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December 24, 2013
LR-N13-0277

10CFR50.73

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 2013-006-00

In accordance with 10 CFR 50.73(a)(2)(i)(B), PSEG Nuclear LLC is submitting Licensee Event Report (LER) Number 2013-006-00, "Operations With a Potential to Drain the Reactor Vessel (OPDRV) Without Secondary Containment Operable."

If you have any questions or require additional information, please contact Mr. Phil Duca at (856) 339-1640.

There are no regulatory commitments contained in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric S. Carr".

W.T. ROSEMILL
ACTING FOR -

Eric S. Carr
Plant Manager
Hope Creek Generating Station

Attachment: Licensee Event Report 2013-006-00

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.

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

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	31	2013	2013	- 006 -	00	12	24	2013	N/A	
									FACILITY NAME	DOCKET NUMBER
									N/A	

9. OPERATING MODE 5	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: (Check all that apply)									
10. POWER LEVEL 000	<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)(viii)(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)(viii)(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 Philip J. Duca, Sr. Compliance Engineer	TELEPHONE NUMBER (Include Area Code) (856)-339-1640
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EIPX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EIPX
				N					N

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

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

On October 31, 2013, at approximately 09:30, during a refueling outage, the Reactor Water Cleanup (RWCU) system was placed in letdown to radwaste to control reactor pressure vessel (RPV) inventory. Because the automatic isolation function was not available for either valve in the drain-down path, the guidance in Enforcement Guidance Memorandum (EGM) 11-003, Revision 1 could not be utilized. EGM 11-003, Revision 1 states: "The addition and removal of small volumes of water inventory from the RPV, for example control rod drive cooling water, is considered steady-state water level control and not an OPDRV provided the instrumentation and valves for automatic isolation of the drain-down path remain available." This placed the plant in an operation with the potential to drain the reactor vessel (OPDRV). Technical Specification 3.6.5.1 requires secondary containment to be set if the plant is in an OPDRV. Secondary containment was not set; therefore, the plant was in a condition prohibited by Technical Specifications.

The Shift Manager identified the condition at 16:31. The condition was corrected at 17:21 by placing an inoperable level channel in a tripped condition, which restored the instrumentation and valve for automatic isolation of the drain path.

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation or condition which was prohibited by the plant's Technical Specifications.

NRC FORM 366A
(10-2010)

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 3
		2013	- 006	- 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 31, 2013
 Discovery Date: October 31, 2013

CONDITIONS PRIOR TO EVENT

Hope Creek was shutdown for Refueling Outage H1R18 in Operational Condition (OPCON) 5- Refueling Operations. The reactor pressure vessel level was at the flange. The reactor cavity draining had been completed and the fuel pool gates were in place.

DESCRIPTION OF EVENT

On October 31, 2013, at approximately 09:30, Hope Creek Generating Station (HCGS) performed an operation with a potential to drain the reactor vessel (OPDRV) without having an operable secondary containment. During the refueling outage, the Reactor Water Cleanup (RWCU){CE} system was placed in letdown to radwaste to control reactor pressure vessel (RPV) inventory. Because the automatic isolation function was not available for either valve in the drain-down path, the guidance in Enforcement Guidance Memorandum (EGM) 11-003, Revision 1 could not be utilized. EGM 11-003, Revision 1 states: "The addition and removal of small volumes of water inventory from the RPV, for example control rod drive cooling water, is considered steady-state water level control and not an OPDRV provided the instrumentation and valves for automatic isolation of the drain-down path remain available." This placed the plant in an OPDRV. Technical Specification (TS) 3.6.5.1 requires secondary containment to be set if the plant is in an OPDRV. Secondary containment was not set; therefore, the plant was in a condition prohibited by Technical Specifications. In this condition, Hope Creek transitioned to OPCON *. OPCON * is described in TS 3.6.5.1 as: "When recently irradiated fuel is being handled in the secondary containment and during operations with a potential for draining the reactor vessel." RPV level was being maintained at the flange by balancing input from the control rod drive system by using reactor water cleanup (RWCU) letdown to radwaste.

The Shift Manager (SM) identified the condition at 16:31, 6.5 hours after placing RWCU in letdown to radwaste. Once recognized, the functionality of the instrumentation and valve for automatic isolation of the drain-down path was restored at 17:21.

TS 3.6.5.1 requires secondary containment to be operable during OPDRV activities in OPCON *. The Action Statement with Secondary Containment inoperable in OPCON * is to suspend operations with a potential to drain the reactor vessel. The operators did not comply with this action. During this evolution the EGM guidance was not met and secondary containment should have been set.

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation or condition which was prohibited by the plant's Technical Specifications.

CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
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NARRATIVE

CAUSE OF EVENT

The cause of the event was the failure of the operating crew to recognize that the Level 2 isolation instrumentation to support the automatic isolation of the drain path was removed from service for refueling outage maintenance. Once the OPDRV was recognized, automatic isolation capability of one of the valves in the drain path was restored.

SAFETY CONSEQUENCES AND IMPLICATIONS

The safety consequences of this occurrence are minimal. The condition existed for only a short period of time (approximately 7.5 hours). Reactor inventory was maintained at a safe level, stable at the RPV flange, throughout the time that a RWCU valve would not have isolated automatically. Level indication and alarm functions remained available and the evolution was being constantly monitored. Additionally, an isolation valve was capable of being manually closed from the control room if required.

This event was determined not to be a Safety System Functional Failure (SSFF) as defined in NEI 99-02.

PREVIOUS EVENTS

A review of events at Hope Creek for the past three years was performed to determine if a similar event had occurred. No events involving unplanned OPDRVs were identified.

CORRECTIVE ACTIONS

The condition was corrected at 17:21 by restoring the automatic isolation capability of one of the valves in the drain path.

COMMITMENTS

This LER contains no regulatory commitments.