

Public Service
Electric and Gas
Company

Stanley LaBruna

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1200

Vice President - Nuclear Operations

JUL 17 1992

NLR-N92097

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

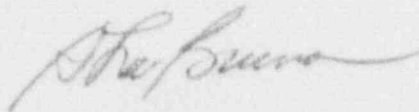
Gentlemen:

REPLY TO NOTICE OF VIOLATION AND NOTICE OF DEVIATION
INSPECTION REPORT NO. 50-354/92-03
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) is in receipt of your letter, dated June 10, 1992, which transmitted a Notice of Violation and a Notice of Deviation resulting from a surveillance test inspection that had been conducted from April 6 through 21, 1992. This letter was received by PSE&G on June 18, 1992.

Pursuant to the provisions of 10 CFR 2.201, our response to these notices is provided in Attachment 1.

Sincerely,



Affidavit
Attachment

9207240001 920717
PDR ADOCK 05000354
G PDR

JED 1/1

JUL 17 1992

C Mr. T. T. Martin, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. J. Stone, Licensing Project Manager (Acting)
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Ms. A. Keller
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. T. P. Johnson (S05)
USNRC Senior Resident Inspector


Mr. K. Tosch, Chief
NJ Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

Ref: NLR-N92097

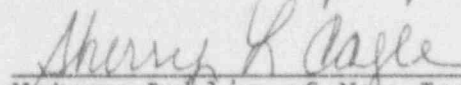
STATE OF NEW JERSEY)
)
COUNTY OF SALEM) SS.

S. LaBruna, being duly sworn according to law deposes and says:

I am Vice President - Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth on our letter dated JUL 17 1992, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 17th day of July, 1992



Notary Public of New Jersey SHERRY L. CAGLE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 5, 1997

My Commission expires on _____

ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION AND NOTICE OF DEVIATION
INSPECTION REPORT NO. 50-354/92-03
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354

I. INTRODUCTION

A team of three UENRC Region-I inspectors conducted a "Surveillance Test" inspection during the period of April 6 through April 16. The purpose of the inspection was to determine the adequacy of surveillance tests for selected safety systems and to assess the extent to which periodic testing assures that the safety functions of the systems would be fulfilled under design conditions. The systems selected for review were the High Pressure Coolant Injection System, the Filtration, Recirculation and Ventilation System, and the Low pressure Coolant Injection mode of the Residual Heat Removal System. This was a pilot type of inspection which had been performed at only two other facilities, both of which were PWRs.

As a result of this inspection, the following Notice of Violation and Notice of Deviation were issued.

II. REPLY TO NOTICE OF VIOLATION

A. Description of Violation

"10 CFR 50 Appendix B, Criterion XI requires, in part, that all testing required to demonstrate that systems will perform satisfactorily in service will be identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, the design safety function of the Filtration, Recirculation, and Ventilation System Auto-Lead/Auto-Start circuitry to detect a failure of the lead ventilation unit to start and automatically start the standby ventilation unit, together with its associated two minute time delay, is not periodically tested to assure the availability and proper operation of the FRVS during design basis conditions."

B. Reason for Violation

PSE&G has determined that the automatic process feature associated with the standby FRVS Ventilation unit should have been included in the surveillance test program but was left out as a result of an apparent oversight.

C. Corrective Steps Taken

1. Subsequent to last conversations between PSE&G and the inspection team members, further procedure reviews were conducted to determine whether the subject testing was encompassed by other than FRVS procedures. As a result of this review it was discovered that procedure HC.OP-ST.KJ-0006(Q), "Integrated Emergency Diesel Generator 1BG400 Test - 18 Months", required the B FRVS Ventilation Unit (BV-206) to be tested in both AUTO and AUTO LEAD modes, although the two minute timer is not tested. A review of HC.OP-ST.KJ-0005(Q), the equivalent procedure for the A FRVS Ventilation Unit indicated that the A unit is only tested in the AUTO LEAD mode.

