
Director - Nuclear Oversight
Director - Regulatory Affairs
Plant Manager - Salem
Plant Manager - Hope Creek
Regulatory Assurance Manager - Salem
Regulatory Assurance Manager - Hope Creek
Licensing Manager
Commitment Coordinator - Salem
Document Control

LICENSEE EVENT REPORT (LER)

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

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@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 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.

1. FACILITY NAME Hope Creek Generating Station	2. DOCKET NUMBER 05000 354.	3. PAGE 1 OF 4
--	---------------------------------------	--------------------------

4. TITLE
Technical Specification Surveillance Requirement Not Met

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
06	08	2010	2010	- 001 -	000	08	05	2010	N/A	
									FACILITY NAME	DOCKET NUMBER
									N/A	

9. OPERATING MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: <i>(Check all that apply)</i>			
10. POWER LEVEL 100	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	

Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME Timothy R. Devik, Sr. Compliance Engineer	TELEPHONE NUMBER (Include Area Code) 856-339-3108
--	--

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
D	CC	ISV	M138	N					

14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE MONTH: DAY: YEAR:
--	--

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

On June 8, 2010, during a review of Technical Specification (TS) surveillance requirement (SR) 4.7.1.1.b, it was noted that existing surveillance tests for the Safety Auxiliary Cooling System (SACS) heat exchanger (HX) bypass valves (EG-HV-2457A/B) did not appear to adequately test the isolation circuitry of the valves.

This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as a condition which was prohibited by the plant's TS in that the SR test procedures used were not adequate to fully test the SACS HX bypass valves and an adequate surveillance test has not been written and performed.

At the time, Hope Creek Generating Station (HCGS) was at 100% power. The SACS HX bypass valves were closed and declared inoperable while an engineering assessment was conducted to determine if the valves were required to be tested in accordance with the SR and/or whether the existing surveillance tests met the requirements of the SR. It has been determined that the 2457A/B should be tested under SR 4.7.1.1.b.

Surveillance tests will be performed prior to restoring the EG-HV-2457A/B to operation. An extent of condition review of other SACS valves is being performed. If additional valves are identified as not being adequately included in the SR population, a supplement to this LER will be provided. The TSs will be reviewed to determine if there are similar SRs in other systems.

NRC FORM 366A
(9-2007)

LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION
CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Hope Creek Generating Station	05000354	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		2010	- 001	- 000	

NARRATIVE

PLANT AND SYSTEM IDENTIFICATION

General Electric – Boiling Water Reactor (BWR/4)
 Safety Auxiliaries Cooling System (SACS)– EISS Identifier {CC}*
 Isolation Valve – EISS Identifier {ISV}

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

IDENTIFICATION OF OCCURRENCE

Event Date: June 8, 2010
 Discovery Date: June 8 2010

CONDITIONS PRIOR TO OCCURRENCE

Hope Creek was in Operational Condition 1 at 100% core thermal power (CTP). No other structures, systems or components contributed to the event.

DESCRIPTION OF OCCURRENCE

On June 8, 2010, a review of the TS SR 4.7.1.1.b revealed that the SACS {CC} HX bypass valves (EG-HV-2457A/B {ISV}) may not have been adequately surveillance tested in accordance with the requirements of TS SR 4.7.1.1.b. A corrective action program notification (20466109) was written to document the concern. Due to the system configuration, the valves were closed and declared inoperable while a review of design documents, procedures and historical records was performed to determine whether or not the 2457A/B met the requirement to be included in the TS SR test population.

SR 4.7.1.1.b states that verification for SACS operability must be made “..at least once per 18 months by verifying that 1) Each automatic valve servicing safety-related equipment actuates to its correct position on the appropriate test signal(s)...”. The HCGS UFSAR (section 9.2.2.2) states “In the event of excessive temperature rise, the heat exchanger bypass valves are automatically closed to provide maximum cooling”. Engineering calculations for SACS during design basis accidents assumes the bypass valves are closed to maintain SACS temperature less than 100 degrees F.

