

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) <p style="text-align: center;">HOPE CREEK GENERATING STATION</p>	DOCKET NUMBER (2) <p style="text-align: center;">05000354</p>	PAGE (3) <p style="text-align: center;">1 OF 4</p>
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TITLE (4)
Radioactive Effluent Samples Not Analyzed Within Required Surveillance Interval

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MORTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MORTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
07	08	97	97	015	00	07	31	97	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more) (11)								
POWER LEVEL (10)	96%	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)	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 Robin Ritzman, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) 609-339-1445
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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).	<input checked="" type="checkbox"/>	NO					

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

On July 8, 1997, Hope Creek Chemistry determined that Technical Specification 4.11.1.1.1 was routinely not being met. The composite samples were not being analyzed within the required monthly frequency. Technical Specification Surveillance Requirement 4.11.1.1.1 states that radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11.1.1.1-1. The table indicates that a monthly composite sample be analyzed for gross alpha on a monthly frequency. The cause of this event is attributed to an incorrect interpretation of the Technical Specification surveillance requirements by Chemistry personnel. As a result, the samples were not being sent to the vendor in an expeditious manner. Corrective actions include training, an increased sensitivity to the Technical Specification requirements, and an improved method to handle the subject samples. This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), any 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)
Liquid Waste Management System - EIIS Identifier (WD)

IDENTIFICATION OF OCCURRENCE

Discovery Date: July 8, 1997
Problem Report: 970708142

CONDITIONS PRIOR TO OCCURRENCE

The plant was in OPERATIONAL CONDITION 1 (POWER OPERATION), at approximately 96% of rated thermal power due to an end of cycle coastdown. There were no structures, systems, or components that were inoperable at the beginning of the event that contributed to the event.

DESCRIPTION OF OCCURRENCE

On July 8, 1997, Hope Creek Chemistry determined that Technical Specification Surveillance Requirement 4.11.1.1.1 was routinely not being met. The composite samples were not being analyzed within the required monthly frequency.

Hope Creek Technical Specification Surveillance Requirement 4.11.1.1.1 states that radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11.1.1.1-1. The table indicates that a monthly composite sample be analyzed for gross alpha on a monthly frequency.

This particular sample for gross alpha analysis is sent to an outside vendor for performance of the analysis required by the Technical Specifications. Chemistry personnel had interpreted the monthly surveillance requirement of the Technical Specification to mean that as long as the composite samples were prepared and shipped to the vendor every 31 days, the surveillance was met. In addition, due to this interpretation by Chemistry personnel, the samples were not being sent to the vendor in an expeditious manner to ensure that the results of the analysis were received by PSE&G within 31 days of the completion of liquid composite sampling.

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DESCRIPTION OF OCCURRENCE (Continued)

A review of other Technical Specification surveillances was conducted by Chemistry personnel to determine if other sampling requiring analysis by an outside vendor was complying with the required surveillance testing interval. This review identified that a similar problem existed with the quarterly gaseous and liquid composite samples for Sr-89 and Sr-90, quarterly gaseous sample analysis for gross alpha, and quarterly liquid composite sample analysis for tritium and Fe-55.

CAUSE OF OCCURRENCE

The cause of this event is attributed to an incorrect interpretation of the Technical Specification surveillance requirements by Chemistry personnel. As a result, the samples were not being sent to the vendor in an expeditious manner that would ensure that the results of the analysis were received by PSE&G within 31 days of the completion of liquid composite sampling.

PRIOR SIMILAR OCCURRENCES

In the past two years, there were no previously reported occurrences similar to the one described in this report.

SAFETY CONSEQUENCES AND IMPLICATIONS

There was no safety significance associated with the failure to complete the gross alpha analysis within the surveillance frequency. This is based on the fact that Hope Creek has not had any gross alpha analysis results above detectable and the length of the half-lives associated with the nuclides which decay by alpha particle ejection. Due to the length of the half-lives, the late analysis would not have significantly affected the results. In addition, alpha emitting nuclides would only be reasonably expected to be detected from sustained operations with fuel integrity breaches, which would be indicated by other analytical requirements. Hope Creek has not operated with any significant breach of fuel clad integrity.

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SAFETY CONSEQUENCES AND IMPLICATIONS (Continued)

Likewise, there was no safety significance associated with the past failures to perform the analysis within the required frequency for quarterly gaseous and liquid composite samples for Sr-89 and Sr-90, quarterly gaseous sample analysis for gross alpha, and quarterly liquid composite sample analysis for tritium and Fe-55. This is based on the fact that Hope Creek has not had any of the subject analysis results above the allowable limits. In addition, the half-lives for Sr-90 is 28.1 years, Fe-55 is 2.6 years, and tritium is 12.26 years. Therefore, the late analysis would not have significantly affected the results. The half-life for Sr-89 is 52 days, the latest Sr-89 analysis was 11 days late, which also would not have significantly affected the results of the analysis.

Although the late analysis of the composite samples would prevent timely notification to the NRC for releases that exceeded the Technical Specification limits, the analyzed composite samples demonstrate that the releases have been within the limits specified in Technical Specifications. Therefore, there was no impact to the health and safety of the public.

CORRECTIVE ACTIONS

1. The completion dates for the surveillance work orders to perform the analysis of the composite liquid and gaseous release sampling in accordance with Technical Specification Tables 4.11.1.1.1-1 and 4.11.2.1.2-1 will be revised prior to performance of the next surveillance to ensure that the analyses are completed within the required surveillance interval.
2. The Technical Specification interval was clarified to Chemistry personnel. Specifically, the analysis of the composite sample must be completed and reviewed by PSE&G personnel within 31 days of the completion of the composite sampling period. Additional training will be provided to Chemistry Supervisors on the importance of ensuring that sampling and analysis activities associated with Technical Specification surveillances are completed within the proper surveillance test interval. This training will be completed by August 15, 1997.
3. A method to expedite the processing of the radioactive effluent samples has been developed.