



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

Nuclear Business Unit

AUG 15 1996

LR-N96250

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

Dear Sir:

HOPE CREEK GENERATING STATION
DOCKET NO. 50-354
UNIT NO. 1
LICENSEE EVENT REPORT NO. 96-020-00

This Licensee Event Report entitled "Operation In A Condition Prohibited by Technical Specifications - Failure to Appropriately Perform Actions for Inoperable Radioactive Gaseous Effluent Monitoring Instrumentation." is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

Sincerely,

Mark Bezilla
General Manager -
Hope Creek Operations

Attachment

JPP
SORC Mtg. 96-078

C Distribution
 LER File

200078

9608210259 960819
PDR ADDCK 05000354
S PDR

The power is in your hands.

Attachment A

The following items represent commitments that Public Service Electric & Gas (PSE&G) made to the Nuclear Regulatory Commission (NRC) relative to this LER (354/96-020-00). The commitments are as follows:

Radiation Protection department procedure revisions for Technical Specification sampling will be reviewed with Radiation Protection department personnel by August 30, 1996.

Continuing training for Radiation Protection department personnel will include a session on Technical Specification compliance, which will be completed by December 31, 1996.

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)

Hope Creek Generating Station

DOCKET NUMBER (2)

05000354

PAGE (3)

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TITLE (4)

Operation In A Condition Prohibited by Technical Specifications - Failure to Appropriately
Perform Actions for Inoperable Radioactive Gaseous Effluent Monitoring Instrumentation.

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
7	19	96	96	-- 020	-- 00	8	19	96	FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)			1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
POWER LEVEL (10)			100			20.2201(b)				
						20.2203(a)(1)				
						20.2203(a)(2)(i)				
						20.2203(a)(2)(ii)				
						20.2203(a)(2)(iii)				
						20.2203(a)(2)(iv)				
						20.2203(a)(3)(i)				
						20.2203(a)(3)(ii)				
						20.2203(a)(4)				
						50.36(c)(1)				
						50.36(c)(2)				
						50.73(a)(2)(i)(B)				
						50.73(a)(2)(ii)				
						50.73(a)(2)(iii)				
						50.73(a)(2)(iv)				
						50.73(a)(2)(v)				
						50.73(a)(2)(vii)				
						50.73(a)(2)(viii)				
						50.73(a)(2)(x)				
						73.71				
						OTHER				
						Specify in Abstract below or in NRC Form 366A				

LICENSEE CONTACT FOR THIS LER (12)

NAME

James Priest, Licensing and Regulation

TELEPHONE NUMBER (Include Area Code)

(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)

YES (If yes, complete EXPECTED SUBMISSION DATE).	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	X				

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

On 7/2/96, at 0913 hours, the South Plant Vent radioactive gaseous effluent monitor (SPV RMS) was declared inoperable to support troubleshooting. The ACTION Statements for Limiting Condition for Operation (LCO) 3.3.7.11 requires, in part, that grab samples be taken at least once per 12 hours. On 7/19/96, during a comparison of a chemistry analysis data sheet information against departmental Technical Specification Action Logs, Radiation Protection department personnel confirmed that there were discrepancies in recorded sample times. As a result of these discrepancies, Radiation Protection department personnel concluded that on several occasions, the 12 hour frequency specified in ACTION Statement 123 to Technical Specification 3.3.7.11 was exceeded. The causes of these discrepancies were due to inattention to detail and less than adequate procedural guidance. Corrective actions include personnel coaching and procedure revisions to specify more frequent sampling to ensure Technical Specification compliance.

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		96	-- 020 --	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)
South Plant Vent Radioactive Gaseous Effluent Monitoring Instrumentation - EIIS
Identifier {IL}

IDENTIFICATION OF OCCURRENCE

Discovery date: 7/19/96
Date determined to be reportable: 7/19/96
Problem Report 960719183

CONDITIONS PRIOR TO OCCURRENCE

Plant was in OPERATIONAL CONDITION 1 (POWER OPERATION) at 100% of rated thermal power.

DESCRIPTION OF OCCURRENCE

On 7/2/96, at 0913 hours, the South Plant Vent radioactive gaseous effluent monitor (SPV RMS) was declared inoperable to support troubleshooting (see Hope Creek Special Report 96-01, sent via LR-N96207, dated July 16, 1996, for additional details). Limiting Condition for Operation (LCO) 3.3.7.11, ACTION Statements 122, 123 and 125 were entered for the inoperable SPV RMS. These ACTION Statements require that: 1) the flow rate via this pathway be estimated at least once per 4 hours (for an inoperable flow rate monitor or sampler flow rate monitor); 2) grab samples be taken at least once per 12 hours and analyzed for gross activity within 24 hours (for an inoperable noble gas activity monitor); and 3) samples are continuously collected with auxiliary sampling equipment within 8 hours as required in Table 4.11.2.1.2-1 (for an inoperable particulate sampler or iodine sampler).