Based on the preceding findings, the A ventilation unit has been placed in AUTO LEAD and the B unit has been placed in AUTO. The units will remain in this configuration until the AUTO function of the A unit has been tested.

HC.OP-ST.KJ-0005(Q) will be revised to test the AUTO and the AUTO LEAD modes of the A FRVS Ventilation Unit (AV-206) prior to its next scheduled performance during the fourth refueling outage scheduled to start in September, 1992.

2. A procedure revision request has been initiated for HC.OP-ST.SM-0002(Q), "PCIS/Reactor Building Refuel Floor Containment Isolation Functional Test - 18 Months". The revision will require the A and B ventilation units to be tested in AUTO mode and the associated time delays to be verified.

This procedure will be revised prior to its next scheduled performance during the fourth refueling outage scheduled to start in September, 1992.

D. Corrective Steps to Avoid Further Violations

1. A review of plant systems will be conducted to determine whether there are any other functions that should be tested. The objective of this review will be to identify other system transfer functions, not currently tested, whose failure would result in a total loss of system safety function.

This review will be completed prior to startup from the fourth refueling outage scheduled to start in September, 1992.

2. The AUTO and AUTO LEAD functions, along with the AUTO time delays, will be functionally tested on an 18 month interval, starting at the fourth refueling outage scheduled to start in September, 1992.

E. Date When Full Compliance will be Achieved

As detailed above, PSE&G will be in full compliance with this issue prior to startup from the fourth refueling outage scheduled to start in September, 1992.

III. REPLY TO NOTICE OF DEVIATION

A. Description of Deviation

"Updated Final Safety Analysis Report Table 6.3-2 states that the maximum opening time of Low Pressure Coolant Injection system injection valves is 24 seconds to assure adequate system flow during Loss-of-coolant accident (LOCA) conditions.

Contrary to the above, surveillance test procedures HC.OP-ST.BC-0004(5)(6)(7), "LPCI Subsystem ECCS Time Response Functional Test", incorrectly permitted the maximum opening time of the injection valves to be 27 seconds."

PSE&G notes that the above statement is incorrect in that the referenced procedures specify a maximum opening time of 40 seconds. HC.OP-IS.BC-0105(Q) is the procedure which contained the 27 second maximum opening time requirement.

B. Reason for Deviation

PSE&G believes that the reason for this deviation was a past interpretation of UFSAR Section 5.4.7.1.1.2 which states, in part:

"The pumps attain rated speed in 27 seconds and the injection valves will be fully open in 40 seconds. These times include diesel generator initiation time."

The value of 13 seconds was subtracted from the 40 seconds stated in the preceding excerpt to account for diesel generator initiation and signal generation time; this resulted in the test acceptance criteria of 27 seconds.

C. Corrective Steps Initiated During the Inspection

A review of all Residual Heat Removal (RHR) System procedures was initiated to determine applicability to this issue.

D. Corrective Steps Taken Since Inspection

1. The review of RHR system procedures was completed and identified the following procedures as being affected by this issue:
 - HC.OP-IS.BC-0105(Q) "Residual Heat Removal System Valves - Cold Shutdown - Inservice Test"
 - HC.OP-ST.BC-0004(5)(6)(7)(Q) "LPCI Subsystem ECCS Time Response Functional Test"
2. Procedure revision requests were initiated to incorporate the correct acceptance criteria into the procedures listed above.

The revision to HC.OP-IS.BC-0105(Q) was completed on May 15, 1992.

The revisions to HC.OP-ST.BC-0004(5)(6)(7)(Q) will be completed prior to their next scheduled performance during the fourth refueling outage scheduled to start in September, 1992.

E. Corrective Steps to Avoid Further Deviations

In addition to the review of RHR system procedures, PSE&G has completed a review of all Core Spray and High Pressure Coolant Injection System procedures for applicability to this issue. The review indicated all procedures to be consistent with the UFSAR, Technical Specifications, and GE Design Specifications.

F. Date When Corrective Steps Will be Completed

As detailed above, PSE&G will be in full compliance with this issue prior to startup from the fourth refueling outage scheduled to start in September, 1992.