



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

Nuclear Business Unit

MAR 28 1996

LR-N96086

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

Attn.: Document Control Desk

Dear Sir:

HOPE CREEK GENERATING STATION
LICENSE NO. NPF-57
DOCKET NO. 50-354
UNIT NO. 1
LICENSEE EVENT REPORT NO. 96-004-00

This Licensee Event Report entitled "Missed Surveillance Requirement - Overdue Inservice Testing for the "D" SACS and "B" SSW Pumps" is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

Sincerely,

M. E. Reddemann
General Manager -
Hope Creek Operations

Attachment LER
SORC Mtg. 96-041
JJK

C Distribution
LER File 3.7

9604020372 960328
PDR ADDCK 05000354
S PDR

3050

The power is in your hands.

EXPIRES 04/30/98

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 HR.
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 F37), U.S. NUCLEAR
REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO
THE PAPERWORK REDUCTION PROJECT

FACILITY NAME (1)

HOPE CREEK GENERATING STATION

DOCKET NUMBER (2)

05000-354

PAGE (3)

1 OF 5

TITLE (4)

Missed Surveillance Requirement - Overdue Inservice Testing for the "D" SACS and "B" SSW Pumps

EVENT DATE (6)			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
02	29	96	96	-- 004	-- 00	03	28	96	FACILITY NAME	DOCKET NUMBER
										05000
										05000
OPERATING MODE (9)		5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
			20.2201(b)			20.2203(a)(2)(v)		X	50.73(a)(2)(i)(B)	50.73(a)(2)(viii)
POWER LEVEL (10)		0	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	TELEPHONE NUMBER (Include Area Code)
Jeff Keenan, Licensing	609 - 339 - 5429

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NFRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NFRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE.)	X NO	EXPECTED SUBMISSION	MONTH	DAY	YEAR

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

On February 29, 1996, it was discovered that the required Inservice Test (IST) surveillances for the 'D' Safety Auxiliaries Cooling System pump and the 'B' Station Service Water pump were not performed within their specified test interval, including the allowable extension period. This testing had been inappropriately postponed based on allowances in the American Society of Mechanical Engineers (ASME) Code provided to the Operations shift from the Inservice Testing (IST) Engineer. In addition, Operations did not adequately challenge the ASME Code allowance and did not correctly apply Technical Specification requirements. Upon discovery of the omission, appropriate Technical Specification actions were taken. Successful IST surveillance testing was performed on both pumps. The root causes of the event include less than adequate oversight of operations communications, lack of a questioning attitude by operations personnel, the surveillance testing program and operational department procedures not adequately implemented, no formal guidance for developing and providing engineering memos to the operating shift, and less than adequate guidance provided from the IST engineer. Corrective actions include providing ASME Code and Technical Specification interrelationship instruction, procedure enhancements, clarification of responsibilities, assessment of human performance, and guidance on use of engineering memos for operational guidance.

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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)
Safety Auxiliaries Cooling System (SACS)- EIIS Identifier {CC}
Station Service Water System - EIIS Identifier {BI}

IDENTIFICATION OF OCCURRENCE

Event Date: January 26, 1996
Discovery Date: February 29, 1996

CONDITIONS PRIOR TO OCCURRENCE

Plant in OPERATIONAL CONDITION 5 (Refueling)
Reactor at 0% of Rated Power

DESCRIPTION OF OCCURRENCE

On February 29, 1996, it was discovered that the required surveillance tests for the 'D' Safety Auxiliaries Cooling System (SACS) pump and the 'B' Station Service Water (SSW) pump were not performed within their specified frequency, including the allowable extension period. This condition was identified by a quality assurance inspector during a control room observation. A letter from the Inservice Testing Engineer dated January 25, 1996, was found in the shift night orders. The letter provided guidance for Inservice Testing (IST) program testing during periods of plant shutdown. The guidance provided a specific recommendation that during shutdown periods normal test frequency is not mandatory, but should continue if it can reasonably be accomplished. The letter further provided that if a pump is not tested during plant shutdown, the pump shall be tested within one week after the plant is returned to normal operations. The letter was based on an allowance in the American Society of Mechanical Engineers (ASME) Code - Section XI - Article IWP - Paragraph IWP-3400 - Subparagraph (a). The Technical Specifications provide no explicit IST surveillance performance interval for the SACS or SSW pumps, except for the general IST testing requirements of section 4.0.5. The applicable operational condition for the SACS and SSW pumps are specified in Technical Specification sections 3.7.1.1 and 3.7.1.2, these sections apply during refueling (Operational Condition 5).

