PSE&G

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

Nuclear Business Unit

DEC 11 1995

LR-N95225

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. 95-032-00

This Licensee Event Report entitled ''Technical Specification Violation - Failure To Complete Flood Protection Actions Within Required Timeframe'' is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

Sincerely,

Mark E. Reddemann
General Manager -
Hope Creek Operations

JPP
SORC Mtg. 95-117

C Distribution
LER File

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NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98

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.

LICENSEE EVENT REPORT (LER)

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

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TITLE (4)

Technical Specification Violation - Failure To Complete Flood Protection Actions Within Required Timeframe

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
										05000
11	14	95	95	-- 032 --	00	12	11	95	FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)					
POWER LEVEL (10)	0	20.2201(b)	20.2203(a)(2)(v)	X	50.73(a)(2)(i)(B)		50.73(a)(2)(viii)
		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	TELEPHONE NUMBER (Include Area Code)
L. Wagner, Assistant Maintenance Manager - Mechanical	(609) 339-3671

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
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

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

On November 14, 1995, the Hope Creek Generating Station was in Operational Condition 4, Cold Shutdown, for a refueling outage. At 1400 hours, the Delaware River water level reached 95 feet (6.0 feet above Mean Sea Level). At this river water level, plant procedures and Technical Specification Action Statement 3.7.3.a.1 require that the service water intake structure watertight perimeter flood doors be closed within one hour. By 1500 hours, all of these watertight doors were closed with the exception of watertight door #2, which would not close due to a seal mechanism failure. At 1530 hours, operators were able to shut watertight door #2 in accordance with the Technical Specification Action Statement. The watertight door had been in a degraded, but operable status since December, 1994. Corrective actions to resolve the watertight door problems were delayed due to resolution of obsolete parts issues. The apparent cause of the event was attributed to inadequate management priority placed on the resolution of the watertight door problems. Corrective actions include the repair of the watertight door and revision to the Work Control Process administrative procedure priority scheme.

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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)

Station Service Water System - EIIS Identifier {BI}

IDENTIFICATION OF OCCURRENCE

Event date: November 14, 1995
Discovery date: November 14, 1995
Date determined to be reportable: November 14, 1995

This is reportable under 10 CFR 50.73 (a)(2)(i)(B).

CONDITIONS PRIOR TO OCCURRENCE

Plant in OPERATIONAL CONDITION 4 (Cold Shutdown)
Reactor Power 0% of rated power, 0 MWe, (Sixth Refueling Outage)

There were no structures, components or systems that were inoperable at the start of the event that contributed to the event.

DESCRIPTION OF OCCURRENCE

On November 14, 1995, the Hope Creek Generating Station was in Operational Condition 4, Cold Shutdown, for a refueling outage. At 1400 hours, the Delaware River water level reached 95 feet (6.0 feet above Mean Sea Level). At this river water level, plant abnormal operating procedure HC.OP-AB.ZZ-0139, Acts of Nature, and Technical Specification Action Statement 3.7.3.a.1, require that the service water intake structure watertight perimeter flood doors identified in Technical Specification Table 3.7.3-1 be closed within one hour. By 1500 hours, all of these watertight doors were closed with the exception of watertight door #2, which would not close due to a seal mechanism failure. At 1530 hours, operators were able to shut watertight door #2 in accordance with the Technical Specification Action Statement. At 1625 hours, the river water level dropped below 95 feet as the tide went out. Technical Specification Action Statement 3.7.3.a.1 was exited at 0430 hours on November 15, 1995, after allowing one tide cycle to be completed with river water level below 95 feet.

Since the required actions of Technical Specification 3.7.3 could not be satisfied within the required timeframe, the provisions of Technical Specification 3.0.2 were violated. Operation under these conditions is reportable under the provisions of 10CFR50.73(a)(2)(i)(B).

ANALYSIS OF OCCURRENCE

The Station Service Water System (SSWS) provides river water to cool the Safety Auxiliary Cooling System heat exchangers and the Reactor Auxiliary Cooling System heat exchangers during normal operating conditions. The SSWS is designed to operate during normal plant operation and during a design basis accident including a LOCA, loss of offsite power, and LOCA with loss of offsite power conditions. The design of the SSWS intake structure, including the watertight doors, is such that the worst case water levels will not exceed the height of the reinforced concrete wall interior to the air intake screen, thereby precluding entry into critical dry areas of the SSWS intake structure.

The problems experienced in meeting the Technical Specification time requirements on November 11, 1995, were due to the failure of watertight door #2 to operate properly. When the operators applied air to the door, the seals inflated before the door was in the closed position due to a sticky roller operated valve. The center panel of the door had to be removed and the switch for the valve needed to be cycled to allow the seals to deflate and the door to close. The failure of a thumbscrew on the inside of the door, used to deflate the seal, further challenged the operators.

Problems with the SSWS watertight door were originally identified in December, 1994. Work orders generated to fix these problems were placed on hold due to the resolution of obsolete parts issues. However, these issues were not resolved for eight months due to a lack of appropriate prioritization of this issue. In August, 1995, the watertight doors were being shut, as a precautionary measure, due to a hurricane watch. At that time, operators experienced the same problems as on November 14, 1995, but were able to close the watertight doors with assistance from maintenance personnel. Work was performed on the watertight doors (cleaning of the roller operated valves), but could not completely resolve the problems due to the aforementioned obsolete parts restraints. A quarterly preventative maintenance activity of cycling the doors was established to allow for earlier identification of problems. The commitment to resolve the watertight door problems was acknowledged in the December 1994, work order once the obsolete parts issue was resolved.

APPARENT CAUSE OF OCCURRENCE

The root cause of this event is attributed to low management priority placed on resolving the watertight door problems properly. The cause of this occurrence is similar to that documented in LER 95-028-00, dated November 29, 1995, for the resolution of Radioactive Liquid Effluent Monitoring Instrumentation.

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

SAFETY SIGNIFICANCE

Watertight door #2 is outside of an empty SSWS bay originally designed for Hope Creek Unit 2. Another watertight door in this room, protecting the SSWS traveling screens, was shut. Therefore, there was no safety significance of the failure to close watertight door #2 within the required timeframe.

PREVIOUS OCCURRENCES

There have no previous occurrences documented for failure to comply with the Flood Protection Technical Specification requirements.

CORRECTIVE ACTIONS

The obsolete parts hold on the December 1994, work order has been resolved. The work order will be completed by December 31, 1995, resolving the watertight door closure problems.

Abnormal operating procedure HC.OP-AB.ZZ-0139, Acts of Nature, will be revised to require watertight door closure when the river water level exceeds 94 feet. This will ameliorate the time pressures experienced in meeting the Technical Specification Action Statement in possibly severe weather conditions. The procedure will be revised by March 31, 1996.

As stated in LER 95-028-00, the Work Control Process administrative procedure priority scheme will be revised via the new Work Control Handbook to emphasize high priority for work orders associated with Technical Specification Action Statements. This will include the integration of obsolete spare parts issues into the Hope Creek work management plan, such that Technical Specification related equipment having parts issues will receive increased management attention. The change to the work control process will be completed prior to the completion of the current refueling outage.