



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038-0236

**Nuclear Business Unit**

**JUL 23 1997**

LR-N970456

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

LER 311/97-007-00  
SALEM GENERATING STATION - UNIT 2  
FACILITY OPERATING LICENSE NO. DPR-75  
DOCKET NO. 50-311

This Licensee Event Report entitled "Missed 4.0.5 Testing of  
Check Valves 2CC195 and 2CC210," is being submitted pursuant to  
the requirements of the Code of Federal Regulations  
10CFR50.73(a)(2)(i)(B).

Sincerely,

David F. Garchow  
General Manager -  
Salem Operations

Attachment

BJT

C Distribution  
LER File 3.7

9707300043 970723  
PDR ADOCK 05000311  
S PDR



The power is in your hands.

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1/1

**LICENSEE EVENT REPORT (LER)**

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

<b>FACILITY NAME (1)</b> SALEM GENERATING STATION UNIT 2	<b>DOCKET NUMBER (2)</b> 05000311	<b>PAGE (3)</b> 1 OF 4
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**TITLE (4)**  
Missed 4.0.5 Testing of Check Valves 2CC195 and 2CC210

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
06	23	97	97	- 007	- 00	07	23	97	FACILITY NAME	DOCKET NUMBER

<b>OPERATING MODE (9)</b> 4	<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)</b>	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)
<b>POWER LEVEL (10)</b> 000		<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)
		<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71
		<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> OTHER
		<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
		<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)	
<b>NAME</b> Brian J. Thomas, Licensing Engineer	<b>TELEPHONE NUMBER (Include Area Code)</b> 609-339-2022

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

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

**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)**

On June 23, 1997, the Technical Specification (TS) 4.0.5 Inservice Inspection (ISI) requirement to perform radiography of check valves 2CC195 and 2CC210 every 92 days was determined to have been missed. As a result of the missed surveillance, one loop of the component cooling water was declared inoperable until the surveillance testing (radiography) was completed. Since the missed surveillance test exceeded the surveillance test interval, the 25% extension allowed by TS 4.0.2, and the Limiting Condition for Operation (LCO) statement time, this event is reportable in accordance with 10CFR50.73(a)(2)(i)(B) as, "any condition prohibited by the plant's Technical Specifications."

The cause of this occurrence is attributed to personnel error. The recurring task for performing the next 92 day surveillance was not generated prior to the expiration of the surveillance test interval. The check valves were subsequently tested and determined to be in their proper position. The personnel involved in this event have received appropriate disciplinary actions.

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

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
SALEM GENERATING STATION UNIT 2	05000311	97	007	00	2 OF 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

PLANT AND SYSTEM IDENTIFICATION

Westinghouse - Pressurized Water Reactor

Component Cooling Water System {CB/-}\*

\* Energy Industry Identification System (EIIS) codes and component function identifier codes appear as {SS/CCC} in the text.

CONDITIONS PRIOR TO OCCURRENCE

The plant was in Mode 4 prior to the event.

DESCRIPTION OF OCCURRENCE

On June 23, 1997, the Technical Specification (TS) 4.0.5 Inservice Inspection (ISI) requirement to perform radiography of check valves 2CC195 and 2CC210 every 92 days was determined to have been missed. The 92 day surveillance plus the 25% surveillance extension provided by TS 4.0.2 was due on June 15, 1997. Upon identification of the overdue surveillance for the 2CC195 and 2CC210 valves, the check valves were radiographed on June 23, 1997, and were determined to be in their proper position (closed). As a result of the missed surveillance, one loop of the component cooling water was declared inoperable until the surveillance testing (radiography) was completed. Since the missed surveillance test exceeded the surveillance test interval, the 25% extension allowed by TS 4.0.2, and the Limiting Condition for Operation (LCO) statement time, this event is reportable in accordance with 10CFR50.73(a)(2)(i)(B) as, "any condition prohibited by the plant's Technical Specifications."

