



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

Nuclear Business Unit

AUG 26 1996

LR-N96269

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. 95-033-10

This Licensee Event Report supplement entitled "Technical Specification Surveillance Requirement Implementation Deficiencies" is being submitted pursuant to 10CFR50.73(a)(2)(i)(B).

Sincerely,

Mark Bezilia  
General Manager,  
Hope Creek Operations

JWK  
SORC Mtg. 96-079

C Distribution  
LER File

030072

9609050130 960826  
PDR ADOCK 05000354  
S PDR

IF2211

The power is in your hands.

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Attachment A

The following item represents the commitment that Public Service Electric & Gas is making to the Nuclear Regulatory Commission relative to LER 354/95-033-10:

1. Surveillance test procedure HC.OP-ST.SF-0001(Q) will be revised to include testing of the previously omitted portions of the SDV Bypass logic. This procedure revision will be implemented by June 19, 1997.

## 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  
(7-6 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.

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TITLE (4)

## Technical Specification Surveillance Requirement Implementation Deficiencies

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
11	14	95	95	033	10	8	26	96	FACILITY NAME	DOCKET NUMBER
										05000
									FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)		4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
			20.2201(b)			20.2203(a)(2)(v)			<input checked="" type="checkbox"/> 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)			<input checked="" type="checkbox"/> 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

John Karrick, Hope Creek LER Coordinator

TELEPHONE NUMBER (Include Area Code)

(609) 339-5298

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs
D	CC	V	L200						

## SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).		NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input checked="" type="checkbox"/>				10	31	96

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

LER 95-033-00 described two events that occurred due to identification of a Technical Specification (TS) surveillance test inadequacy. On 11/14/95, the Technical Specification Surveillance Improvement Program (TSSIP) team determined that the undervoltage auxiliary relays were not adequately tested in accordance with the LOGIC SYSTEM FUNCTIONAL TEST (LSFT) requirements. As stated in LER 95-033-01, supplements would be transmitted to document additional findings of the TSSIP team. In addition to the findings described in previous supplements to this LER, on 7/25/96 and 7/26/96, the TSSIP team discovered two surveillance requirements that had not been completely fulfilled in the past. These surveillances involved the Reactor Protection System Scram Discharge Volume Bypass Logic LSFT and inspections of the Reactor Building to Suppression Chamber Vacuum Breaker Assemblies. This supplement provides the details of these events which is being reported (similar to the events in the prior supplements) under the provisions of 10CFR50.73(a)(2)(i)(B). These conditions have existed due to ineffective reviews of procedures that implement TS requirements. Corrective actions include completion of the required surveillances, surveillance test procedure revisions, and continuation of comprehensive reviews of procedures implementing TS surveillance requirements.

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PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor (BWR/4)

Safety Auxiliaries Cooling System (SACS) - EIIS Identifier {CC}

Reactor Water Cleanup System (RWCU) - EIIS Identifier {CE}

4.16 KVAC - EIIS Identifier {EB}

Emergency Diesel Generator - EIIS Identifier {EK}

High Pressure Coolant Injection System - EIIS Identifier {BJ}

Average Power Range Monitor System - EIIS Identifier {IG}

Traversing Incore Probe - EIIS Identifier {IG}

Annunciator System - EIIS Identifier {IB}

Plant Protection System - EIIS Identifier {JC}

Containment Vacuum Relief System - EIIS Identifier {BF}

IDENTIFICATION OF OCCURRENCE

Discovery dates: 11/14/95, 12/12/95, 1/4/96, 2/26/96, 3/25/96, 3/29/96,  
5/8/96, 5/10/96, 6/24/96, 6/25/96, 6/27/96, 7/8/96,  
7/18/96, 7/19/96, and 7/25/96.

ESF actuation date: 11/16/95

Problem Reports: 951114174, 951116123, 951212158, 960104265, 960226156,  
960322230, 960326238, 960430230, 960509086, 960624084,  
960625200, 960627098, 960708161, 960719224, 960718069,  
960725055, and 960726084.

CONDITIONS PRIOR TO OCCURRENCE

For the events in this LER the plant was in various operational conditions.

DESCRIPTION OF OCCURRENCE

LER 95-033-00 described two events that occurred due to identification of a Technical Specification (TS) Surveillance Test inadequacy. This supplement rewrites the original LER to describe an additional occurrence of a TS surveillance implementation deficiency identified during the Technical Specification Surveillance Improvement Program (TSSIP) review.

Undervoltage Relay Testing and ESF Actuation

On November 14, 1995, during the TSSIP review of TS 3.3.3, "Emergency Core Cooling System Actuation Instrumentation", it was determined that the undervoltage auxiliary relays were not adequately tested in accordance with the LOGIC SYSTEM FUNCTIONAL TEST (LSFT) requirements of TS 4.3.3.2. As a result, the vital bus undervoltage relays were declared inoperable, and the TS Action Statement was entered for the failure to perform the appropriate surveillance testing. The surveillance test was revised to address the concerns that TSSIP identified. On November 16, 1995, during the performance of the revised surveillance on the 'A' 4 kV vital bus, a bus transfer

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**DESCRIPTION OF OCCURRENCE (Continued)**

occurred at 0521. The 'A' Loss of Offsite Power (LOP) Sequencer initiated per plant design. A four-hour report was made to the NRC at 0841 in accordance with 10CFR50.72(b)(2)(ii).

**RTD and T/C Channel Calibrations**

On December 12, 1995, the TSSIP team determined that channel calibrations for the Reactor Water Cleanup System (RWCU) instrumentation, required by TS Table 3.3.2-1, were not being performed appropriately. Specifically, the RWCU ambient temperature instrumentation and differential temperature instrumentation channel calibrations have not included a sensor calibration as specified in TS Definition 1.4, CHANNEL CALIBRATION.

The RWCU instrumentation was not required to be operable at the time of discovery of the deficient surveillances and no TS Actions were required to be taken. However, this condition has existed since plant startup and TS Actions were not previously implemented as required by Table 3.3.2-1. Therefore, this condition is being reported under the provisions of 10CFR50.73(a)(2)(i)(B).

