



PSEG

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

Salem Generating Station

November 10, 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 82-127/03L

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 82-127/03L. This report is required within thirty (30) days of the occurrence.

Sincerely yours,

H. J. Midura
General Manager -
Salem Operations

RF:ks *JSA*

CC: Distribution

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PDR ADOCK 05000311
S PDR

Report Number: 82-127/03L

Report Date: 11-10-82

Occurrence Date: 10-20-82

Facility: Salem Generating Station, Unit 2
Public Service Electric & Gas Company
Hancocks Bridge, New Jersey 08038

IDENTIFICATION OF OCCURRENCE:

Missed Surveillances - Reactor Coolant System Water Inventory.

This report was initiated by Incident Reports 82-376 and 82-399.

CONDITIONS PRIOR TO OCCURRENCE:

Mode 1 - Rx Power 80% - Unit Load 880 MWe.

DESCRIPTION OF OCCURRENCE:

At 0000 hours, October 20, 1982, during routine operation, the Control Room Operator observed that Surveillance Procedure SP(O)4.4.7.2.d, Reactor Coolant System (RCS) Water Inventory, had not been performed within the time interval required by the Technical Specifications. The previous RCS water inventory had been performed at 0410 hours, October 16, 1982; at 2210 hours, October 19, 1982, the 72 hour surveillance interval plus 25% allowance elapsed, and Action Statement 3.4.7.2.a applied.

An RCS inventory was immediately commenced; surveillance of the containment sump pump and containment radioactivity monitor demonstrated RCS leakage was within limits. Before the RCS inventory could be completed, a small forced load reduction occurred. The load reduction was due to a decrease in condenser vacuum resulting from a loss of power to the house heating boiler. Due to the load change, steady state RCS conditions could not be maintained. These conditions are required for satisfactory performance of the surveillance procedure. The surveillance was subsequently performed when conditions stabilized, and the RCS leak rate was determined to be satisfactory. At 0753 hours, October 20, 1982, Action Statement 3.4.7.2.a was terminated.

At 0446 hours, October 26, 1982, the Control Room Operator noted that 72 hours had elapsed since the previous performance of the RCS inventory. The surveillance could not be performed at that time, however, due to a load reduction resulting from planned maintenance on the circulators. Further investigation revealed that the RCS inventory was, in fact, overdue.

DESCRIPTION OF OCCURRENCE: (continued)

Technical Specification 4.0.2.b requires that the combined time for any 3 consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The inventory had been performed, as noted, at 0410 hours, October 16, 1982; the third consecutive surveillance was, therefore, due at 2210 hours, October 25, 1982, not on the following day as assumed. Since the surveillance requirements were not met, Action Statement 3.4.7.2.a came into effect. The leak rate was again verified to be in specification using the containment sump and radioactivity monitor systems.

When operating conditions stabilized, the RCS inventory was performed. With satisfactory completion of the test, at 1152 hours, October 26, 1982, compliance with Limiting Condition for Operation 3.4.7.2 was regained.

DESIGNATION OF APPARENT CAUSE OF OCCURRENCE:

In both instances, timely performance of the test was inadvertently overlooked. The situation was aggravated by the failure of the surveillance requirement to make allowance for routine, unavoidable transients which preclude performance of the surveillance.

ANALYSIS OF OCCURRENCE:

The reactor coolant leakage detection systems are provided to monitor and detect leakage from the Reactor Coolant Pressure Boundary. The boundary is one of several design features (others include the fuel cladding and primary containment) which prevent the release of radioactive fission products to the environment in the event of core damage. As noted, RCS leakage was demonstrated to be within limits, indicating the integrity of the pressure boundary was maintained. Furthermore, no degradation of redundant design features occurred. Therefore, no risk to the health or safety of the public was involved. The occurrence constituted 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.

Action Statement 3.4.7.2. requires:

With any pressure boundary leakage, be in at least hot standby within 6 hours and in cold shutdown within the following 30 hours. With any RCS leakage greater than Technical Specification limits, isolate or reduce the leakage within limits within 4 hours, or be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

CORRECTIVE ACTION:

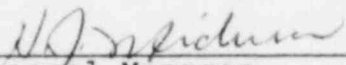
As noted, in both cases, RCS leakage was within specification, in compliance with the action statement. Operating conditions stabilized and the RCS water inventory was immediately performed. License Change Request 82-14 has been submitted to eliminate the Technical Specification inventory requirement during non-steady state operation.

Operations personnel involved in the incidents were counseled concerning the Technical Specification surveillance requirements. Finally, to insure completion within the surveillance interval, performance of the RCS water inventory was scheduled on a regular basis.

FAILURE DATA:

Not Applicable.

Prepared By R. Frahm



General Manager -
Salem Operations

SORC Meeting No. 82-101