

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



April 9, 2018

LR-N18-0034

10 CFR 50.73

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Salem Nuclear Generating Station Unit 1
Renewed Facility Operating License No. DPR-70
NRC Docket No. 50-272

SUBJECT: LER 272/2016-006-01
Technical Specification (TS) for Containment Integrity not met

Licensee Event Report, "Technical Specification (TS) for Containment Integrity not met" is submitted pursuant to 10 CFR 50.73 (a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications....."

Should you have any questions or comments regarding the submittal, please contact Mr. Harry Balian of Regulatory Affairs at (856) 339 - 2173.

There are no regulatory commitments contained in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick A. Martino".

Patrick A. Martino
Plant Manager
Salem Generating Station

Enclosure – LER 272/2016-006-01

Page 2
LR-N18-0034

cc D. Lew, Administrator – Region 1
J. Kim, Licensing Project Manager – Salem
P. Finney, USNRC Senior Resident Inspector – Salem
P. Mulligan, Manager, IV, Bureau of Nuclear Engineering
T. Cachaza, Salem Commitment Coordinator
L. Marabella, Corporate Commitment Coordinator



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@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 Salem Generating Station – Unit 1	2. Docket Number 05000272	3. Page 1 OF 3
--	-------------------------------------	--------------------------

4. Title
Technical Specification (TS) for Containment Integrity 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
12	08	2016	2016	006	01	04	09	2018		05000
									Facility Name	Docket Number
										05000

9. Operating Mode 1	11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: (Check all that apply)											
	<input type="checkbox"/> 20.2201(b)			<input type="checkbox"/> 20.2203(a)(3)(i)			<input type="checkbox"/> 50.73(a)(2)(ii)(A)			<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.2201(d)			<input type="checkbox"/> 20.2203(a)(3)(ii)			<input type="checkbox"/> 50.73(a)(2)(ii)(B)			<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
	<input type="checkbox"/> 20.2203(a)(1)			<input type="checkbox"/> 20.2203(a)(4)			<input type="checkbox"/> 50.73(a)(2)(iii)			<input type="checkbox"/> 50.73(a)(2)(ix)(A)		
10. Power Level 100	<input type="checkbox"/> 20.2203(a)(2)(i)			<input type="checkbox"/> 50.36(c)(1)(i)(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)(ii)			<input type="checkbox"/> 50.36(c)(1)(ii)(A)			<input type="checkbox"/> 50.73(a)(2)(v)(A)			<input type="checkbox"/> 73.71(a)(4)		
	<input type="checkbox"/> 20.2203(a)(2)(iii)			<input type="checkbox"/> 50.36(c)(2)			<input type="checkbox"/> 50.73(a)(2)(v)(B)			<input type="checkbox"/> 73.71(a)(5)		
	<input type="checkbox"/> 20.2203(a)(2)(iv)			<input type="checkbox"/> 50.46(a)(3)(ii)			<input type="checkbox"/> 50.73(a)(2)(v)(C)			<input type="checkbox"/> 73.77(a)(1)		
	<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)(D)			<input type="checkbox"/> 73.77(a)(2)(ii)		
	<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)(vii)			<input type="checkbox"/> 73.77(a)(2)(iii)		
			<input type="checkbox"/> 50.73(a)(2)(i)(C)			<input type="checkbox"/> Other (Specify in Abstract below or in NRC Form 366A)						

12. Licensee Contact for this LER

Licensee Contact Harry Balian, Regulatory Compliance Engineer	Telephone Number (Include Area Code) (856) 339 – 2173
--	--

13. Complete One Line for each Component Failure Described in this Report

Cause	System	Component	Manufacturer	Reportable To ICES	Cause	System	Component	Manufacturer	Reportable To ICES
A	BD								

14. Supplemental Report Expected <input checked="" type="checkbox"/> Yes (If yes, complete 15. Expected Submission Date) <input type="checkbox"/> No	15. Expected Submission Date	Month 12	Day 31	Year 2018
--	-------------------------------------	-------------	-----------	--------------

Abstract (Limit to 1400 spaces, i.e., approximately 14 single-spaced typewritten lines)

On December 8, 2016 the Containment (CTMT) Air Particulate Detector (APD), Normal Containment Isolation Valves (CIV) were closed to support a planned maintenance activity and the Back Up (B/U) manual isolation valves were opened under administrative controls to support continued operation of the APD. The normal isolation valves and the backup isolation valves were restored to their normal positions on December 29, 2016. The B/U isolation valves were open for 21 days rather than the originally reported 27 days.

