

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

Nuclear Business Unit

MAR 1 3 1996

LR-N96068

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. 96-003-00

This Licensee Event Report entitled "Condition Prohibited By Technical Specifications - Failure To Perform Reactor Core Isolation Cooling (RCIC) System Surveillances" is being submitted

pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

Sincerely,

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Mark E. Reddemann General Manager -Hope Creek Operations

JPP SORC Mtg. 96-032

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Distribution LER File

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The power is in your hands.

95-2168 REV. 6/94

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

On February 14, 1996, during a review of RCIC surveillance test procedures, Operations Department personnel confirmed that several RCIC valves were not being appropriately tested in accordance with Technical Specification surveillance requirements. RCIC Technical Specification 4.7.4.c.1 states that, "The RCIC system shall be demonstrated OPERABLE at least once per 18 months by performing a system functional test which includes simulated automatic actuation and restart (automatic restart on a low reactor water level signal which is subsequent to a high reactor water level trip) and verifying that each automatic valve in the flow path actuates to its correct position." However, several valves were not tested to demonstrate automatic actuation on a RCIC initiation signal. The cause of the missed surveillance tests for the RCIC valves is attributed to inadequate review and approval of procedures intended to satisfy Hope Creek's Technical Specifications during the near-term operating license stage in the 1980s. Corrective actions include surveillance procedure revisions and testing of the subject valves. The Technical Specification Surveillance Improvement Project will continue to review surveillance procedures to ensure adequate implementation of Technical Specification requirements.

NRC FORM 366 (4-95)

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PLANT AND SYSTEM IDENTIFICATION									
General Electric - Boiling Wate	r Reactor (BWR/4)								
Reactor Core Isolation Cooling	System (RCIC) - EJ	IS	Iden	tif	ie	r {BN	1}		
IDENTIFICATION OF OCCURRENCE									
Discovery date: Date determined to be reportabl	2/8/96 e: 2/14/96								
Problem Report 960208208									
CONDITIONS PRIOR TO OCCURRENCE									
Plant in OPERATIONAL CONDITION	5 (REFUELING)								
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On February 14, 1996, during a Operations Department personnel being appropriately tested in a surveillance requirements. RCI that, "The RCIC system shall be	confirmed that se ccordance with Tec C Technical Specif	vera hnio ica	al R cal tion	CIC Spe 4.	cit 7.4	alves ficat 4.c.1	ior st	ere r 1 tates	not

that, "The RCIC system shall be demonstrated OPERABLE at least once per 18 months by performing a system functional test which includes simulated automatic actuation and restart (automatic restart on a low reactor water level signal which is subsequent to a high reactor water level trip) and verifying that each automatic valve in the flow path (suction from the suppression pool and transferring the water to the reactor pressure vessel) actuates to its correct position."

Contrary to the above requirements, Operations Department personnel concluded the following: 1) the RCIC pump discharge valve (1BD-F012) has not been verified to automatically open on a RCIC initiation signal; and 2) the valve enabling RCIC test return flow to the Condensate Storage Table (CST) has not been verified to close on a RCIC initiation signal. Since Hope Creek was in an Operational Condition where RCIC was not required to be operable, tracking LCO R6-3800 was entered to ensure that the valves are properly tested in accordance with the Technical Specification requirements. In addition, Operations Department personnel also determined that the CST suction valve (1BD-F010) has not been tested to verify that the valve automatically opens on a RCIC initiation signal as described in the UFSAR.

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			YEAR	SEQUENTIAL NUMBER	REVISION			
Hope Creek Generating Station		05000354		003	00	3	OF	4

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

## ANALYSIS OF OCCURRENCE

Failure of the surveillance test procedures to require verification of the automatic alignment of the RCIC valves has existed since initial plant startup. RCIC is designed to ensure adequate core cooling following a reactor mainsteam isolation and subsequent loss of feedwater flow. RCIC is used to control reactor pressure, temperature and water level. The RCIC pump normally draws water from the CST and discharges to one of the feedwater lines. A full flow test line (back to the CST) is provided on the RCIC pump discharge line to allow testing of the system during normal plant operations without injecting water into the reactor vessel.

Surveillance test procedures have not required verification of the automatic actuation capability of the subject RCIC valves. Failure to perform these surveillances by the frequency specified in the Technical Specifications requires actions to be taken to enter at least Hot Shutdown within 12 hours after the allowed outage time expires. Since these actions were not taken, a condition prohibited by Technical Specifications occurred, which is reportable under the provisions 50.73(a)(2)(i)(B).

# APPARENT CAUSE OF OCCURRENCE

The apparent cause of the missed surveillance tests for the RCIC valves is attributed to inadequate review and approval of procedures intended to satisfy Hope Creek's Technical Specifications during the near-term operating license stage in the 1980s.

#### ASSESSMENT OF SAFETY CONSEQUENCES

The normal positions of the subject RCIC valves enable RCIC to function upon an initiation signal without these valves changing position. The position of these valves is verified twice daily. The subject RCIC valves are also periodically exercised to ensure valve operability. In addition, the High Pressure Coolant Injection system is capable of fulfilling the RCIC functions in the event that one of the valves was in an off-normal position and did not realign upon a RCIC initiation signal.

Surveillance testing satisfying the requirements or Technical Specification 4.7.4.c.1 was completed and demonstrated the capability of the subject valves to automatically actuate on a RCIC initiation signal. Since the operability of the RCIC system was not affected with the subject valves in an off-normal alignment, there were ro adverse safety consequences associated with this event.

NRC FORM 366A (4-95)			U.S	. NUCLEAR RE	EGULATO	RYC	OMMISS	ION
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FACILITY NAME (1)		DOCKET NUMBER (2)	LER NUMBER (6) PAGE (3)					
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

## PREVIOUS OCCURRENCES

Failure to follow Technical Specification surveillance requirements has been documented in LERS 95-003-00 and supplements, 95-017-00, 95-033-00 and its supplements, 95-034-00 and 95-035-00. LER 95-03-00 documented an event where operators performed a surveillance in an operational condition other than that specified by the Technical Specifications, LER 95-017-00 documented an event where the emergency bus undervoltage logic circuitry was improperly tested, LER 95-033-00 and its supplements documented surveillance requirement implementation deficiencies identified by the Technical Specification Surveillance Improvement Project (TSSIP), 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.

In response to LER 95-017-00, the General Manager - Hope Creek Operations chartered the TSSIP to investigate, define, and resolve weaknesses in the Technical Specification Surveillance Program. The RCIC surveillance procedure deficiencies were identified by the Operations Department personnel prior to the TSSIP review of these surveillances.

# CORRECTIVE ACTIONS

The RCIC surveillance test procedures were revised to appropriately test the subject valves and ensure operability of RCIC.

The subject RCIC valves were properly tested and the requirements of Technical Specification 4.7.4.c.1 were satisfied.

The TSSIP will continue to review surveillance procedures to ensure adequate implementation of Technical Specification requirements. The TSSIP will be completed by December 31, 1996.