**SACS Heat Exchanger Inlet Valve Surveillances**

On January 4, 1996, the TSSIP team determined that the Safety Auxiliaries Cooling System (SACS) heat exchanger inlet valves EG-HV-2491 A&B and EG-HV-2494 A&B have not been tested in accordance with the requirements of TS surveillance requirement 4.7.1.1.b.1. This surveillance requirement specifies that at least once per 18 months, during shutdown, these valves actuate to their correct position on the appropriate test signal (i.e., a SACS pump start signal). At 1719 hours on January 4, 1996, the SACS heat exchanger inlet valves were declared inoperable and administratively controlled to ensure performance of the valves safety function until they were satisfactorily tested prior to leaving Operational Condition 4 (Cold Shutdown).

**HPCI Valve Surveillances**

On February 26, 1996, the TSSIP team determined that several High Pressure Coolant Injection (HPCI) system valves have not been periodically tested in accordance with TS surveillance requirement 4.5.1.c.2.b. This surveillance requirement states that, "At least once per 18 months, verify that the suction is automatically transferred from the condensate storage tank to the suppression chamber on a condensate storage tank water level-low signal and on a suppression chamber-water level high signal." Specifically TSSIP determined that: 1) the HPCI system suppression pool suction valve (BJ-HV-F042) has not been verified to open on a suppression chamber-water level high signal; 2) the HPCI system condensate storage tank (CST) suction valve (BJ-HV-F004) has not been verified to close on a suppression



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DESCRIPTION OF OCCURRENCE (Continued)

chamber high water level signal; and 3) the HPCI full flow test line valve (BJ-HV-F011) has not been verified to close on a suppression chamber high water level signal. Since Hope Creek was in an Operational Condition where HPCI was not required to be operable, administrative controls were used until the valves were properly tested in accordance with the TS requirements prior to leaving Operational Condition 4 (Cold Shutdown).

**Primary Containment Penetration Test and Drain Valves**

On March 25, 1996, the TSSIP team determined that certain primary containment penetration test and drain valves were not periodically verified to be closed in accordance with the requirements of TS 4.6.1.1.b. This surveillance requirement states that, "At least once per 31 days (verify) 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..."

Specifically, TSSIP determined that several test and drain valves were omitted from the procedure that verifies primary containment integrity per TS 4.6.1.1.b. The valves were verified to be in their proper closed position and no additional TS actions were warranted. The procedure that verifies primary containment integrity for TS 4.6.1.1.b was revised to incorporate the excluded valves. A review of all primary containment penetrations is on-going to ensure all appropriate TS 4.6.1.1.b components are identified.

**APRM Surveillances**

On March 29, 1996, the TSSIP team determined that the Average Power Range Monitoring (APRM) system has not been appropriately tested in accordance with the Reactor Protection System Instrumentation TS Table 4.3.1.1-1.2.a and the Control Rod Block Instrumentation TS Table 4.3.6-1.2.d. Surveillance requirement 4.3.1.1. states that, "Each reactor protection system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the Operational Conditions and at the frequencies show in Table 4.3.1.1-1." TS Table 4.3.1.1-1.2.a requires that the APRM Upscale, Setdown function undergo a Channel Functional Test once per week and a Channel Calibration once every six months during Operational Conditions 2 through 5 (STARTUP through REFUELING). Surveillance requirement 4.3.6 states that, "Each of the ... control rod block trip systems and instrumentation channels shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the Operational Conditions and at the frequencies shown in Table 4.3.6-1." TS Table 4.3.6-1.2.d requires that the APRM Neutron Flux - Upscale, Startup function undergo a Channel Functional Test quarterly and a Channel Calibration once every six months during Operational Conditions 2 and 5.

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DESCRIPTION OF OCCURRENCE (Continued)

In the review of Hope Creek's implementation of these requirements, TSSIP determined that the Channel Calibrations (which are also credited to meet the Channel Functional Test requirements when they are performed) do not satisfy the requirements for a Channel Calibration or a Channel Functional Test as defined in the TS. Specifically, the surveillance test procedure for the APRM Channel Calibrations specifies the replacement of the K18 relays with test relays (required in order to perform the calibration during Operational Condition 1, POWER OPERATION). The removed K18 relays are re-installed at the conclusion of these tests; however, the K18 relays remain untested upon completion of the APRM Channel Calibration. Since the entire channel is not tested, the APRM Channel Functional Tests and Channel Calibrations have not been performed in accordance with the TS definitions 1.4 and 1.6. Since Hope Creek discovered this deficiency in an Operational Condition (POWER OPERATION) where these APRM functions are not required to be operable, administrative controls were implemented to ensure that this instrumentation is properly tested in accordance with the TS requirements when entering the Operational Conditions where it is required.

RWCU Isolation Actuation Instrumentation Surveillances

On 5/8/96, the TSSIP team confirmed that the Reactor Water Cleanup (RWCU) system has not been appropriately tested in accordance with Isolation Actuation Instrumentation TS Table 4.3.2.1-1.4.a. TS Table 4.3.2.1-1.4.a requires that the RWCU differential flow isolation function undergo a quarterly Channel Functional Test during Operational Conditions 1 through 3 (POWER OPERATION through HOT SHUTDOWN). Specifically, the TSSIP team determined that the loss of power to the K6 relay for the Nuclear Measurement Analysis and Control (NUMAC) leak detection instrumentation has not been tested as required by the TS during the quarterly Channel Functional Tests.

The RWCU is designed such that a loss of power to the leak detection system will cause the respective containment isolation valve to close. The NUMAC leak detection monitor loss of power circuit has been functionally tested as part of the 18 month RWCU Logic System Functional Test (LSFT), which would also satisfy the TS requirement for a Channel Functional Test. The LSFT for this RWCU isolation actuation instrumentation was last completed on 11/9/95 for one division and 4/25/96 for the other division. Therefore, at the time the deficient RWCU Channel Functional Test procedures were identified, one RWCU instrumentation division had exceeded the specified 92 day surveillance interval for the Channel Functional Test and was declared inoperable. As a result, on 5/8/96, at 1158 hours, TS Action Statement 3.3.2.1.b.1.c was entered, which requires the inoperable channel to be placed in the tripped condition (closing the associated RWCU isolation valve) within 24 hours. By 2101 hours on 5/8/96, the inoperable RWCU isolation actuation instrumentation division had been appropriately tested

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DESCRIPTION OF OCCURRENCE (Continued)

and was returned to service. The action statement to close the affected isolation valve was not invoked.