On January 25, 1996, relying on the letter, two Nuclear Shift Supervisors (NSS) completed an action statement log sheet, per procedure, postponing the testing of the 'D' SACS pump. The 'D' SACS pump testing period expired on January 26, 1996. An additional letter was issued to operations by the IST

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engineer regarding the SSW pump testing, again stating that the code allows deferral of testing during outages. Based on the two letters the 'B' SSW pump testing was postponed. The 'B' SSW pump testing period expired on February 18, 1996.

On February 29, 1996, the letter was determined to be inaccurate with respect to Technical Specification requirements. Both pumps are required to be operable during Operational Condition 5. The testing and equipment status log were then reviewed for potential overdue tests. The 'D' SACS pump was declared inoperable and the 'B' SSW pump was confirmed to be out of service. The letter from the IST engineer was removed from the shift night orders. The 'D' SACS pump was declared operable after satisfactory IST test performance on March 1, 1996. The 'B' SSW pump was declared operable after a satisfactory post maintenance IST test performed March 8, 1996.

ANALYSIS OF OCCURRENCE

Surveillance testing for equipment is controlled by procedures and computer generated recurring tasks. Technical Specifications are the responsibility of the Operations crew. Technical experts, like the IST program engineer, are used as consultants by Operations to make informed Technical Specification decisions. The above barriers failed to preclude the missed surveillance.

Operations did not adequately challenge the IST letter. In addition, there was a misunderstanding of how the ASME Code and Technical Specifications interrelate. Specifically, if equipment is required to be operable for a certain operational condition, then the IST testing must also be performed for the equipment despite any allowance provided in the ASME Code. The action tracking documents for postponing equipment testing were completed by two NSSs; however, the equipment was considered operable, therefore no Technical Specification action statements were entered when the surveillance testing exceeded the maximum allowed extension period.

The information provided to operations lacked relevant information to link the ASME Code allowance with the Technical Specification section 4.0.5 requirements. The letters from the technical expert to Operations did not address requirements or ramifications of deviating from normal pump test frequencies nor was there any engineering supervisory approval. A secondary review of the letters was conducted for incorporation into the shift night orders; however, this review did not adequately challenge the letter.

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APPARENT CAUSE OF THE OCCURRENCE

The root causes of the event include less than adequate oversight of operations communications, lack of a questioning attitude by operations personnel, the surveillance testing program and operational department procedures not being adequately implemented, no formal guidance for developing and providing engineering memos to the operating shift, and less than adequate guidance provided from the IST engineer.

ASSESSMENT OF SAFETY CONSEQUENCES

This event had no safety consequences. The pumps in question were capable of performing their design functions during the period that the surveillance tests exceeded the test frequency as demonstrated by subsequent testing. In addition, redundant equipment was available and operable. The 'D' SACS pump surveillance test was successfully completed on March 1, 1996. The 'B' SSW pump was out of service for planned maintenance when the overdue surveillance was discovered. The 'B' SSW pump IST testing was successfully completed following post maintenance restoration testing on March 8, 1996.

Failure to perform the required surveillance on the 'D' SACS pump by January 18, 1996, and the 'B' SSW pump by February 18, 1996, as both pumps were in service and required to be operable is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), as an operation or condition prohibited by the plant's Technical Specification.

PREVIOUS OCCURRENCES

A review of LERs identified one LER involving a missed Technical Specification section 4.0.5 surveillance test. In LER 93-002-00, IST valve testing was missed due to an increased frequency rescheduling error following maintenance work. The generic missed surveillance issues, not including section 4.0.5 specific issues, are being addressed by the Technical Specification Surveillance Improvement Program (TSSIP); see LER 95-033-03.

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CORRECTIVE ACTIONS

- 1) The ASME Cod letter was removed from the shift night orders.
- 2) Technical Specification review and training meetings were conducted with Supervisory and Management personnel.
- 3) Specific instructions to operations shift and ISI/IST personnel will be provided to address how the ASME Code interrelates to the Technical Specification requirements. The instruction will be completed by May 31, 1996.
- 4) Revise procedure "Operations Department Information System", HC.OP-AP.ZZ-105(Q), to reflect current staff positions and clarify responsibilities. This revision will also strengthen controls and reviews of communications that impact Technical Specification decisions. This revision will be completed by May 31, 1996.
- 5) Review operations department responsibilities for surveillance testing. The specific shortcoming of not prioritizing and highlighting soon to be overdue and overdue Surveillance Tests will be addressed. This review will be completed by May 31, 1996.
- 6) The Hope Creek Operational Action Plan and procedure "Operations Standards", HC.OP-DD.ZZ-0004(Z), have been implemented to assess and improve Operations shift performance in the areas of human performance, including maintaining a questioning attitude culture. A self assessment of the effectiveness of these programs will be conducted by August 30, 1996.
- 7) Reinforce to ISI/IST personnel that ISI/IST communications to the Operations department needs to clearly communicate Technical Specification ramifications and have engineering supervisory approval. This action will be completed by May 31, 1996.