ANALYSIS OF OCCURRENCE

In February of 1997, the Inservice Testing (IST) group identified that check valves 1(2)CC195 and 1(2)CC210 for the component cooling system were required to be tested in the reverse direction for ASME Class 3 boundary isolation on a 92 day frequency. As a result of the identification of the requirement to test check valves CC195 and CC210 in the closed position, valves 2CC195 and 2CC210 were radiographed on February 21, 1997 to verify that they were fully closed and fulfilling their function as the ASME Class 3 boundary. Completion of the radiography on February 21 then started the 92 day surveillance interval for the next surveillance test. The past reportability for failure to perform surveillance testing of the CC195 and CC210 valves prior to February of 1997 will be addressed in Supplemental LER 272/97-001-01.

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

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

ANALYSIS OF OCCURRENCE (cont'd)

As a result of the identification of the need to perform surveillance testing of check valves CC195 and CC210, a Business Process Action Request (BPAR) was generated by the ISI group, on April 2, 1997, to request that surveillance test recurring tasks (RT) for valves 2CC195 and 2CC210 be generated to test these check valves on a 92 day frequency. The valves were then added to the ISI procedure for radiography on April 4, 1997. Although the request for generation of the surveillance test RTs was generated in April, the request was not received by the Technical Specification Administrator, who is responsible for implementing changes to the surveillance testing RT, until May 6. The surveillance test recurring task request generated by the ISI group did not identify when the previous surveillance test was performed or when the next surveillance test was required to be performed in accordance with the administrative procedure. Although the date for required completion of the next surveillance test was not specified in the description of the BPAR, the Technical Specification Administrator, by coincidence, assigned a completion date for creation of the new surveillance testing RT of June 15, 1997 (this date corresponds to the 92 day surveillance interval plus the 25% extension allowed by TS 4.0.2). However, the task for completion of the new surveillance testing RT was extended by the Technical Specification Administrator to June 27, 1997, without the recognition that the surveillance test would go overdue. Upon generation of the request for creation of the new surveillance test RT, the ISI group also did not verify that the recurring task would be issued prior to the due date of the next required surveillance test.

Upon identification that the 4.0.5 surveillance testing for 2CC195 and 2CC210 was overdue, the check valves were radiographed on June 23, 1997 and the new surveillance testing RT was generated on June 25, 1997.

CAUSE OF OCCURRENCE

The cause of this occurrence is attributed to personnel error. The ISI group did not verify that the new surveillance testing RT would be generated prior to the due date of the next surveillance test. Also, the Technical Specification Administrator extended the task for generation of the new surveillance testing RT without recognizing that the next surveillance test would go overdue.

PRIOR SIMILAR OCCURRENCES

A review of LERs for Salem Units 1 and 2 submitted in the past two years did not identify any additional reportable occurrences as a result of the failure to generate a recurring task for creation of surveillance testing work orders. Although numerous LERs have been written in the past two years for missed surveillance testing, these incidents have been attributed to a lack of adequate controls on the development and maintenance of Technical Specification surveillance procedures.

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

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		97	- 007	- 00		

**TEXT (If more space is required, use additional copies of NRC Form 366A) (17)**

**SAFETY SIGNIFICANCE**

The testing of check valves 2CC195 and 2CC210 on June 23, 1997, demonstrated that the check valves were closed and provided the proper ASME Code boundary. Therefore there was no impact to the health and safety of the public.

**CORRECTIVE ACTIONS**

1. Check valves 2CC195 and 2CC210 were radiographed on June 23, 1997 and determined to be in their proper position (closed position).
2. The recurring task for generation of the next surveillance tests for 2CC195 and 2CC210 on a 92 day frequency was issued on June 25, 1997.
3. A review of outstanding surveillance testing recurring task change requests was performed to determine if any further surveillance testing was overdue. The review identified that no other surveillance testing was overdue.
4. A review of the administrative controls for creation and revision to surveillance testing recurring tasks is being performed to determine if further enhancements to the administrative controls are required. This review will be completed by October 31, 1997.
5. A Station Key Message will be distributed to NBU department personnel, reemphasizing the information required by NC.NA-AP.ZZ-0012, "Technical Specifications Surveillance Program," for generation of surveillance testing recurring task changes. This Key Message will be distributed by July 28, 1997.
6. Appropriate disciplinary actions were taken in accordance with PSE&G's policies for the Technical Specification Administrator.
7. Appropriate disciplinary actions were taken in accordance with PSE&G'S policies for the ISI personnel involved in this event.