On 5/10/96, the TSSIP team confirmed that the RWCU system has not been appropriately tested at the frequency specified by Isolation Actuation Instrumentation TS Table 4.3.2.1-1.4.e. TS Table 4.3.2.1-1.4.e requires that each channel of the Standby Liquid Control (SLC) system initiation RWCU isolation function undergo a Channel Functional Test during Operational Conditions 1, 2 and 5# (POWER OPERATION, STARTUP and REFUELING when SLC is required to be operable) every other 92 days. Specifically, the TSSIP team determined that the interval between these Channel Functional Tests has exceeded the 92 day frequency required by the TS. At the time this deficiency was discovered, the required Channel Functional Tests had been completed within the previous 92 days for both channels and the current operability of this isolation function was not affected. However, previous testing schedules did not support the required test frequency and therefore were not performed as necessary.

TIP Isolation Actuation Instrumentation Surveillances

On June 24, 1996, the TSSIP team determined that the Primary Containment Isolation due to High Drywell Pressure signal has not been appropriately tested in accordance with Isolation Actuation Instrumentation Table 4.3.2.1-1. TS Table 4.3.2.1-1, item 1.b, requires that the High Drywell Pressure isolation function undergo a quarterly Channel Functional Test during Operational Conditions 1 through 3 (POWER OPERATION through HOT SHUTDOWN). Specifically, the TSSIP team determined that a relay contact, which is part of the channel for the High Drywell Pressure withdrawal signal to the Traversing Incore Probes (TIP), was not being tested at the correct frequency. This function was tested as part of a Channel Calibration on January 25, 1995. However, at the time that the deficient Channel Functional Test procedure was identified, the 92 day surveillance interval had been exceeded. As a result, on June 24, 1996, at 1445 hours, TS Action Statement 3.6.3 was entered. These TS actions were complied with, and, after successfully performing the required surveillance test, the TS Action Statement was exited on June 25, 1996, at 0740 hours.

On June 27, 1996, the TSSIP team determined that the TIP withdrawal function is tested via an LSFT procedure; however, the LSFT does not completely test the TIP response to a primary containment NSSSS isolation signal. Therefore, the surveillance was not being appropriately conducted as required by TS 4.3.2.2. TS 4.3.2.2 requires an LSFT to be performed on an 18 month basis. Specifically, the LSFT did not include the withdrawal function of the TIP probe upon receipt of an isolation signal while the probe was being inserted into the core. As a result, TS Action Statement 3.6.3 was entered, the penetration was isolated, and the TIP system was restricted from use.



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**DESCRIPTION OF OCCURRENCE (Continued)**

On July 17, 1996, after completion of a surveillance on the previously untested function, the TS Action Statement for TIP was exited. On July 18, 1996, Quality Assurance identified a concern relative to the documentation for entering TS Action Statement 3.6.3 in lieu of Action Statement 3.3.2. An investigation into this concern is underway via the Corrective Action Program. The initial determination is that the appropriate TS Action Statement was entered.

On July 19, 1996, Engineering documented a concern that the surveillance test that was conducted on July 17, 1996, and tested the TIP withdrawal logic in the automatic mode, may not have been adequate to address all of the LSFT pathways of the TIP withdrawal logic. As a result, Operations placed TIP in the tripped condition in accordance with TS Action Statement 3.3.2 and a team was formed to investigate the concern. The team determined that the TIP withdrawal logic should be tested in the manual mode to ensure adequate overlap testing. Therefore, the TIP isolation logic was inappropriately considered to be operable from July 17 to July 19, 1996. The surveillance test was revised and the surveillance was completed satisfactorily on July 26, 1996.

**Turbine Stop Valve Closure**

On June 25, 1996, the TSSIP team determined that the Main Turbine Stop Valve Closure annunciation verification was not documented in the quarterly Channel Functional Test; however, it is documented as part of the 18 month Channel Calibration procedure. The Channel Calibration was last performed on March 6 and 7, 1996. At the time that the deficient Channel Functional Test procedure was identified, the 92 day surveillance interval, plus the 25% grace period, had not been exceeded. The required portion of the surveillance was completed prior to the expiration of the grace period. However, this event is being reported due to the lack of documentation of the annunciation for past surveillances.

**Turbine Control Valve Fast Closure**

On July 8, 1996, the TSSIP team determined that the Main Turbine Control Valve Fast Closure Trip Channel was not being tested in accordance with the requirements of TS Table 4.3.1.1-1, Reactor Protection System Instrumentation Surveillance Requirements. This TS Table requires the performance of a quarterly Channel Functional Test and an 18 month Channel Calibration of the Turbine Control Valve Fast Closure function. TS require both of these surveillances to include alarm functions. Contrary to this requirement, the contacts that actuate the Control Room annunciator for the Turbine Control Valve Fast Closure were not verified during the performance of the quarterly Channel Functional Test; however, these contacts are verified as part of the 18 month Channel Calibration procedures. The

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DESCRIPTION OF OCCURRENCE (Continued)

Channel Calibrations were last performed between December 4 and 8, 1995, which exceeds the 92 day surveillance interval plus the 25 % grace period allowed by TS 4.0.2. The most recent quarterly Channel Functional Test was performed on July 7, 1996. Documentation of the alarm function during this Channel Function Test was generated based on operator observation of the required alarm. This event is being reported due to the lack of documentation of the annunciation for previous surveillances.

**Scram Discharge Volume Vent and Drain Valve Reactor Protection System Actuation**

On July 18, 1996, the TSSIP team determined that the Reactor Protection System Instrumentation was not being tested in accordance with the requirements of TS 4.3.1.2. TS 4.3.1.2 requires the performance of an 18 month LSFT. The TS definition of an LSFT states "A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all logic components, i.e., all relays and contacts, all trip units, solid state logic elements, etc., of a logic circuit, from sensor through and including the actuated device, to verify OPERABILITY." Contrary to this requirement, the relays and associated contacts that actuate the Scram Discharge Volume (SDV) vent and drain valves following a scram signal from the Reactor Protection System Instrumentation were not individually verified during the performance of the 18 month Reactor Protection System Simulated Operation procedure; however, post maintenance testing following replacement of the majority of these relays during the last refueling outage tested and verified operability of a portion of the affected relays and associated contacts. As a result, at 1130 hours, TS Action Statement 3.3.1.b was entered and the associated instrumentation for those relays and contacts which were not tested were declared inoperable. In accordance with TS 4.0.3, "the ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours." A temporary procedure to test and verify operability of the untested portions of the SDV vent and drain valve logic was completed satisfactorily at 1910 hours on July 18, 1996. The associated instrumentation was declared operable and the LCO exited. Based upon this finding, it has been determined that the required testing was not performed in accordance with TS. This is reportable in accordance with 10CFR50.73(a)(2)(i)(B), as a condition prohibited by TS.