On 7/19/96, during a comparison of chemistry analysis data sheet information against departmental Technical Specification Action Logs, Radiation Protection department personnel confirmed that there were discrepancies in recorded sample times. As a result of these discrepancies, Radiation Protection department personnel concluded that on several occasions, the period between required noble gas grab samples exceeded the 12 hour frequency specified in ACTION Statement 123. Specifically, from 7/3/96 to 7/18/96, there were six occasions where the required sample was taken in excess of 12 hours. Five samples were approximately 5 minutes overdue and one sample was taken approximately 37 minutes beyond 12 hours. After this issue was identified, the frequency of grab samples and flow estimations required by ACTION Statements 122 and 123 was increased to ensure that the requirements of the Technical Specification ACTION statement would be met. These actions were continued until 7/24/96, when the SPV RMS was declared operable and the associated ACTION Statements were exited.

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ANALYSIS OF OCCURRENCE

On 7/19/96, Radiation Protection department personnel determined that the noble gas grab samples required by LCO 3.3.7.11, ACTION 123, were not taken on several occasions within the 12 hour limit required by the Technical Specifications. Failure to appropriately perform these actions within the limits of the Technical Specification TS requirements is a condition prohibited by the Technical Specifications, which is reportable under the provisions of 50.73(a)(2)(i)(B).

APPARENT CAUSE OF OCCURRENCE

The late noble gas grab samples were taken as a result of inaccurate recordings of grab sample times. Although the chemistry analysis data sheets recorded the actual time that the sample was taken, the Technical Specification Action Log was updated to indicate that the time that the grab sample was taken was exactly 12 hours from the previous grab sample. Since the sample time listed in the Technical Specification Action Log (and not the actual time listed in the chemistry analysis data sheets) was used to determine the time when the next grab sample was required, on several occasions grab samples were taken at intervals that exceeded the 12 hour limit required by the Technical Specifications.

The causes of the inaccurate log keeping were due to inattention to detail and less than adequate procedural guidance. The individuals involved in the recording of sample times did not fully understand the impact that the early sampling had on Technical Specification compliance. This issue may have impacted Technical Specification compliance for previous occurrences where compensatory actions (i.e., grab samples and flow estimations) were required.

ASSESSMENT OF SAFETY CONSEQUENCES

The SPV RMS takes a continuous representative sample from the ventilation air that is exhausted from the SPV. Provisions for grab sampling are included in the SPV RMS design to enable the determination of radionuclide concentrations by onsite laboratory analysis. Releases of radioactive materials via the SPV are postulated during normal plant operation. During accident conditions, all flows from compartments that could be expected to release significant radioactive materials can be isolated.

As discussed previously, the duration of time in which the required 12 hour interval was exceeded was relatively short. The subsequent grab samples taken and corroborating radiation monitors did not indicate any abnormal radiation concentrations. Therefore, there was no safety significance associated with this event.

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PREVIOUS OCCURRENCES

Recently, two previous occurrences were documented for failure to perform required sampling within Technical Specification time limits. LER 95-027-00 documented an occurrence where an Offgas System sample was not taken in the time required by the Technical Specifications and LER 95-030-00 documented an occurrence where a Filtration, Recirculation and Ventilation System noble gas sample was not taken in the time required by the Technical Specifications. In addition, LER 95-027-00 documented previous occurrences where a 25% "grace period" was inappropriately applied to the Technical Specification Action Statement times for compensatory sampling. The corrective actions from those events would not have prevented the occurrence described in this LER.

CORRECTIVE ACTIONS

As stated previously, the frequency of grab samples and flow estimations was increased to ensure compliance with Technical Specification Action Statements 122 and 123.

Lessons learned from this event were rolled out to Radiation Protection department personnel. Specifically, the impact of early samples on Technical Specification compliance and sample time documentation were discussed with these personnel. In addition, continuing training for Radiation Protection department personnel will include a session on Technical Specification compliance and will be completed by December 31, 1996.

Radiation Protection department procedures for Technical Specification sampling were revised to specify more frequent sampling times. These procedure revisions will be reviewed with Radiation Protection department personnel by August 30, 1996.

The individuals involved in this event were appropriately coached concerning their deficient questioning attitude in considering the effects of early sampling.