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Nuclear Business Unit

JAN 04 1996

LR-N95257

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. 95-003-02

This Licensee Event Report entitled "Condition Prohibited by Technical Specifications - Non-compliance with the Frequency/condition Requirements of Technical Specifications" is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B). This LER is being supplemented to provide information concerning the improper performance of a Reactor Core Isolation Cooling System surveillance test.

Sincerely,

Mark E. Reddemann
General Manager -
Hope Creek Operations

JPP
SORC Mtg. 96-001

C Distribution
LER File

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PDR ADQCK 05000354
S PDR

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The power is in your hands.

JE22/1

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TITLE (4)
Condition Prohibited by Technical Specifications - Non-compliance with the Frequency/condition Requirements of 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
2	17	95	95	003	02	1	5	96		05000
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
1	100	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 368A			
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)				

LICENSEE CONTACT FOR THIS LER (12)

NAME: G. Daves TELEPHONE NUMBER (include Area Code): (609) 339-3071

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

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

EXPECTED SUBMISSION DATE (15)

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

The initial version of this LER (95-003-00) reported that a Surveillance Test (ST) for the transfer of fuel to the diesel generator fuel oil day tanks was performed every 18 months during operation. Technical Specifications (TS) require that this surveillance test be performed every 18 months during shutdown. Supplement 1 of this LER (95-003-01) reported that a ST procedure for the Standby Liquid Control storage tank heater operability test had previously been performed during power operation contrary to the performance during shutdown requirement. In that LER it was also identified that the ST for the Reactor Core Isolation Cooling (RCIC) System manual initiation switches was performed in Operational Condition 2 whereas the TS requires testing "at least once per 18 months during shutdown". This supplement (95-003-02) provides the details of that event. The occurrences were caused by inadequate test procedures resulting from insufficient attention to detail by the preparers and reviewers. Corrective actions included a comprehensive ST procedure review, a recurring task work order review and ST procedure revisions.

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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)

Emergency Diesel Generator Fuel Oil Transfer System - EIIS Identifier {DE}

Standby Liquid Control System - EIIS Identifier {BR}

Reactor Core Isolation Cooling System - EIIS Identifier {BN}

IDENTIFICATION OF OCCURRENCE

Event dates: 10/27/87, 3/7/89, 11/19/89, 3/17/92, 4/27/94, 8/3/95 and 8/18/95

Discovery dates: 2/17/95, 8/3/95 and 8/18/95

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

CONDITIONS PRIOR TO OCCURRENCE

Plant in OPERATIONAL CONDITION 1 (Power Operation)

Reactor Power 100% of rated power, 1109 MWe.

DESCRIPTION OF OCCURRENCE

This supplement includes additional information on the RCIC surveillance test for the manual initiation switch and is a total rewrite. The rewrite is necessary to clearly convey the events and progression of the corrective actions and supplements to LER 95-003-00.

On February 17, 1995, a surveillance test (ST) was performed to ensure operability of the emergency diesel generator (EDG) fuel oil transfer system. The ST demonstrates the capability to transfer fuel oil from each of the eight EDG fuel oil storage tanks to each of the four EDG fuel oil day tanks. While reviewing the Technical Specifications (TS) it was determined that the test is required to be performed on an 18 month frequency during shutdown conditions. A review of the previous performances of this test revealed that this test had always been performed every 18 months during power operation. This condition was reported in the initial version of this LER (95-003-00). The corrective actions included a revision to the ST procedure, updating the scheduling work order computer database, performance of a ST procedure review against the TS surveillance requirements with regard to operational condition and frequency, and a verification of consistent frequency coding in the work order system.

On August 3, 1995, an ST for the "Standby Liquid Control (SLC) Storage Tank Heater Operability Test - 18 Months" was scheduled to be performed. Prior to

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DESCRIPTION OF OCCURRENCE (Continued)

issuing the work package the Nuclear Shift Supervisor (NSS) observed that the TS required 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 versus in a shutdown condition. Therefore, the test did not satisfy TS 4.1.5.d.3. This condition was reported in supplement 1 to this LER (95-003-01). The corrective actions included revising the ST procedure, updating the scheduling work order computer database, and committing to additional supplements to report findings resulting from the review.