**Scram Discharge Volume High Level Bypass Function Incomplete Logic System Functional Test:**

On July 25, 1996, the TSSIP team identified to operators that the RPS Scram Discharge Volume (SDV) High Level Bypass function had not been completely tested in accordance with TS 4.3.1.2. This surveillance requirement specifies that "LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months".

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**DESCRIPTION OF OCCURRENCE (Continued)**

Per the HCGS TS definition: "A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all logic components, i.e., all relays and contacts, all trip units, solid state logic elements, etc, of a logic circuit, from sensor through and including the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total system steps such that the entire logic system is tested." The portion of the SDV logic that was not tested were those contacts in the bypass logic that could have inhibited the SDV high level scram function when a bypass signal was not desirable.

This deficiency represents an incomplete LSFT and therefore a non-compliance with TS 4.3.1.2, which constitutes a condition prohibited by TS and is being reported pursuant to 10CFR50.73(a)(2)(i)(B). Upon notification of this deficiency, the SDV High Level trip function was declared inoperable and the provisions of TS 4.0.3. were entered at 1230 on July 25, 1996. Testing was satisfactorily completed at 2244 on July 25, 1996.

**Incomplete 18 Month Visual Inspection of the Reactor Building to Suppression Chamber Vacuum Breaker Assemblies**

On July 26, 1996, the TSSIP team identified to operators that TS Surveillance Requirement 4.6.4.2.b.2.b had not been completely fulfilled. This surveillance requirement states that both reactor building - suppression chamber vacuum breaker assemblies be demonstrated OPERABLE at least once per 18 months by visual inspection. TS 3.6.4.2 defines a vacuum breaker assembly as consisting of a vacuum breaker valve and a butterfly isolation valve. Previous procedures to fulfill this surveillance requirement included a visual inspection of the vacuum breaker valve; but not the inboard butterfly isolation valve. Failure to fulfill this surveillance requirement in the past resulted in a condition prohibited by TS and is being reported pursuant to 10CFR50.73(a)(2)(i)(B). Upon notification of this deficiency, the Reactor Building to Suppression Chamber Vacuum Breaker Assemblies were declared inoperable and the provisions of TS 4.0.3 were entered at 1030 on July 26, 1996. The inspections were completed satisfactorily at 1635 on July 26, 1996.

**ANALYSIS OF OCCURRENCE**

As a Corrective Action from LER 95-017, a Technical Specification Surveillance Improvement Program (TSSIP) had been initiated. The charter of this project is to compare the TS surveillance requirements (with the exception of the Technical Specification 4.0.5 requirements) to the established surveillance procedures to verify that all requirements are met.



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ANALYSIS OF OCCURRENCE (Continued)**Undervoltage Relay Testing and ESF Actuation**

During TSSIP review of TS 3.3.3, "Emergency Core Cooling System Actuation Instrumentation", it was determined that individual contacts, and their configuration, from the undervoltage auxiliary relays and the degraded voltage relays were not tested in accordance with the LSFT requirements of TS 4.3.3.2. These contacts are for the load shedding of major 4.16 kV loads of the vital bus, incoming feeder breaker trips and lock outs, diesel generator start permits, and input to the load sequencer. The LSFT is required to be performed at least once per 18 months.

On November 15, 1995 both the degraded voltage and the bus undervoltage surveillance procedures were revised to incorporate the contacts and wiring that needed to be tested to satisfy the TS surveillance testing.

While testing the 'A' Vital Bus (10A401), a bus transfer occurred when the technician inadvertently touched an adjacent terminal. The bus transfer performed as designed. The 'A' Loss of Offsite Power (LOP) Sequencer initiated per plant design. The affected systems performed as expected. Testing was terminated and subsequently was successfully completed.

**RTD and T/C Channel Calibrations**

In December 1995, the TSSIP reviewed the implementing procedures for surveillance requirements associated with the RWCU system. The suction line (reactor coolant pressure boundary portion) of the RWCU system contains two motor operated isolation valves that automatically close in response to, among other signals, RWCU equipment compartment high ambient temperature and high differential temperature across the RWCU equipment compartment ventilation ducts. The event concerned the channel calibrations performed for these signals.

In the past, channel calibrations for instrument channels having resistance temperature detector (RTD) or thermocouple (T/C) sensors have been completed by performing an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. This test methodology is consistent with standard industry practice and has been considered to satisfy the surveillance requirements.

However, the TSSIP team determined that these surveillance procedures were inconsistent with the literal requirements specified in TS 1.4, CHANNEL CALIBRATION, which requires calibration of the sensor regardless of whether the channel has an RTD or T/C sensor. Unlike other nuclear plant TS, there is no qualifying TS Table notes in the Hope Creek TS to exempt RTDs and T/Cs from the sensor calibration requirements.



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**ANALYSIS OF OCCURRENCE (Continued)**

The qualifying note was added to other plant's TS since calibration of RTDs and T/Cs cannot usually be performed in place. Removal and subsequent re-installation of the sensors introduces a potential for an undetectable failure and alarm considerations that outweighs the benefits of the sensor calibration. In lieu of sensor calibration, an in-place qualitative assessment of sensor behavior is performed. This position was adopted in NUREG-1433, "Improved Standard Technical Specifications for General Electric BWR/4 Plants."

Failure to appropriately perform the surveillances for the RWCU instrumentation requires entry into the TS Action Statement specified in Table 3.3.2-1. Since this did not occur, this event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B).

Additional review performed by the TSSIP identified that this condition exists for all of the RTD and T/C sensors for instrumentation listed in TS Table 4.3.2.1-1, Isolation Actuation Instrumentation Surveillance Requirements, Table 4.3.7.4-1, Remote Shutdown Monitoring Instrumentation Surveillance Requirements and Table 4.3.7.5-1, Accident Monitoring Instrumentation Surveillance Requirements. The affected instrumentation was not required to be operable at the time of discovery of the deficient surveillances and no TS Actions were required to be taken. However, this condition has also existed since plant startup and TS Actions were not previously implemented. This condition is also being reported under the provisions of 10CFR50.73(a)(2)(i)(B).

