



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

Nuclear Business Unit

SEP 01 1995

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 NO. 95-003-01

This Licensee Event Report entitled "Failure to Perform Surveillance in OPERATIONAL CONDITION Specified in Technical Specifications" is being submitted pursuant to the requirements of the Code of Federal Regulations 10CFR50.73(a) (2) (i) (B).

Sincerely,

Mark E. Reddemann
General Manager
Hope Creek Operations

DVH:jmt
SORC Mtg. 95-084

C Distribution
LER File

080017

The power is in your hands

9509110006 950902
PDR ADOCK 05000354
S PDR

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.

FACILITY NAME (1)

HOPE CREEK GENERATING STATION

DOCKET NUMBER (2)

05000354

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TITLE (4)

FAILURE TO PERFORM SURVEILLANCE IN OPERATIONAL CONDITION SPECIFIED IN TECHNICAL SPECIFICATIONS.

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
08	03	95	95	003	01	09	02	95		05000
										05000

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

OPERATING MODE (9)	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)	20.2203(a)(1)	20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)
	20.2203(a)(2)(i)	20.2203(a)(3)(ii)		50.73(a)(2)(iii)	73.71
	20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)	OTHER
	20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
	20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Mr. H. Hanson

TELEPHONE NUMBER (Include Area Code)

609-339-3005

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)

<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
			11	30	95

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

On 8/03/95 it was determined that on four occasions during the period 1987 through 1994 surveillance procedure HC.OP-ST.BH-0004(Q), Standby Liquid Control Storage Tank Heater Operability Test - 18 Months, was performed in an OPERATIONAL CONDITION different than specified in the Technical Specifications SURVEILLANCE REQUIREMENT. The Technical Specifications state this surveillance be performed "during shutdown" whereas the procedure specified that the surveillance could be performed while the plant is in any condition. On 8/03/95 with the plant at full power, this surveillance was again scheduled to be performed. However, the NSS, while reviewing the work package found the discrepancy and delayed performance of the surveillance.

The original LER (LER 95-003-00) reported a similar incident where a surveillance was performed in the wrong OPERATIONAL CONDITION. Corrective actions for the original LER indicated that similar non-compliance items will be provided in a supplement, hence the reason for this supplement.

This event is reportable in accordance with 10 CFR 73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

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

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor (BWR/4)

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

Standby Liquid Control (SLC) Tank Heater {BR/EHTR}

IDENTIFICATION OF OCCURRENCE

Hope Creek Technical Specification SURVEILLANCE REQUIREMENT 4.1.5.d.3 is specified to be performed at least once every 18 months during shutdown. On four separate occasions during the period 1987 through 1994, this surveillance was performed while the plant was at power and did not satisfy the Technical Specifications SURVEILLANCE REQUIREMENT.

Discovery Date: 8/03/95

Event Dates: 12/21/87, 06/18/89, 06/12/92 and 01/30/94.

CONDITIONS PRIOR TO OCCURRENCE

Plant in OPERATIONAL CONDITION 1 (Power Operation)
Reactor Power 100% of rated, 1109 MWe

DESCRIPTION OF OCCURRENCE

On 8/03/95 surveillance procedure HC.OP-ST.BH-04, Standby Liquid Control Storage Tank Heater Operability Test - 18 Months, was scheduled to be performed during the night shift. Prior to issuing the work package the NSS observed that the Technical Specifications require this surveillance to be performed "during shutdown". The procedure specified the surveillance requirement can be performed during any condition. This surveillance was not performed as the plant was at full power. After review, it was determined that on four previous occasions this surveillance was performed with the plant at power and did not satisfy the Technical Specifications SURVEILLANCE REQUIREMENT 4.1.5.d.3. This is reportable in accordance with 10 CFR 73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

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

ANALYSIS OF OCCURRENCE

LER 95-003-00 reported a similar incident where a surveillance was performed in the wrong OPERATIONAL CONDITION. One of the corrective actions in the LER stated the surveillance test procedures will be reviewed against the Technical Specification surveillance requirements with regard to operational condition and frequency. A review limited to Technical Specifications Section 3.8 for onsite and offsite electrical distribution surveillances was performed. However, a broader review of all surveillance procedures has not yet been completed. The NSS's heightened sensitivity of this issue is the reason this problem was identified. Without this sensitivity, this surveillance could potentially have been performed in an OPERATIONAL CONDITION which would not satisfy the Technical Specifications SURVEILLANCE REQUIREMENT.

APPARENT CAUSE OF OCCURRENCE

The root cause of this surveillance being performed in an OPERATIONAL CONDITION which would not satisfy the Technical Specifications SURVEILLANCE REQUIREMENT is an inadequate test procedure. The test procedure specifies every 18 months compared to the Technical Specification SURVEILLANCE REQUIREMENT of at least once per 18 months during shutdown. The inadequacy resulted from personnel involved in the preparation and reviews of the procedure not exhibiting attention to detail.

SAFETY SIGNIFICANCE

This occurrence had no safety significance.

Performance of this surveillance consists of manually raising the SLC Tank bulk heater thermostat 10 degrees Fahrenheit and verifying the indicated bulk temperature rises by 10 degrees. This change in temperature does not affect the ability of the SLC System to deliver the required solution to meet the design function for shutdown reactivity. Therefore, the SLC System remains operable.

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

PREVIOUS OCCURRENCES

LER 95-003-00 identified a surveillance test for the diesel generator fuel oil transfer system being performed in the wrong OPERATIONAL CONDITION. No other previous reportable occurrences of testing being performed in an OPERATIONAL CONDITION that would not satisfy the Technical Specifications surveillance requirement were identified. However, in the past several months other surveillance problems have been identified in LER 95-017-00, Inadequate Testing of Emergency Bus Undervoltage Logic Circuitry - Missed Surveillance Test, Diesel Generators Inoperable, and NRC Inspection Report 354/95-10 Violation B, Missed surveillance TIP explosive isolation valves.

CORRECTIVE ACTIONS

Procedure HC.OP-ST.BH-004 will be revised to state the proper operating condition.

The recurring task number 100069 for this surveillance has been revised to reflect scheduling once per 18 months during shutdown.

The Operations Department has reviewed all operations 18 month surveillance procedures against the Technical Specifications for compliance with all OPERATIONAL CONDITION limitations. This review identified one additional surveillance performed in an OPERATIONAL CONDITION other than stated in the Technical Specifications. The Reactor Core Isolation Cooling (RCIC) System manual initiation - pushbutton surveillance was performed in OPERATIONAL CONDITION 2 whereas the Technical Specifications require this to be performed "during shutdown." This occurrence had no safety significance and will be reported in a future LER as noted below. The procedure for the RCIC manual initiation pushbutton test will be revised prior to its next usage.

The operations surveillance recurring tasks have also been re-verified.

As a result of the surveillance problems identified in LER 95-003-00, LER 95-017-00, and NRC Inspection Report 354/95-10, an extensive surveillance procedure review is about to commence and will include the plant OPERATIONAL CONDITION applicability issue. Reportable incidents with low or no safety significance found as a result of this review, along with the RCIC problem identified above, will be documented in periodic supplements to this LER. Incidents of higher safety significance will be evaluated on an individual basis and may be reported apart from the above.

Removal of the OPERATIONAL CONDITION restraint for this surveillance from the Technical Specifications will be evaluated and if appropriate, addressed in a License Change Request.