A review of plant historical data from 07/01/2007 to the present shows that the EG-HV-2457A and -2457B valves indicate closed whenever the SACS temperature in the respective loop rose to approximately 90 deg F. A sampling of the operating logs on dates that the valves indicate closed shows that the closures were automatic, and not manual, actuations. There were multiple closures each year for each valve. This provides a reasonable assurance that if the valves were called upon to respond to an accident condition, they would have fulfilled their design requirement by closing as the SACS temperature increased, and would be closed prior to SACS temperature reaching the design temperature of 100 deg. F.

The inservice test program (IST) tests the closure of the 2457A/B valves using a local control switch. The IST program testing does not test the temperature trip function of the valves.

CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Hope Creek Generating Station	05000354	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 4
		2010	- 001	- 000	

NARRATIVE

SAFETY CONSEQUENCES AND IMPLICATIONS

When the SR satisfaction was questioned for the 2457A/B valves, the valves were conservatively declared INOPERABLE and were closed, securing the HX bypass flow. Engineering and Operations personnel reviewed plant data, design basis documents, surveillance tests, inservice test procedures and other data to determine if the 2457A/B should be tested in accordance with TS SR 4.7.1.1.b and whether or not the existing testing performed on the 2457A/B and associated circuitry was adequate to meet SR 4.7.1.1.b.

During the mid to late 1990s, Hope Creek Generating Station (HCGS) conducted a Technical Specification Surveillance Improvement Program (TSSIP) as a corrective action to LER 95-017 that reviewed TS SRs against existing procedures and processes to ensure compliance with the TS SRs. LERs were generated (95-035, 95-034, 95-033 and supplements) to document areas where the SRs were not being met. Although LER 95-033-02 documented the SACS HX inlet valves as not being adequately tested for SR 4.7.1.1.b, no documentation could be located regarding the 2457A/B valves.

HCGS UFSAR section 9.2.2.2, SACS System Description, states "...the SACS loop coolant supply temperature is continuously monitored and controlled to the designed temperature range...In the event of excessive temperature rise, the heat exchanger bypass valves are automatically closed to provide maximum cooling...". Engineering calculations for the SACS during design basis accidents assumes the HX bypass line is isolated to maintain SACS temperature less than 100 degrees F.

During the review of plant data from 07/01/2007 to 07/31/2010, it was noted that the 2457A/B have automatically closed multiple times every year in response to a rising SACS temperature. The valves closed prior to SACS temperature reaching 90 deg F. The automatic closure was thus demonstrated by actual plant system response and provides a reasonable assurance of operability for these valves.

Because the plant historical data indicates the valves closed automatically when the SACS temperatures rose at least once per year from 2007 to the present, there is reasonable assurance that the HX bypass line would have been isolated upon an accident condition prior to the SACS temperatures exceeding the design bases temperature (100 deg F). Thus, the SACS systems remained operable.

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

CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Hope Creek Generating Station	05000354	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 OF 4
		2010	- 001	- 000	

NARRATIVE

CAUSE OF OCCURRENCE

The cause of this event was inadequate documentation and analysis of the surveillance procedures used to satisfy TS SR 4.7.1.1.b. The documentation and analysis occurred in the 1995 to 1997 timeframe during the TSSIP program that was instituted as a response to LER 95-017.

PREVIOUS OCCURRENCES

A review of Licensee Event Reports for the past three years at Hope Creek was performed to determine if a similar event had occurred. No similar events were noted.

CORRECTIVE ACTIONS

- (1) Surveillance test procedures will be written to adequately test the EG-HV-2457A/B valves to the standard of TS SR 4.7.1.1.b.
- (2) The surveillance will be performed for the EG-HV-2457A/B valves prior to returning the valves to service.
- (3) An extent of condition review is being performed to validate the SACS automatic valves that service safety related equipment are included and tested to TS SR 4.7.1.1.b requirements. If additional valves are discovered as requiring to be in the SR population, a supplement to this LER will be submitted.
- (4) The TSs will be reviewed to determine if there are similar SR statements in other systems that require "all automatic valves that service safety related equipment" to be tested.

COMMITMENTS

This LER contains no commitments.