**SACS Heat Exchanger Inlet Valve Surveillances**

In January 1996, the TSSIP team determined that TS surveillance requirement 4.7.1.1.b.1 has not been performed for the SACS heat exchanger inlet valves. The SACS is designed to provide cooling water to the engineered safety feature equipment, including the residual heat removal heat exchangers, during normal operation, normal plant shutdown, loss of offsite power and loss of coolant accident conditions. Failure to demonstrate that the SACS heat exchanger inlet valve actuates to the open position upon its associated pump start signal at the specified TS frequency and Operational Condition requires entry into the SACS Action Statement for LCO 3.7.1.1, "with both SACS subsystems inoperable, immediately initiate measures to place the unit in at least Hot Shutdown within the next 12 hours." Since this did not occur, this event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B).

**HPCI Valve Surveillances**

On February 26, 1996, TSSIP determined that TS surveillance requirement 4.5.1.c.2.b had not been performed for several HPCI valves. Failure of the

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**ANALYSIS OF OCCURRENCE (Continued)**

surveillance test procedures to require verification of the automatic alignment of the subject HPCI valves has existed since initial plant startup. HPCI is designed to provide make-up during a small break Loss of Coolant Accident (LOCA). HPCI may be used for reactor vessel inventory or pressure control whenever the reactor vessel is pressurized and isolated from the feedwater and/or main steam system. The HPCI pump normally draws water from the CST and discharges to the core spray and feedwater system piping. A full flow test line (back to the CST) is provided on the HPCI pump discharge line to allow testing of the system during normal plant operations without injecting water into the reactor vessel.

Surveillance test procedures have not required verification of the automatic actuation capability of the subject HPCI valves. Failure to perform these surveillances in accordance with the frequency specified in the TS requires actions to be taken to enter at least Hot Shutdown within 12 hours after the allowed outage time expires. Since these actions were not taken, a condition prohibited by the TS occurred, which is reportable under the provisions of 50.73(a)(2)(i)(B).

**Primary Containment Penetration Test and Drain Valves**

On March 26, 1996, TSSIP determined that TS surveillance requirement 4.6.1.1.b had not been performed for several primary containment penetration test and drain valves. Failure of the surveillance test procedure to verify all primary containment penetration valves has existed since initial plant start-up. The test and drain valves in question are closed valves, one inch or less in diameter, with the downstream piping capped closed. Since the surveillance test procedures have not required verification of all the primary containment penetration valves, the missed TS surveillance is reportable under the provisions 10CFR50.73(a)(2)(i)(B).

**APRM Surveillances**

On March 29, 1996, TSSIP determined that Channel Functional Tests and Channel Calibrations for the APRM Reactor Protection System and Control Rod Block Instrumentation functions have not been performed in accordance with the TS definitions 1.4 and 1.6. This condition has existed since initial plant startup whenever an APRM Channel Calibration was performed. The APRMs monitor and record average core power between 0 and 125% of rated power and initiate protective actions should core power exceed specified setpoints. The APRMs provide reference core power signals and rod motion permissive signals to the Rod Block Monitor and the Reactor Manual Control System. They also generate a scram signal in response to average neutron flux increases from abnormal operating transients.

Since the APRMs have not been properly tested, the APRM channels could not be considered operable in Operational Conditions 2 through 5. When the

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ANALYSIS OF OCCURRENCE (Continued)

Reactor Mode Switch has been in the STARTUP, SHUTDOWN or REFUELING positions, it was possible to have an undetected circuit failure where the K18 relay contacts remain closed regardless of Reactor Mode Switch position. In this situation, the APRM setdown setpoints would not be placed in effect; however, the probability of this type of failure occurring is very low since the Reactor Mode Switch contacts and K18 relays have been tested during performance of weekly surveillance testing and the K18 relay contacts open when the relay is de-energized (the fail safe position). With the K18 relay contacts closed, the flow biased trip would be in effect.

During the TSSIP investigation of this issue, deficiencies in the operating procedures were identified relative to scheduling of the APRM Channel Functional Tests. TSSIP determined that Hope Creek does not have sufficient procedural controls in-place to ensure that APRM Channel Functional Tests are completed within seven days prior to entry into other Operational Conditions from Operational Condition 1. This may have resulted in Operational Condition changes (plant scrams in particular) being made without the provisions of TS 3.0.4 and/or 4.0.4 being satisfied for the APRMs. This condition has also been determined to exist for the Intermediate Range Monitors (IRMs) and Source Range Monitors (SRMs). Since Hope Creek discovered this deficiency in an Operational Condition (POWER OPERATION) where the IRM and SRM functions are not required to be operable, guidance was provided to the operators to ensure that this instrumentation is properly tested in accordance with the TS requirements when entering the Operational Condition where it is required. Failure to perform these required surveillances would have required (among other actions) that the Reactor Mode Switch be locked in the Shutdown position within 1 hour after leaving Operational Condition 1. On April 10, 1996, guidance was provided to the operating shift crews to ensure that the appropriate TS actions are taken for this instrumentation until the required surveillances are completed. Subsequent Channel Functional Tests for this instrumentation have demonstrated its operability in Operational Conditions 2 through 5, but may not have been performed within the time specified in the TS relative to Operational Condition changes.

**RWCU Isolation Actuation Instrumentation Surveillances**

On 5/8/96, TSSIP determined that Channel Functional Tests for the RWCU isolation actuation instrumentation had not been performed in accordance with the TS Definition 1.6. In addition, on 5/10/96, TSSIP determined that the Standby Liquid Control (SLC) system initiation RWCU isolation function has not been tested at the frequency specified in the TS. Failure to perform these surveillances in accordance with the TS requires actions to close the affected RWCU isolation valves and declare the RWCU inoperable after the allowed outage time expires. Since these actions were not taken, a condition prohibited by the TS occurred, which is reportable under the



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**ANALYSIS OF OCCURRENCE (Continued)**

provisions of 50.73(a)(2)(i)(B).

