

HC SSDI/NOED TIME LINE

Wed. 12/11	~11:30 am	After reviewing the applicable testing procedure, an SSDI Inspector (Pindale) questioned System Engineer (Dave Bartlett) on why it appeared that the individual inputs for each of the 86 relays (86R, 86B, & 86F) for all four EDGs were not fully tested per TS 4.8.1.1.2.h.14 a, b & c. Bartlett did not know the why not and stated that another engineer (George Daves) would be more knowledgeable about EDG testing.
	~3:30 pm	Later that day, Pindale questioned G. Daves on the apparent TS/procedure conflict. G. Daves acknowledged there was an apparent problem with the testing procedure in question, and agreed to check on the extent of testing.
Thurs. 12/12	1:07 pm	As a result of NRC questions, PSEG declared all four EDGs inoperable; entered TS 4.0.3 (which mandated 24 hours to complete the missed surveillance testing)
Fri. 12/13	~8:00 am	SSDI Inspector noted all corrective action/testing focus was on TS 4.8.1.1.2.h.14a only (not b & c). Inspector and HC SRI questioned licensee (Operations and System Engineer) regarding other sections.
	11:20 am	Licensee recognized they did not meet TS 4.8.1.1.2.h.14 (b&c) for EDGs 'A' and 'C' and entered TS 4.0.3. (which mandated 24 hours to complete the missed surveillance testing) PSEG concluded the testing for the B & D EDGS had been previously completed within 18 months. This was NOT verified by the SSDI team.
	2:00 pm	Commenced conference call to discuss NOED (testing while not shutdown, as stated in TS). PSEG initially stated that a NOED was not needed and that they could do the testing at power without NRC approval. In fact, some online testing had been performed by the licensee subsequent to declaring all four EDGs inoperable. NRC disagreed during the call. PSEG recanted and sought approval for the testing.
	2:39 pm	EDG testing had already been in progress and PSEG (Gabe Salomon) reported that they considered EDG 'A' testing complete.
	~4:30 pm (check time)	NOED conference call concluded. Team inspectors (Schmidt/Pindale confirmed with licensee that the licensee would be prepared with drawings, completed tests, etc. on Monday morning, between 7-7:30 am to discuss completed testing activities, demonstrating compliance with TS 4.8.1.1.2.h.14(a-c).
	xxxxx (need best time estimate)	Licensee considered EDG 'A' testing complete [SCOTT: I CAN'T EXPLAIN THIS ENTRY. IT MAY RELATE TO WHEN LICENSEE THOUGHT <u>ALL</u> EDGS WERE COMPLETELY TESTED.
Mon. 12/16	7:30 am	SSDI Inspectors met with licensee and noted that they were not prepared to discuss completed testing since they did not have the necessary drawings and completed test paperwork.

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	10:30 am	Team inspectors met with licensee and determined that the licensee did not fully test TS 4.8.1.1.2.h14.c in that only one of the four parallel inputs to relay 86F was tested (for all 4 EDGs).
	1:00 pm	Conducted SSDI team exit meeting. Discussed concern that licensee was not prepared to discuss testing issue, testing was not completed satisfactorily, and there is still an outstanding concern regarding TS compliance re: EDG operability.
Wed. 12/18	9:00 am	Licensee informed team inspectors (Schmidt/Pindale), that they believe to be in compliance with TS 4.8.1.1.2.h.14 (a, b & c) in its entirety. Further, they believe that the testing currently conducted (tripping the three relays only) fully implements the TS. That is, any supplemental testing that was conducted since 12/12 was not necessary.
	3:00 pm	Conducted conference call with licensee, NRR, resident inspectors, RI management and SSDI team members. Licensee reiterated their position that they comply with TS 4.8.1.1.2.h.14 (a, b & c) . The NRC disagreed with this position and informed the licensee that the NRC considered them to be in violation of Technical Specifications. Licensee stated that although they disagree with the NRC's position, they would complete the testing for the remaining inputs to the 86F relays.

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