On November 14, 2017 NRC Integrated Inspection Report 05000272/2017003 was issued documenting a Green Non-Cited Violation (NCV) of Technical Specification (TS) Limiting Condition for Operation (LCO) 3.6.1.1, Containment Integrity. The report states that having the B/U manual CIV's open for 27 days constituted a violation of TS LCO 3.6.1.1, Containment Integrity, in that the valves were not operated in an intermittent manner as specified by the TS.

This supplement provides information not available when the original LER was submitted.



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

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@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	2. DOCKET NUMBER	3. LER NUMBER		
Salem Generating Station – Unit 1	05000-272	YEAR 2016	SEQUENTIAL NUMBER - 006	REV NO. - 001

NARRATIVE

PLANT AND SYSTEM IDENTIFICATION

Westinghouse-Pressurized Water Reactor {PWR/4}
Containment Leakage Control System {BD}

IDENTIFICATION OF OCCURRENCE

Discovery Date: 11/14/2017
Event Date: 12/08/2016

CONDITIONS PRIOR TO OCCURRENCE

Salem Unit 1 was in Mode 1, 100 percent rated thermal power (RTP).

DESCRIPTION OF OCCURRENCE

On December 8, 2016 the Containment (CTMT) Air Particulate Detector (APD), Normal Containment Isolation Valves (CIV) were closed to support a planned maintenance activity and the Back Up (B/U) manual isolation valves were opened under administrative controls to support continued operation of the APD. On December 29, 2016 a Temporary Lift to the Work Clearance Document was performed that restored power back to the Normal Containment Isolation Valves (CIV). Once power was restored, the CIVs were surveilled satisfactorily and the B/U isolation valves were closed. The B/U isolation valves were open for 21 days. On January 4, 2017 a full release of the Work Clearance Document was performed. The 27 days addressed in the NCV takes into account the start date of the work window (December 8, 2016) until the Work Clearance Document was fully released (January 4, 2017).

CAUSE OF EVENT

An evaluation of the event determined that human performance error allowed the Back Up manual isolation valves to remain open for 21 days. Specifically, the direct cause was failure to adequately assess and manage risk associated with the work activity per WC-AA-105, Work Activity Risk Management. This activity was inappropriately coded low risk instead of high risk due to the human performance error.

PSEG Nuclear requested reconsideration of the NCV associated with this event by letter LR-N17-0188 (ML17319A152). The NRC acknowledged this request by letter EA-17-98 dated January 9, 2018 (ML18009A953). A supplemental LER will be submitted when that review is complete.



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

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOF-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	2. DOCKET NUMBER	3. LER NUMBER		
Salem Generating Station – Unit 1	05000-272	YEAR 2016	SEQUENTIAL NUMBER - 006	REV NO. - 001

NARRATIVE

SAFETY CONSEQUENCES AND IMPLICATIONS

There were no safety consequences as a result of this event. The alignment supported full operability of the APD. Prior to the start of the work window administrative controls were established to ensure containment isolation {BD} could be performed by manual actions if required by the applicable Emergency Operating Procedure (EOP).

SAFETY SYSTEM FUNCTIONAL FAILURE

A review of this event determined that a safety system functional failure (SSFF) as defined in NEI 99-02, Regulatory Assessment Performance Indicators Guidelines, did not occur. This event did not prevent the ability of a system to fulfill its safety function to either shutdown the reactor, remove residual heat, control the release of radioactive material, or mitigate the consequences of an accident.

PREVIOUS EVENTS

A review of Salem licensee event reports for the previous three years identified one similar LER. LER 272/2017-001-000 reported Containment Integrity Inoperable for Longer than Allowed by Technical Specifications caused by human performance error because Operators did not implement LCO tracking as required by OP-SA-108-115-1001. The corrective actions taken were specific to that event and would not have prevented this event.

CORRECTIVE ACTIONS

This was a human performance error for which performance management actions will be taken to correct the behavior. The performance management actions include reinforcement of standards and expectations with the individuals involved, departmental rollouts with the applicable departments involved and some procedure enhancements.

COMMITMENTS

There are no regulatory commitments in this LER.