



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

Nuclear Business Unit

NOV 16 1999

LR-N99480

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

**HOPE CREEK GENERATING STATION
DOCKET NO. 50-354
UNIT 1
LER 354/99-012-00**

Gentlemen:

This Licensee Event Report entitled "Inadequate Performance of Primary Containment Integrity Verification" is being submitted pursuant to the requirements of the Code of Federal Regulations 10 CFR 50.73(a)(2)(i)(B).

Commitments being made by Public Service Electric & Gas Company in connection with this LER are listed in the attachment.

Sincerely,

M. B. Bezilla
Vice President - Operations

Attachment

PRD/

C Distribution
LER File 3.7

IED2

The power is in your hands.

PRD A DOC IL 0500354 S

**ATTACHMENT
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NUMBER 50-354
LER 354/99-012-00 COMMITMENTS**

1. The surveillance procedure for PRIMARY CONTAINMENT INTEGRITY verification will be verified for the valves in the TIP room and in the main steam tunnel during the next refueling outage.

FACILITY NAME (1)
Hope Creek Generating Station

DOCKET NUMBER (2)
05000354

PAGE (3)
1 OF 4

TITLE (4)
Inadequate Performance of Primary Containment Integrity Verification

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
10	17	98	99	012	00	11	16	99		05000
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
		20.2201(b)	20.2203(a)(1)	20.2203(a)(2)(i)	20.2203(a)(3)(i)	20.2203(a)(3)(ii)
1	100			X		

LICENSEE CONTACT FOR THIS LER (12)

NAME Paul Duke, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) 856-339-1466
--	---

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)	EXPECTED	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 October 18, 1999, PSE&G discovered that containment isolation valve position verification was not performed properly for eleven valves during several monthly verifications conducted in the last year. The eleven valves are used for Type B containment penetration leak rate testing. The apparent cause for this event was an inadequate revision to the surveillance procedure for PRIMARY CONTAINMENT INTEGRITY verification. Corrective actions included field verification that the valves were closed and revisions to the surveillance procedure for PRIMARY CONTAINMENT INTEGRITY. This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by Technical Specifications.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Hope Creek Generating Station	05000354				2 OF 4
		99	-- 012 --	00	

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)
Primary Containment - EIIS Identifier {NH/--}*

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

IDENTIFICATION OF OCCURRENCE

Event Date: October 17, 1998
Discovery Date: October 18, 1999

CONDITIONS PRIOR TO OCCURRENCE

The plant was in OPERATIONAL CONDITION 1 (POWER OPERATION) at 100% of rated thermal power. No other structures, systems, or components were inoperable at the time of the occurrence that contributed to the event.

DESCRIPTION OF OCCURRENCE

On October 18, 1999, PSE&G discovered that containment isolation valve position verification was not performed properly for eleven valves during the monthly verifications conducted in October and December 1998 and in January, April, May, June, July and August 1999. The eleven valves are used for Type B containment penetration leak rate testing.

Technical Specification Surveillance Requirement (SR) 4.6.1.1.b requires verification at least once per 31 days that all primary containment penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position.

The plant procedure for PRIMARY CONTAINMENT INTEGRITY verification satisfies SR 4.6.1.1.b by monthly verification of valve position status for manual primary containment isolation valves in the valve status database (TRIS+) and also by monthly field verification. For valves located in high radiation areas outside containment, field verification may be waived.

During a review of the surveillance procedure, it was noted that the field verification was waived in October and December 1998 and in January, April, May, June, July and August 1999 for eleven valves used for Type B containment penetration leak rate testing. The valves were incorrectly listed as being located in room 4321, which is currently a high radiation

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Hope Creek Generating Station	05000354	99	-- 012 --	00	3 OF 4

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

DESCRIPTION OF OCCURRENCE (continued)

area. The valves are actually located in room 4320, which is not currently a high radiation area.

This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by Technical Specifications. The event described here was discovered during a review of plant records dating back to October 1998. However, it is likely that additional instances of noncompliance with SR 4.6.1.1.b for these eleven valves occurred before October 1998.

APPARENT CAUSE OF OCCURRENCE

The apparent cause for this event was an inadequate revision to the surveillance procedure for PRIMARY CONTAINMENT INTEGRITY verification in October 1996. The eleven valves that are the subject of this LER were incorrectly listed as being located in room 4321, which is currently a high radiation area. As a result, field verification of valve position was waived for these valves.

SAFETY SIGNIFICANCE AND IMPLICATIONS

PRIMARY CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This requirement, in conjunction with the leakage rate limitation, will limit the site boundary radiation doses to within the limits of 10 CFR Part 100 during accident conditions.

There were no actual safety consequences associated with this condition. The eleven valves were verified to be closed during primary containment integrity verifications performed in November 1998 and in February, March and September 1999. In those instances where field verification was not performed, the valves' position status was verified in the TRIS+ database. The valves are used for containment penetration leak rate surveillance testing. After the testing is completed, the valves are checked and independently verified to be in the correct closed position. Since the valves were confirmed to be in the correct position, and position status was checked monthly, a valve mispositioning error is highly unlikely. This event did not affect the health and safety of the public.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Hope Creek Generating Station	05000354				4 OF 4
		99	-- 012 --	00	

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

PREVIOUS OCCURRENCES

A review of previously reported events identified two instances within the last three years in which required PRIMARY CONTAINMENT INTEGRITY verification was not adequately performed.

LER 354/95-033-04 reported an event in which certain primary containment penetration test and drain valves were not periodically verified to be closed in accordance with the requirements of TS SR 4.6.1.1.b. The valves had been omitted from the procedure that verifies PRIMARY CONTAINMENT INTEGRITY. The omitted valves were then added to the surveillance procedure. A review of all primary containment penetrations was performed as a corrective action for this event, and LER 354/95-033-11 reported that approximately 390 additional containment isolation valves were identified that also had not been previously verified in accordance with TS SR 4.6.1.1.b. A verification of these valves was performed promptly and the surveillance procedure was revised to include the required components.

LER 354/98-006-00 reported an event in which containment isolation valve position verification was not performed properly for a test valve located within the containment isolation boundary for the Standby Liquid Control system discharge line. As a corrective action for this event, the surveillance procedure for PRIMARY CONTAINMENT INTEGRITY verification was revised to ensure current area radiological conditions are assessed in determining when field verification of valve position is required.

Both this event and the event described in LER 354/98-006-00 resulted from the procedure revisions made in October 1996 as a corrective action for LER 354/95-033-11.

CORRECTIVE ACTIONS

1. A field verification of manual valves required for PRIMARY CONTAINMENT INTEGRITY located outside containment (except valves in the Traversing Incore Probe room and in the main steam tunnel) was performed. All valves were confirmed to be in their correct position and no other discrepancies were found in the list of valves in the surveillance procedure. The surveillance procedure will be verified for the valves in the TIP room and in the main steam tunnel during the next refueling outage.
2. The surveillance procedure for PRIMARY CONTAINMENT INTEGRITY was revised to correct the discrepancies in valve location.