**TIP Isolation Actuation Instrumentation Surveillances**

On June 24, 1996, TSSIP determined that the Channel Functional Test for the Primary Containment Isolation due to High Drywell Pressure signal had not been appropriately tested. On June 27, 1996, TSSIP determined that the TIP withdrawal function was not completely tested. In addition, the July 17, 1996, surveillance procedure that was originally used to prove the operability of the TIP isolation function was determined to be inadequate. On July 26, 1996, a revised surveillance procedure was utilized which verified operability of the TIP withdrawal function. Failure to perform these surveillances (2 occasions) in accordance with the TS requires the TIP isolation function to be declared inoperable after the allowed outage time expires. Since these actions were not taken, a condition prohibited by the TS occurred, which is reportable under the provisions of 50.73(a)(2)(i)(B).

**Turbine Stop Valve Closure**

On June 25, 1996, TSSIP determined that the Main Turbine Stop Valve Closure annunciation was not documented in the quarterly Channel Functional Test. The surveillance was not overdue at the time that this discrepancy was discovered. However, this event is being reported due to the lack of documentation of the annunciation for past surveillances.

**Turbine Control Valve Fast Closure**

On July 8, 1996, TSSIP determined that the Main Turbine Control Valve Fast Closure annunciation was not documented for the quarterly Channel Functional Test. Documentation of the alarm function during the most recent Channel Function Test was generated based on operator observation. Therefore, the alarm function is considered to be operable. This issue is being reported under the provisions of 50.73(a)(2)(i)(B) as a condition prohibited by the TS due to the lack of documentation for previous surveillances.

**Scram Discharge Volume Vent and Drain Valve Reactor Protection System Actuation**

On July 18, 1996, TSSIP determined that the LSFTs for the Reactor Protection System Instrumentation functions have not been performed in accordance with the TS definition of an LSFT. The logic for the SDV vent and drain valves contains twenty (20) contacts and four (4) relays. There are four (4) contacts in each of the four (4) Reactor Protection System subsystems arranged in a one-out-of-two-taken-twice logic pattern. Each of the four (4) subsystems actuates a relay, which changes the state of a contact in a one-out-of-two-taken-twice logic pattern that controls the



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**ANALYSIS OF OCCURRENCE (Continued)**

position of the SDV vent and drain valves. The Reactor Protection System Simulated Operation procedure, used to satisfy the requirements of the LSFT, verifies the functionality of the SDV vent and drain valves but did not test each individual relay and contact to verify operability of the redundant logic paths.

The redundant logic paths for the automatic closure of the SDV vent and drain valves in response to a Reactor Protection System Instrumentation scram signal were not adequately tested. This condition has existed since initial plant startup whenever a Reactor Protection System Instrumentation LSFT was performed. Failure to perform these surveillances resulted in a condition prohibited by TS and is being reported pursuant to 10CFR50.73(a)(2)(i)(B).

**Scram Discharge Volume High Level Bypass Function Incomplete Logic System Functional Test**

The HCGS TS definition of an LSFT includes the requirement for testing of all relays and contacts of a logic circuit. For bypass functions, Generic Letter 96-01 and its related workshop summary documents state that contacts in the logic circuit whose failure could affect the safety function are required to be tested. Previously performed SDV High Level Channel Calibration testing ensured that the bypass function was not inhibiting the scram function, but due to the configuration of this logic, credit could not be taken for verifying each of the contacts in the bypass logic.

**Incomplete 18 Month Visual Inspection of the Reactor Building to Suppression Chamber Vacuum Breaker Assemblies**

TS Surveillance Requirement 4.6.4.2.b.2 states that both reactor building-suppression chamber vacuum breaker assemblies be demonstrated OPERABLE at least once per 18 months by visual inspection. TS 3.6.4.2 defines a vacuum breaker assembly as consisting of a vacuum breaker valve and a butterfly isolation valve. Previous procedures to fulfill this surveillance requirement included a visual inspection of the vacuum breaker valve; but not the inboard butterfly isolation valve.

**APPARENT CAUSE OF OCCURRENCE**

The apparent cause of these TSSIP identified missed/deficient surveillance tests is ineffective procedures/inadequate review of the surveillance activities intended to satisfy Hope Creek's TS during the near-term operating license stage in the 1980s.

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**APPARENT CAUSE OF OCCURRENCE (continued)**

The cause of the bus transfer was a test lead coming into contact with a terminal while the technician was attaching test equipment to a relay. Contributing factors were the decision to perform the test while the bus was energized and inadequate job planning in that the effects of conducting the test in an energized cubicle that was not designed for test leads were not completely analyzed.

The apparent cause of inappropriately declaring the TIP isolation logic operable on July 17, 1996, was an inadequate review of the logic diagrams used to generate the surveillance procedure that was written to test the previously untested TIP withdrawal logic. The factors that allowed this inadequate review to occur remain under investigation.

**SAFETY SIGNIFICANCE****Undervoltage Relay Testing**

Although the undervoltage and degraded voltage relays were declared inoperable due to nonperformance of a surveillance requirement, reasonable assurance existed that the Emergency Diesel Generators would start and energize the bus on a loss of power coincident with a Loss of Cooling Accident, and that all required ESF loads would sequence on the vital bus. This assurance is based on previous successful past performances of the integrated Emergency Diesel Generator test. Additionally, performance of testing on the 'A' and 'C' vital busses demonstrated compliance with the LSFT requirements, and showed all required relays and contacts to be operational.

**ESF Actuation During Testing of Undervoltage Relays**

Due to the risks associated with the performance of this surveillance test (i.e., loss of the bus), Operations evaluated each load on the associated bus and provided recommendations regarding the use of redundant equipment to minimize the impact to plant operations. Therefore, the safety significance associated with this event was minimal.

**RTD and T/C Channel Calibrations**

Performance of in-place qualitative assessments of RTD and T/C sensor behavior in lieu of sensor calibrations has been determined to be an acceptable method for demonstrating the operability of the isolation function. This method has been accepted by the NRC and described in NUREG 1433 for this instrumentation. Therefore, there is no safety significance of the failure to perform sensor calibrations as specified in the existing TS Definition 1.4 for the RTD and T/C sensors.

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**SAFETY SIGNIFICANCE (Continued)****SACS Heat Exchanger Inlet Valve Surveillances**

There was minimal safety significance for the inadequate SACS heat exchanger inlet valve surveillance test procedures. The basis for this minimal impact is: 1) the normal position of the heat exchanger inlet valves is open; 2) the SACS operating procedure directs the operator to verify that the valve opens following a pump start; 3) the valves fail as-is, which ensures a suction flow path for pumps previously in service in the event of a design basis accident; and 4) indications available in the control room make the operator aware of a logic malfunction (causing the valve to not open as required), such that compensatory actions can be initiated.