The Operations department concluded their review of Surveillance Tests and recurring work orders performed every 18 months prior to the issuance of LER 95-003-01. That supplement identified one additional ST performed in Operational Condition 2 whereas the TS require it to be performed "during shutdown." The ST involved the Reactor Core Isolation Cooling (RCIC) System manual initiation. LER 95-003-01 committed to reporting that finding in the next supplement.

The RCIC test procedure, HC.OP-ST.BD-0003, presently contains two sections. The first section performs the 18 month logic functional which consists of manually initiating the system from the control room. This portion of the test has been performed in Operational Condition 2 with steam pressure of approximately 150 psi, rather than during shutdown as required. The next section of this procedure performs the low steam supply pressure flow test which must be performed at approximately 150 + 15, - 0 psig in accordance with Surveillance Requirement 4.7.4.c.2.

Failure to perform the RCIC System manual initiation surveillance during shutdown is reportable in accordance with 10 CFR 73(a)(2)(i)(B), as any operation or condition prohibited by the plant's Technical Specifications.

APPARENT CAUSE OF OCCURRENCE

The cause of these surveillances being performed in an Operational Condition which would not satisfy the Technical Specifications surveillance requirements is attributed to inadequate test procedures. These inadequate procedures resulted from personnel not exhibiting attention to detail in the procedure preparation and review process.

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SAFETY SIGNIFICANCE

There was no safety significance associated with the improper ST for the fuel oil transfer pumps. Redundant fuel oil transfer pumps were available on each EDG. The EDGs would have responded to an accident signal. Operators were in the vicinity of the components and in constant communication with the control room. System alignments could have been altered as necessary well within the approximately three and a half day supply of oil in the storage tank to make the other three and a half day supply available.

Performance of the SLC surveillance consists of manually raising the SLC Tank bulk heater thermostat 10 degrees Fahrenheit and verifying that 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 safety function for the system. Therefore, the SLC system remained operable. This occurrence had no safety significance.

There is no safety significance relative to performing the RCIC functional test in Operational Condition 2. The performance of the RCIC functional test requires isolating the steam lines, which renders RCIC inoperable. This inoperability would be bounded by the RCIC TS Allowed Outage Time. The test strokes the system discharge valve exposing the discharge piping to feedwater pressure, of approximately 600 pounds, from an inservice secondary condensate pump. This piping is qualified for the normal RCIC discharge pressure of approximately 1150 pounds. This valve is also stroked as part of a quarterly IST test while at power at pressures of approximately 1000 pounds.

PREVIOUS OCCURRENCES

Failure to properly implement Technical Specification surveillance requirements has recently been documented in LERs 95-017-00, 95-033-00, 95-034-00 and 95-035-00. LER 95-017-00 documented an event where the emergency bus undervoltage logic circuitry was improperly tested, LER 95-033-00, documented the failure to perform undervoltage relay surveillances adequately, LER 95-034-00 documented a failure to perform Rod Sequence Control System surveillances when required and LER 95-035-00 documented the failure to perform Reactor Mode Switch, Source Range Monitor and Suppression Chamber Level surveillances properly. Similar to this LER, these LERs stated that the events were caused by inadequate procedures. However, the dates of occurrence and implementation of corrective actions for these LERs were after the dates of occurrence for the events described in this LER.

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CORRECTIVE ACTIONS

Procedures and the recurring task scheduling for the EDG fuel oil transfer system have been revised to state the proper Operational Condition.

The procedure for the SLC storage tank heater operability test has been revised to state the proper Operational Condition for performance of the surveillance test and the recurring task scheduling has been revised.

The procedure and the recurring task for the RCIC manual initiation pushbutton test will be revised to reflect the proper Operational Condition. These revisions will be completed prior the next performance of this RCIC surveillance test.

The Operations Department has reviewed all operations 18 month surveillance procedures against the Technical Specifications for compliance with all Operational Condition limitations. No additional deficiencies were found. The operations surveillance recurring tasks have also been re-verified.

As a result of the surveillance implementation problems identified recent LERs, a comprehensive TS surveillance improvement program has been initiated. The charter of this program is to compare the Technical Specification requirements of section 4.0 (with the exception of section 4.0.5 requirements) to the surveillance procedures to ensure that all requirements are met. This review is scheduled to be completed by 12/31/96.