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Electric and Gas
Company

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February 12, 1986

Dr. Thomas E. Murley, Administrator
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Dr. Murley:

NRC INSPECTION #85-65
ITEM OF NONCOMPLIANCE
HOPE CREEK GENERATING STATION

Please find below our response to the item of noncompliance cited at the January 3, 1986, exit interview for NRC Inspection No. 85-65.

According to 10CFR50 Appendix J, Section III, Leakage Testing Requirements, Part A(b), closure of containment isolation valves for Type A test shall be accomplished by normal operation and without any preliminary exercising or adjustments (e.g., no tightening of valves after closure by valve motor). In addition, Step 7.1.3 of Section 7.0, Special Precaution and Notes of PSSUG-PTP-GP-1, "Integrated Leak Rate Test" states, "All containment valves shall be positioned by their normal means, no torquing of handwheels or exercising of the valve shall be permitted".

Contrary to the above, upon completion of the preoperational Integrated Leak Rate Test (ILRT), the Limitorque operator for containment isolation valve KL-HV-5148(V-001) was found with its declutch lever in the engaged position, indicating that the valve may have been hand-tightened.

Corrective Steps Taken and Results Achieved

Given the importance of the ILRT and the company's strict position regarding compliance with safety tagging rules, the decision was made to use red blocking tags under the Station Safety Tagging Procedure for the ILRT valve lineup rather than the standard orange T-mod tags.

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However, subsequent to the Structural Integrity Test and prior to initiation of the ILRT, PSE&G QA surveillance identified outboard containment isolation valve BE-HV-F015A(V-025) as having its declutch lever engaged. The ILRT was postponed pending completion of inspection of all motor operated containment isolation valves outside the containment. Fourteen additional valves were found with their declutch levers engaged. All fifteen motor operated valves were electrically restroked reestablishing the requisite test conditions.

Immediately following the ILRT, a team of personnel from Operations, QA/QC and the ILRT Group conducted a walkdown of the sixteen motor operated isolation valves inside the containment. During this walkdown, the discrepant condition of valve KL-HV-5148(V-001) was identified.

On-the-Spot Change No. 28 to preoperational test procedure PTP-GP-1 was issued providing a leakage penalty of 97 SCCM (measured leak rate through the valve) to be added to the integrated test results.

Startup Deficiency Report (SDR) No. KL-0288 was initiated to address the potential for malfunction of motor operated valve KL-HV-5148(V-001). Subsequent investigation verified the declutch adjustment as correct and no malfunction was observed during repeated cycling of the motor operated valve.

Investigation

Our investigation revealed that in the process of tagging out a motor operated valve (MOV), the equipment operator normally engages the clutch and tries to rotate the handwheel in the closed direction to ensure that the valve is safely seated, thereby protecting personnel. Manually verifying closure of a MOV during a tagout is not prohibited by existing station procedures.

Therefore, we conclude that during the valve lineup activities for the ILRT, the operating shift personnel were not properly advised of the requirements of PTP-GP-1 and Appendix J. Station supervisory personnel failed to ensure that all shift operators clearly understood the change to the normal tagout procedure.

A review of the tagging request forms prepared for the ILRT valve lineup indicated no precautionary instructions had been entered in the Special Instructions portion of the forms.

We conclude that the personnel responsible for preparing the ILRT tagging requests were unaware of Operation's standard practice of verifying closure when tagging out MOV's.

These valves are designed to be operated manually or electrically. Engagement of the clutch into the manual mode disengages the electric drive mechanism. Electrical actuation of the valve automatically reengages the electric drive. Remote set capability of the valve is unaffected whether the valve was last actuated manually or electrically. Therefore, manual verification of closure has no adverse impact on MOV operability.

Corrective Steps Taken to Preclude Recurrence

All Operations personnel will be briefed on the contents of this violation and our response.

Operating procedure OP-AP.ZZ-109(Q), "Equipment Operational Control", has been revised incorporating the requirement that manual torquing of motor operated valves is not permitted when performing ILRT lineups.

In addition, on January 18, 1986, a Procedure Revision Request was initiated to incorporate the same requirement into the next revision of the Hope Creek Station Safety Tagging Procedure SA-AP.ZZ-015(Q).

A test precaution will also be incorporated into the inservice Type A test procedure M9-ILP-301 stating, in part, "Power actuated containment isolation valves shall not be manually operated."

Date of Full Compliance

All Operations personnel will have been briefed by February 21, 1986.

Revision 1 to OP-AP.ZZ-109(Q) was approved on January 22, 1986.

Sincerely,



Dr. T. E. Murley

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