



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038  
Hope Creek Generating Station

May 16, 1990

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

Dear Sir:

HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354  
UNIT NO. 1  
LICENSEE EVENT REPORT 90-005-00

This Licensee Event Report is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i).

Sincerely,

J.J. Hagan  
General Manager -  
Hope Creek Operations

RBC/

Attachment  
SORC Mtg. 90-046

C Distribution

9005230270 900516  
PDR ADOCK 05000354  
S FDC

The Energy People

*TE 22*  
*11*

LICENSEE EVENT REPORT

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
HOPE CREEK GENERATING STATION	0   5   0   0   0   3   5   4	1   OF   4

TITLE (4): TECHNICAL SPECIFICATION VIOLATION - LIQUID RADWASTE MONITOR INOPERABILITY NOT REPORTED IN SEMI-ANNUAL EFFLUENT MONITORING REPORT AS REQUIRED BY TECHNICAL SPECIFICATIONS - PROCEDURAL DEFICIENCY

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)					
MONTH	DAY	YEAR	YEAR	** NUMBER **	REV	MONTH	DAY	YEAR	FACILITY NAME(S)	DOCKET NUMBER(S)				
0	4	1990	9	0	05	0	0	5	1	6	9	0		

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR: (CHECK ONE OR MORE BELOW) (11)																				
POWER LEVEL	1   0   0	20.402(b)	20.405(a)(1)(i)	20.405(a)(1)(ii)	20.405(a)(1)(iii)	20.405(a)(1)(iv)	20.405(a)(1)(v)	20.405(c)	50.36(c)(1)	50.36(c)(2)	50.73(a)(2)(i)	50.73(a)(2)(ii)	50.73(a)(2)(iii)	50.73(a)(2)(iv)	50.73(a)(2)(v)	50.73(a)(2)(vii)	50.73(a)(2)(viii)(A)	50.73(a)(2)(viii)(B)	50.73(a)(2)(x)	73.71(b)	73.71(c)	OTHER (Specify in Abstract below and in Text)

LICENSEE CONTACT FOR THIS LER (12)

NAME	Richard Cowles, Senior Staff Engineer - Technical	TELEPHONE NUMBER	6   0   9   3   3   9   3   4   3   1
------	---	------------------	---------------------------------------

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE NOTED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS?	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS?

SUPPLEMENTAL REPORT EXPECTED? (14)	YES	NO	DATE EXPECTED (15)	MONTH	DAY	YEAR
		XX				

ABSTRACT (16)

On April 19, 1990, the station Radiation Protection/Chemistry Department Manager determined that an inoperability of a Liquid Radwaste Discharge Monitor (LRDM) had not been reported in the most recent Radioactive Effluent Release Report (RERR-8, dated 3/1/90) as required by Technical Specifications. The LRDM had been declared inoperable on 9/17/89 due to high background readings, however, was still functionally in service. Decontamination of the LRDM was attempted at this time, but was unsuccessful. A remote chemical decontamination apparatus was designed and constructed to decontaminate the LRDM. On 10/19/89, or 32 days after declaring the LRDM inoperable, the LRDM was decontaminated and was declared operable at this time. Technical Specifications require that any inoperability of a radioactive liquid effluent monitor for greater than 30 days duration be reported in the next semiannual RERR.

The omission of the LRDM inoperability from RERR-8 occurred due a procedural deficiency in monitoring the operability of the LRDM. Corrective actions consisted of submitting a revision to RERR-8 to document the inoperability of the LRDM, and modifying the methods utilized to track and review LRDM operability for future RERR purposes.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)						
		YEAR	**	NUMBER			**	REV						
HOPE CREEK GENERATING STATION	05000354	90	-	0	0	5	-	0	0	0	2	OF	0	4

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor (BWR/4)  
Liquid Radwaste Monitoring (EIIS Designation: IL)

IDENTIFICATION OF OCCURRENCE

Technical Specification Violation - Liquid Radwaste Monitor Inoperability Not Reported In Semi-annual Effluent Monitoring Report As Required By Technical Specifications - Procedural Deficiency

Event Date: 04/19/90

Event Time: 1355

This LER was initiated by Incident Report No. 90-042

CONDITIONS PRIOR TO OCCURRENCE

Plant in OPERATIONAL CONDITION 1 (Power Operation), Reactor Power 100%, Unit Load 1112 MWe.

