



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

Salem Generating Station

June 16, 1982

Mr. R. C. Haynes
Regional Administrator
USNRC
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Haynes:

LICENSE NO. DPR-75
DOCKET NO. 50-311
REPORTABLE OCCURRENCE 82-043/03L

Pursuant to the requirements of Salem Generating Station Unit No. 2, Technical Specifications, Section 6.9.1.9.b, we are submitting Licensee Event Report for Reportable Occurrence 82-043/03L. This report is required within thirty (30) days of the occurrence.

Sincerely yours,

A handwritten signature in cursive script that reads "H. J. Midura".

H. J. Midura
General Manager -
Salem Operations

RF:ks

CC: Distribution

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PDR ADOCK 05000311
S PDR

The Energy People

IE 22

Report Number: 82-043/03L
Report Date: 06-16-82
Occurrence Date: 05-24-82
Facility: Salem Generating Station, Unit 2
Public Service Electric & Gas Company
Hancocks Bridge, New Jersey 08038

IDENTIFICATION OF OCCURRENCE:

Primary Containment - Missed Surveillance.

This report was initiated by Incident Report 82-139.

CONDITIONS PRIOR TO OCCURRENCE:

Mode 1 - Rx Power 100% - Unit Load 1130 MWe.

DESCRIPTION OF OCCURRENCE:

At 1700 hours, May 24, 1982, during the performance of Surveillance Procedure SP(O)4.6.1.1A1, the Shift Technical Advisor discovered several valves which appeared to be missing from the procedure. The valves were determined to be of a type required to be tested in accordance with Technical Specification Surveillance Requirement 4.6.1.1. A rapid survey of piping systems penetrating the containment boundary, showed a total of 16 valves not covered by Surveillance Procedures SP(O)4.6.1.1A1 and 2. The valves were immediately checked; all were found to be in the closed position, and they were locked and tagged as found. A review of valve lineups in the appropriate operating instructions showed the valves were required to be closed in the modes for which the surveillances were applicable.

DESIGNATION OF APPARENT CAUSE OF OCCURRENCE:

The valves were apparently omitted from the surveillances due to oversight at the time the procedures were written. The fact that the valves were missing subsequently escaped the attention of individuals performing the tests.

ANALYSIS OF OCCURRENCE:

Surveillance Requirement 4.6.1.1.a requires:

In order to demonstrate primary containment integrity, at least once per 31 days all penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions shall be verified, closed by valves, blind flanges, or de-activated automatic valves secured in their positions.

ANALYSIS OF OCCURRENCE: (continued)

Vents, drains, test connections, etc. which are: 1) one inch nominal pipe diameter or less, 2) located inside containment, and 3) locked, sealed, or otherwise secured in the closed position, shall be verified closed at least once per 92 days.

The valves were typically isolation valves, in 3/4 inch vents and drains from sections of piping immediately adjacent to containment penetrations, and included Valves 2SJ330, 2SJ331, 2SJ332, 2SJ333, 2SJ338, 2SJ339, 2SJ340, 2SJ341, 2SJ344, 2SJ345, 2RH58, 2RH72, 2HY923, 2HY927, 2SJ368 and 2SJ369.

The omission of the valves from the surveillances resulted in entering Technical Specification Action Statement 3.6.1.1, due to failure to satisfactorily demonstrate containment integrity. As such, the occurrence involved events leading to operation in a degraded mode permitted by a limiting condition for operation, and is reportable in accordance with Technical Specification 6.9.1.9.b. Because the valves had never been included in the surveillance, the time of entry into Action Statement 3.6.1.1 dates back to initial plant operation.

Containment integrity was maintained, however, as shown by the as found valve positions, and results of the study of the operating instructions. Penetrations of the type involved are capped, providing a boundary in addition to the closed valves. Finally, no leakage from the systems involved was observed, substantiating the conclusion that no degradation of the containment boundary occurred. Consequently, the occurrence in no way involved a risk to the health or safety of the general public.

Action Statement 3.6.1.1 requires:

Without primary containment integrity, restore integrity within one hour, or be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

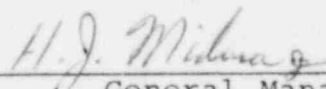
CORRECTIVE ACTION:

As demonstrated, the primary containment integrity was maintained, in compliance with Action Statement 3.6.1.1. On-the-spot changes have been incorporated into Surveillance Procedures SP(O)4.6.1.1A1 and 2, to include the missing valves. An in-depth investigation of piping systems for additional valves missing from the surveillances is presently being conducted. A Supplemental Report will be submitted upon final correction of the problem.

FAILURE DATA:

Not Applicable

Prepared By R. Frahm


General Manager -
Salem Operations

SORC Meeting No. 82-59