PSE&G

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

Nuclear Business Unit

AUG 15 1997

LR-N97487

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

**HOPE CREEK GENERATING STATION**
**DOCKET NO. 50-354**
**UNIT NO. 1**
**LICENSEE EVENT REPORT NO. 97-016-00**

Dear Sir:

This Licensee Event Report entitled, "Filtration, Recirculation and Ventilation System Technical Specification Surveillance Requirement Compliance," is being voluntarily submitted

Sincerely,

Mark Bezilla
General Manager -
Hope Creek Operations

Attachment

JPP
SORC Mtg. 97-050

C Distribution
LER File

IE22

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)

| FACILITY NAME (1) | DOCKET NUMBER (2) | PAGE (3) |
|---|---|---|
| Hope Creek Generating Station | 05000354 | 1 OF 3 |

TITLE (4)

## Filtration, Recirculation and Ventilation System Technical Specification Surveillance Requirement Compliance

| 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 |
| 07 | 16 | 97 | 97 | -- 016 -- | 00 | 08 | 14 | 97 | | 05000 |
| | | | | | | | | | FACILITY NAME | DOCKET NUMBER |
| | | | | | | | | | | 05000 |

| OPERATING MODE (9) | 1 |
|---|---|
| POWER LEVEL (10) | 93 |

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

| | | | |
|---|---|---|---|
| 20.2201(b) | 20.2203(a)(2)(v) | 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) | X OTHER |
| 20.2203(a)(2)(iii) | 50.36(c)(1) | 50.73(a)(2)(v) | Specify in Abstract below or in NRC Form 366A VOLUNTARY LER |
| 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) |
|---|---|
| J. Priest, Licensing and Regulation | (609) 339-5434 |

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 7/16/97, at 1330 hours, Hope Creek received notification from the NRC, via Hope Creek Technical Specification (TS) Amendment No. 99, dated 7/9/97, that the NRC considered that the monthly Filtration Recirculation and Ventilation System (FRVS) recirculation unit surveillance (TS 4.6.5.3.2.b) was being performed in a manner that did not provide compliance with Hope Creek's UFSAR commitments to USNRC Reg. Guide 1.52. As a result, the FRVS recirculation units were considered to be inoperable, and the provisions of TS 4.0.3 were utilized to delay the Shutdown Action requirements for 24 hours due to this missed surveillance. On 7/17/97, Hope Creek completed an UFSAR revision to justify an exception to USNRC Regulatory Guide 1.52 concerning heater operation for this surveillance test. With the licensing basis consistent with past FRVS surveillance testing methods, compliance with TS 4.6.5.3.2.b was restored and the FRVS recirculation units were considered to be operable at 1228 hours. The cause of this event was attributed to a failure to update the UFSAR to ensure clarity in the application of USNRC Regulatory Guide 1.52 to the FRVS surveillance requirements. There were no safety consequences associated with this event. This LER is being made on a voluntary basis since the provisions of 10CFR50.73 were not applicable to this event.

| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
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| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| Hope Creek Generating Station | 05000354 | 97 | -- 016 -- | 00 | 2 OF 3 |

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)
Filtration Recirculation & Ventilation System - EIIS Identifier {BH/-}*

*Energy Industry Identification System (EIIS) codes and component function identifier codes appear as {SS/CC}

IDENTIFICATION OF OCCURRENCE

Discovery date: July 16, 1997
Problem Report: 970716270

CONDITIONS PRIOR TO OCCURRENCE

The plant was in OPERATIONAL CONDITION 1 (POWER OPERATION) at approximately 93% of rated thermal power due to an end of cycle coastdown. No other structures, systems, or components were inoperable at the time of discovery that contributed to the event.

DESCRIPTION OF OCCURRENCE

On July 16, 1997, the Hope Creek Generating Station received notification from the NRC, via a statement in the Safety Evaluation Report contained in Hope Creek Technical Specification (TS) Amendment No. 99, dated July 9, 1997, that the NRC considered that the monthly FRVS recirculation unit surveillance (TS 4.6.5.3.2.b) was being performed in a manner that did not provide compliance with that TS requirement. In response to TS Amendment No. 99, at 1330 hours on July 16th, the FRVS recirculation units were declared inoperable.

TS 4.6.5.3.2.b requires the performance of a test of the FRVS recirculation units every 31 days for 10 hours to assure operability and reduce the buildup of moisture on the carbon adsorbers and HEPA filters. The Hope Creek surveillance is conducted with the equipped heaters cycling to control humidity in the FRVS process flow. However, the NRC determined that compliance with Hope Creek's licensing basis, specifically UFSAR commitments to USNRC Regulatory Guide 1.52, requires that these heaters be continuously energized during the 10 hour surveillance. As a result of the FRVS recirculation units being declared inoperable, the provisions of TS 4.0.3 were utilized to delay the Shutdown Action requirements for 24 hours due to this missed surveillance. On July 17, 1997, Hope Creek completed a UFSAR revision to justify an exception to USNRC Regulatory Guide 1.52 concerning heater operation for this surveillance test. With the licensing basis for performing this surveillance consistent with the past FRVS surveillance testing methods, compliance with TS 4.6.5.3.2.b was restored and the FRVS recirculation units were declared operable at 1228 hours on July 17, 1997.

APPARENT CAUSE OF OCCURRENCE

As described in LER 91-007-02, the monthly FRVS surveillance procedure was modified in 1991 to have the FRVS heaters cycle during this test and not continuously dissipate heat. However, the procedure revisions failed to recognize the need to justify the exception from commitments to USNRC Regulatory Guide 1.52 requirements contained in Hope Creek's UFSAR. Failure to update the UFSAR to clarify our application of USNRC Regulatory Guide 1.52 requirements in regard to FRVS surveillance testing also resulted in the NRC's partial denial of a license change request to clarify the TS as stated in Hope Creek TS Amendment No. 99.

ASSESSMENT OF SAFETY CONSEQUENCES

There were no safety consequences associated with this event. On July 17, 1997, a 10CFR50.59 safety evaluation was completed to formally justify exceptions to USNRC Regulatory Guide 1.52 concerning heater operation for this surveillance test. With the licensing basis for performing this surveillance consistent with the past FRVS surveillance testing methods, compliance with TS 4.6.5.3.2.b was restored and the FRVS recirculation units were declared operable. The 10CFR50.59 safety evaluation concluded that the FRVS testing method used since 1991 adequately demonstrates and maintains FRVS recirculation unit operability. There was no impact to the public health and safety.

PREVIOUS OCCURRENCES

LER 91-007-02 documented the failure of FRVS components during the course of performing this monthly surveillance test due to blown fuses in the heater control circuits. One of the corrective actions taken for that event was to revise the FRVS testing method to allow the FRVS heaters to cycle during the 10 hour test. As stated in the apparent cause for this event, the failure to properly revise pertinent licensing basis information for these surveillance procedure changes resulted in the event described in this LER.

CORRECTIVE ACTIONS

On July 17, 1997, a 10CFR50.59 safety evaluation was completed to formally justify an exception to USNRC Regulatory Guide 1.52 concerning heater operation for this surveillance test. The 10CFR50.59 safety evaluation concluded that the FRVS testing method used since 1991 adequately demonstrates and maintains FRVS recirculation unit operability.

A License Change Request will be submitted by August 31, 1997, to clarify the FRVS TS. The changes to the TS will reflect the manner in which the FRVS surveillances are performed and remove ambiguity concerning compliance.