DESCRIPTION OF OCCURRENCE

On 4/19/90, the station Radiation Protection/Chemistry Department Manager discovered that an inoperability of the Liquid Radwaste Discharge Monitor (LRDM) had not been reported in the most recent Radioactive Effluent Release Report (RERR-8, dated 3/1/90) as required by Technical Specifications. After consultation with the PSE&G Radiation Protection/Chemistry Services Department, a decision was made to initiate an internal incident report to document the finding, as this omission potentially constituted a violation of Technical Specifications.

After consultation with the Licensing Department, NRC Region I personnel, and the station NRC Resident Inspector, on 5/7/90 it was determined that this occurrence constituted a Technical Specification violation, and a 24 hour telephone report was made to the NRC per License Condition 2C.

APPARENT CAUSE OF OCCURRENCE

Administrative procedure deficiency / inadequacy. The method used to research LRDM operability for RERR purposes was inadequate, and did not reveal the inoperability of the LRDM when RERR-8 was being prepared.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)						
		YEAR	\\	NUMBER			\\	REV						
HOPE CREEK GENERATING STATION	05000354	90	-	0	0	5	-	0	0	0	3	OF	0	4

ANALYSIS OF OCCURRENCE

On the morning of 9/17/89, the LRDM had been declared inoperable due to high background readings. At this time, Technical Specification Action Statement 3.3.7.10.b was entered, which states:

" With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3.7.10-1. Exert best efforts to return the instruments to an OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.7 why this inoperability was not corrected in a timely manner. "

All ACTIONS in Table 3.3.7.10-1 were complied with. At the time the LRDM was declared inoperable, an unsuccessful attempt was made to decontaminate the device. As such, it was necessary to design and construct a remote chemical decontamination apparatus to decon the LRDM. On 10/19/89, or 32 days after declaring the LRDM inoperable, the apparatus was used to decontaminate the LRDM. The LRDM was declared operable at this time. Technical Specifications require that any inoperability of a radioactive liquid effluent monitor for greater than 30 days duration be reported in the next semiannual RERR.

The omission of the LRDM inoperability from RERR-8 occurred due to a procedural deficiency in the methods used by the Radiation Protection Department to track LRDM operability. In researching operability of all radiation monitors for RERR purposes, the Radiation Protection Department reviewed VAX-750 computer historical data. Each radiation monitor at Hope Creek continuously communicates with the VAX-750, which in turn, tracks the operability of the monitors and determines validity of the data received. As long as a monitor is functionally operable, the VAX-750 records the monitor as being inservice and operable. When reviewing VAX-750 data for RERR-8, the LRDM was not flagged because it had never been functionally removed from service. However, as previously noted, the LRDM was not administratively declared operable until 32 days later.

PREVIOUS OCCURRENCES

This is the first instance of an inoperable radioactive liquid effluent monitor not being reported in an RERR as required by the subject Technical Specification.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)						
		YEAR	NUMBER			REV								
HOPE CREEK GENERATING STATION	05000354	90	-	0	0	5	-	0	0	0	4	OF	0	4

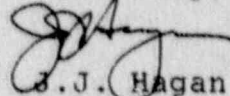
SAFETY SIGNIFICANCE

This occurrence had no potential impact on environmental protection or health and safety of the general public. As previously noted, the LRDM was functionally operable, and during the 32 day period of administrative inoperability, two independent samples were analyzed, per Technical Specifications, prior to each liquid release.

CORRECTIVE ACTIONS

1. A revision to RERR-8 was submitted detailing the inoperability of the LRDM per Technical Specification 3.3.7.10.b.
2. To prevent omitting monitor inoperabilities in future RERRs, the Radiation Protection Department will manually track LRDM inoperability by a procedural log with notification to the Radiation Protection Engineer when the LRDM inoperability duration exceeds 30 days, rather than relying on automatic updating of the computer files.

Sincerely,



J.J. Hagan  
General Manager -  
Hope Creek Operations

RBC/

SORC Mtg. 90-046