**HPCI Valve Surveillances**

The normal positions for the subject HPCI valves enable HPCI to function upon an initiation signal without these valves changing position. The position of these valves is verified twice daily. The capability for the HPCI system to automatically take suction from the suppression chamber on a suppression chamber-water level high signal has also been demonstrated within the past 18 months. LERs 95-014-00 and 95-020-01 were written to document two ESF actuations where the HPCI suction realigned to the suppression chamber from the CST on a suppression chamber-water level high signal. In addition, surveillance testing satisfying the requirements of TS 4.5.1.c.2.b has been completed and demonstrated the capability of the subject valves to automatically actuate on a suppression chamber-water level high signal. Since the operability of the HPCI system was not affected with the subject valves in an off-normal position, there were no adverse safety consequences associated with this event.

**Primary Containment Penetration Test and Drain Valves**

The normal position for the subject primary containment penetration test and drain valves is the closed position with the downstream piping isolated closed with a secured pipe cap. Positioning of plant components, including valves, is controlled by various administrative means. In this case, the test and drain valves are used as part of leak rate surveillance testing. At the completion of leak rate surveillance testing all repositioned valves are confirmed and independently verified to be left in their proper position. Because this testing is generally the only function of these valves, it is extremely unlikely that the valves would be mispositioned. All the valves have been field verified to be in the correct closed position. Since the valves were verified to be in the correct positions and administrative means were in place to control valve positioning, a past valve mispositioning error is unlikely. Therefore, the safety significance of this event is minimal.

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**SAFETY SIGNIFICANCE (Continued)****APRM Surveillances**

As stated previously, the APRM channels were not previously demonstrated as operable in Operational Conditions 2 through 5. When the plant was in these conditions, it was possible to have an undetected failure where the K18 relay contacts remain closed regardless of Reactor Mode Switch position. In this situation, the APRM setdown setpoints would not be placed in effect; however, the Reactor Mode Switch contacts and K18 relays have been tested during performance of weekly surveillance testing and the K18 relay contacts open when the relay is de-energized (the fail safe position). In addition, the IRMs would have been able to provide signals to the Reactor Manual Control System to block rod motion and to the Reactor Protection System to initiate a scram during postulated conditions. Therefore, the safety significance of this event is minimal.

**RWCU Isolation Actuation Instrumentation Surveillances**

The subject RWCU isolation functions have been tested in accordance with the TS requirements and were found to be operable. Although previous surveillance tests did not appropriately demonstrate operability of the RWCU isolation functions for loss of power to the leakage detection monitor or SLC initiation, the RWCU was capable of being isolated from redundant diverse isolation signals (i.e., reactor vessel low water level and manual initiation). In addition, the successful completion of surveillance tests for these functions has demonstrated the continued capability for the RWCU system to isolate as designed. Therefore, the safety significance of this event is minimal.

**TIP Isolation Actuation Instrumentation Surveillances**

The Primary Containment Isolation and the withdrawal function of the TIP probe due to High Drywell Pressure signals have been tested in accordance with the TS requirements and were found to be operable. Previous surveillance tests did not appropriately demonstrate operability of all TIP isolation functions. The successful completion of the surveillance tests have demonstrated the continued capability for the TIP system to operate as designed. Therefore, there is no safety significance associated with this event.



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**SAFETY SIGNIFICANCE** (Continued)**Turbine Stop Valve Closure Annunciation**

The Turbine Stop Valve Closure Annunciation function has been tested in accordance with the TS requirements and was found to be operable. The successful completion of the surveillance tests for this function has demonstrated the continued capability of the Turbine Stop Valve Closure signal to annunciate as designed. There is no safety significance associated with this event.

**Turbine Control Valve Fast Closure Annunciation**

The Turbine Control Valve Fast Closure Channel Functional Test has been completed in accordance with the TS requirements and was found to be operable. The successful completion of the surveillance tests for this function has demonstrated the continued capability of the Turbine Control Valve Fast Closure signal to annunciate as designed. There is no safety significance associated with this event.

**Scram Discharge Volume Vent and Drain Valve Reactor Protection System Actuation**

The Reactor Protection System Instrumentation LSFT procedure was inadequate in that it did not test each relay and contact associated with the actuation of the SDV vent and drain valves. However, actual performance of the surveillance testing on the untested relays and contacts demonstrated compliance with the LSFT requirements, and proved the required relays and contacts to be operable. Therefore, there was no safety significance to the event.

**Scram Discharge Volume High Level Bypass Function Incomplete Logic System Functional Test:**

The purpose of the SDV Bypass logic is to allow for draining and venting the SDV after a reactor scram. With the reactor mode switch in SHUTDOWN or REFUEL and the bypass switch in BYPASS, the SDV vent and drain valves open providing the draining necessary to reset the scram signal.

When the subject contacts were tested in response to this event, the results were satisfactory. Prior to this event, verification that the SDV high level trip function was not bypassed has been performed by the successful completion of the SDV channel calibration tests, most recently performed between May 1 and May 31, 1996. The channel calibration tests did not include all of the contacts required by the LSFT, but did provide reasonable assurance that the trip function was not bypassed.

There were no potential safety consequences associated with this event.

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SAFETY SIGNIFICANCE (Continued)**Incomplete 18 Month Visual Inspection of the Reactor Building to Suppression Chamber Vacuum Breaker Assemblies**

The butterfly isolation valves function to provide primary containment isolation and operate in conjunction with the vacuum breaker (check) valves to limit containment external to internal differential pressure to within 3.0 psi during post-LOCA containment depressurization.

Subsequent implementation of the Surveillance Requirement for the butterfly isolation valves performed on July 26, 1996, was satisfactory. Additionally, previous successful performance of the remaining surveillance requirements of TS 4.6.4.2.b provided assurance of the ability of the isolation valves to have performed their intended safety functions during previous periods of operation.

There were no potential safety consequences associated with this event.

PREVIOUS OCCURRENCES

Failure to follow TS surveillance requirements has been documented in LERs 95-003-00 and supplements, 95-017-00, 95-034-00 and 95-035-00. LER 95-03-00 documented an event where operators performed a surveillance in an operational condition other than that specified by the TS, LER 95-017-00 documented an event where the emergency bus undervoltage logic circuitry was improperly tested, LER 95-034-00 documented a failure to perform Rod Sequence Control System surveillances when required and LER 95-035-00 documented the failure to perform Reactor Mode Switch, Source Range Monitor and Suppression Chamber Level surveillances properly.

