

PSEG Nuclear LLC  
P.O. Box 236, Hancocks Bridge, New Jersey 08038-0236



DEC 10 2013

10CFR50.73

LR-N13-0254

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

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

Subject: Licensee Event Report 2013-004-00

In accordance with 10 CFR 50.73(a)(2)(i)(B), PSEG Nuclear LLC is submitting Licensee Event Report (LER) Number 2013-004-00, "Operations With A Potential To Drain The Reactor Vessel (OPDRV) Without Secondary Containment."

If you have any questions or require additional information, please contact Mr. Paul Bonnett at (856) 339-1923.

There are no regulatory commitments contained in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric S. Carr", with a long horizontal flourish extending to the right.

Eric S. Carr  
Plant Manager  
Hope Creek Generating Station

Attachment: Licensee Event Report 2013-004-00

DEC 10 2013

LR-N13-0254

Page 2 of 2

10CFR50.73

cc: W. Dean, Regional Administrator – Region I, NRC  
J. Hughey, Project Manager - US NRC  
NRC Senior Resident Inspector – Hope Creek (X24)  
P. Mulligan, Manager, NJBNE  
LER uploaded to ICES  
P. Bonnett - Hope Creek Commitment Tracking Coordinator (H02)  
L. Marabella - Corporate Commitment Tracking Coordinator (N21)

# 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 F53), 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.

<b>1. FACILITY NAME</b> Hope Creek Generating Station	<b>2. DOCKET NUMBER</b> 05000354	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Operations With A Potential To Drain The Reactor Vessel (OPDRV) Without Secondary Containment

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
10	15	2013	2013	- 004 -	00	12	10	2013	N/A	
									FACILITY NAME	DOCKET NUMBER
									N/A	

<b>9. OPERATING MODE</b>  5	<b>10. POWER LEVEL</b>  000	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§:</b> <i>(Check all that apply)</i>																																				
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Specify in Abstract below or in NRC Form 366A																																						

**12. LICENSEE CONTACT FOR THIS LER**

FACILITY NAME Paul Bonnett, Sr. Compliance Engineer	TELEPHONE NUMBER (Include Area Code) (856)-339-1923
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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

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

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

On October 15, October 20, and October 23, 2013, with Hope Creek Generating Station (HCGS) in a planned refueling outage and the reactor cavity flooded up in OPCON 5, HCGS performed operations with a potential to drain the reactor vessel (OPDRV) without an operable secondary containment. These operations are prohibited by Technical Specification (TS) 3.6.4.1; however, recent NRC guidance provided in Enforcement Guidance Memorandum (EGM) 11-003, Revision 1, allowed the implementation of interim actions as an alternative to full compliance. These actions were compiled in a plant procedure for the OPDRV activities performed at HCGS during Refueling Outage (H1R18) in October 2013.

These OPDRV activities were planned activities that were completed under the guidance of plant procedures and confirmed to have low safety significance based on the interim actions taken. Since these actions were deliberate, no cause determination was necessary. Consistent with the guidance provided in EGM 11-003, Revision 1, HCGS will submit a license amendment request to adopt a Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue within four months after the issuance of the Notice of Availability of the TSTF traveler.

These conditions are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by TS.

CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Hope Creek Generating Station	05000354	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		2013	- 004	- 00	

NARRATIVE

**PLANT AND SYSTEM IDENTIFICATION**

General Electric – Boiling Water Reactor (BWR/4)\*  
 Reactor Pressure Vessel (AC) – EISS Identifier {AC/RPV}  
 Secondary Containment (NG) – EISS Identifier {NG}

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

**IDENTIFICATION OF EVENT**

Event Dates: October 15, October 20, and October 23, 2013  
 Discovery Dates: October 15, October 20, and October 23, 2013

**CONDITIONS PRIOR TO EVENT**

Hope Creek was shutdown for Refueling Outage H1R18 in Operational Condition (OPCON) 5 - Refueling Operations.

**DESCRIPTION OF EVENT**

On October 15, October 20, and October 23, 2013, with Hope Creek Generating Station (HCGS) in a planned refueling outage and the reactor cavity flooded up in OPCON 5, HCGS performed operations with a potential to drain the reactor vessel (OPDRV) without an operable secondary containment {NG}. These operations are prohibited by Technical Specification (TS) 3.6.4.1, "Secondary Containment." The NRC recognized that such activities may need to be performed during refueling outages while activities were underway with the Boiling Water Reactor Owners Group (BWROG) to formulate acceptable generic changes to the BWR Technical Specifications (TS). NRC guidance provided in Enforcement Guidance Memorandum (EGM) 11-003, Revision 1, "Enforcement Guidance Memorandum on Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations With a Potential for Draining the Reactor Vessel," dated December 20, 2012, allowed the implementation of specific interim actions, as an alternative to full compliance with TS, while the improvements in the TS are under development with the BWROG. The required interim actions specified in the EGM were incorporated into plant procedure OP-HC-108-102, "Management of Operations with the Potential to Drain the Reactor Vessel." This procedure was then utilized on three occasions, listed in Table 1, during Refueling Outage (H1R18) in October.

**Table 1 – HCGS OPDRVs Performed October 2013**

Activity/Implementation Duration	Start	End
'A' Recirc Pump Seal Replacement 14 days, 18 hours, 43 minutes	October 15, 2013 at 17:00 EDT	October 30, 2013 at 11:43 EDT
CRD Mechanism and LPRM Replacement 4 days, 7 hours, 6 minutes	October 20, 2013 at 12:00 EDT	October 24, 2013 at 19:06 EDT
RWCU LLRT 24 hours, 35 minutes	October 23, 2013 at 18:29 EDT	October 24, 2013 at 19:06 EDT

These conditions are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by TS.

CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Hope Creek Generating Station	05000354	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
		2013	- 004	- 00	

**NARRATIVE**

**CAUSE OF EVENT**

Implementation of EGM 11-003, Revision 1, interim actions during the HCGS refueling outage (H1R18) was a planned activity. As such, no cause determination was performed for the event.

**SAFETY CONSEQUENCES AND IMPLICATIONS**

The OPDRVs discussed in this report were performed during the HCGS refueling outage (H1R18) and were accomplished using the interim actions provided by the NRC in EGM 11-003, Revision 1. For these events, HCGS adhered to the NRC plain language meaning of OPDRV activities that could potentially result in draining or siphoning the RPV water level below the top of fuel. This included evolutions involving aligning and realigning plant systems prior to achieving steady-state water level control, without taking credit for mitigating measures. HCGS also met the requirements that specify the minimum makeup flow rate and water inventory based on OPDRV activities with long drain down times. Further, an adequate defense in depth was maintained to minimize the potential for the release of fission products with secondary containment not operable by (a) monitoring RPV level to identify the onset of a loss of inventory event, (b) maintaining the capability to isolate the potential leakage paths, (c) prohibiting Mode 4 (cold shutdown) OPDRV activities, and (d) prohibiting movement of irradiated fuel with the spent fuel storage pool gates removed in Mode 5. All other Mode 5 TS requirements for activities were followed. Since these compensatory measures were properly implemented, an adequate level of safety was provided during the OPDRV activities described in this report. Based on this information, the performance of these OPDRV activities were determined to have a low safety significance.

**PREVIOUS EVENTS**

A review of Licensee Event Reports and the corrective action program for the past three years identified the following previous similar occurrences.

- LER 2012-003-00, dated May 5, 2012, reported an OPDRV activity during the 2012 refueling outage (H1R17). Interim actions in accordance with Revision 0 of the EGM were applied. No corrective actions were stated.

**CORRECTIVE ACTIONS**

HCGS will submit a license amendment request to adopt a Technical Specification Task Force (TSTF) traveler associated with generic resolution of this issue, within four months after the issuance of the Notice of Availability of the TSTF traveler.

**COMMITMENTS**

This LER contains no regulatory commitments.