In response to LER 95-017-00, the General Manager - Hope Creek Operations chartered the TSSIP to investigate, define, and resolve weaknesses in the TS Surveillance Program. The events described in this LER were identified as a result of implementation of this corrective action.

CORRECTIVE ACTIONS

The TSSIP review will continue and will be completed by December 31, 1996.

**Undervoltage Relay Testing and ESF Actuation**

The implementing procedures for testing the bus undervoltage auxiliary contacts have been revised to defeat the undervoltage trip function during the performance of the test. The TSSIP group independently reviewed the procedures to ensure satisfactory compliance. This was completed prior to performance of the test procedures.

Logic System Functional Testing was performed on the 'B' and 'D' vital busses to demonstrate operability of the undervoltage and degraded voltage relays to

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**CORRECTIVE ACTIONS (Continued)**

Position papers were prepared to outline the proper test methodology and acceptance criteria for performance of technical specification surveillances, such as LSFT and Channel Functional Test requirements.

Training based on the site approved position papers will be prepared and incorporated into initial and continuing training programs for personnel responsible for the preparation, review, and approval of logic system surveillance procedures. The initial training will be conducted for licensed operators, system managers, procedure writers, and Station Qualified Reviewers, and will be completed by December 31, 1996.

Guidance was provided to the relay and controls technicians regarding the selection and use of M&TE (specifically M&TE with alligator clips).

The Controls Pre-Job Brief Checklist has been revised to ensure the proper use of M&TE.

The procedures used to conduct the LSFT surveillance have been revised to specify the specific alligator clip to be used.

A design change to install test points outside these cubicles will be implemented by the end of the next refueling outage (RFO7).

**RTD and T/C Channel Calibrations**

The TS definition of CHANNEL CALIBRATION was revised, prior to entry into Operational Condition 3 following the sixth refueling outage, to permit in-place qualitative assessments of RTD and T/C sensors.

**SACS Heat Exchanger Inlet Valve Surveillances**

The SACS heat exchanger inlet valves have been administratively controlled to ensure performance of the valves' safety function. These valves were appropriately tested to satisfy the requirements of TS 4.7.1.1.b.1.

Permanent procedure revisions to appropriately test the SACS valves in accordance with the requirements of TS 4.7.1.1.b.1 will be completed prior to the performance of the next scheduled surveillance test during the next refueling outage (RFO7).

**HPCI Valve Surveillances**

The HPCI surveillance test procedure has been revised to appropriately test the subject HPCI valves and ensure operability of HPCI.

The subject HPCI valves have been properly tested and the requirements of TS 4.5.1.c.2.b have been satisfied.

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**CORRECTIVE ACTIONS** (Continued)**Primary Containment Penetration Test and Drain Valves**

The primary containment penetration test and drain valves were added to the surveillance procedure that verifies TS 4.6.1.1.b.

A review of all primary containment penetrations is on-going to ensure all appropriate TS 4.6.1.1.b components are identified. This review will be completed by August 31, 1996.

**APRM Surveillances**

Administrative controls were placed in effect for the APRMs on March 29, 1996, to ensure that the instrumentation is appropriately tested prior to entering an Operational Condition where it is required.

On April 10, 1996, guidance was provided to operating shift crews to ensure that the appropriate TS actions are taken for the APRM, IRM and SRM instrumentation until the required surveillances are completed.

Surveillance test procedures for the quarterly and semi-annual APRM Channel Calibrations have been revised to ensure that they are performed in accordance with the TS definitions.

Operations procedures have been revised to incorporate the April 10, 1996, guidance on the performance of APRM, SRM and IRM surveillances.

**RWCU Isolation Actuation Instrumentation Surveillances**

RWCU isolation actuation instrumentation Channel Function Test procedure revisions, which appropriately test RWCU isolation functions, have been completed.

Recurring tasks have been revised to ensure that the RWCU isolation actuation instrumentation is tested at the frequency specified in the TS.

**TIP Isolation Actuation Instrumentation Surveillances**

The portions of the Channel Functional Tests for the Primary Containment Isolation due to High Drywell Pressure that had not been performed at the correct frequency were completed satisfactorily.

The Functional Test procedure for the Primary Containment Isolation due to High Drywell Pressure signal has been revised.

The surveillance procedure for the TIP probe withdrawal was revised.



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**CORRECTIVE ACTIONS** (Continued)

The LSFT for the TIP probe withdrawal function was performed satisfactorily on July 26, 1996.

The factors that allowed the inadequate review of the logic diagrams used to generate the TIP withdrawal surveillance procedure remain under investigation. The appropriate corrective actions will be included in a future supplement to this LER.

**Turbine Stop Valve Closure**

The surveillance tests for the contacts were completed satisfactorily.

The Channel Functional Test procedure has been revised.

**Turbine Control Valve Fast Closure**

The Channel Functional Test was completed satisfactorily on July 7, 1996.

The Channel Functional Test procedure was revised on July 31, 1996.

**Scram Discharge Volume Vent and Drain Valve Reactor Protection System Actuation**

Satisfactory testing of the untested SDV vent and drain valve relays and associated contacts was completed on July 18, 1996.

The Reactor Protection System Instrumentation Simulated Operation procedure will be revised by June 1, 1997 to meet the requirement of surveillance requirement 4.3.1.2.

**Scram Discharge Volume High Level Bypass Function Incomplete Logic System Functional Test:**

The untested portions of the SDV Bypass logic were tested satisfactorily on July 25, 1996.

Surveillance test procedure HC.OP-ST.SF-0001(Q) will be revised to include testing of the previously omitted portions of the SDV Bypass logic. This procedure revision will be implemented by June 19, 1997.

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TEXT CONTINUATION

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CORRECTIVE ACTIONS (Continued)

**Incomplete 18 Month Visual Inspection of the Reactor Building to  
Suppression Chamber Vacuum Breaker Assemblies**

The required visual inspections were satisfactorily completed on July 26, 1996.

Hope Creek procedure HC.MD-ST.GS-0002(Q) has been revised to include the visual inspection requirements for butterfly isolation valves 1GSHV-5029 and 1GSHV-5031 per TS Surveillance Requirement 4.6.4.2.b.2.b.