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Nuclear Business Unit

**JUL 14 2000**

LR-N000259

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

**FOLLOW-UP REPLY TO NOTICE OF VIOLATION  
INSPECTION REPORT 05000272/1999010 & 05000311/1999010  
SALEM GENERATING STATION NOS. 1 AND 2  
FACILITY OPERATING LICENSES DPR-70, AND DPR-75  
DOCKET NOS. 50-272 AND 50-311**

Gentlemen:

On March 15, 2000, Public Service Electric and Gas (PSE&G) provided a reply to the Notice of Violation issued on February 14, 2000, in Salem Inspection Report 05000272 & 05000311/1999010 (IR 99-10). In this reply, PSE&G informed the NRC that an assessment is being performed to determine the necessary changes to the fire protection systems in the 4160 Vac switchgear rooms to address the overall fire risk of these rooms.

In IR 99-10, PSE&G was cited with the following violation:

“License Condition 2.C.10 for Unit 2 requires PSEG to maintain in effect all provisions of the approved fire protection program, as described in the Safety Evaluation Report issued November 20, 1979, and subsequent safety evaluation reports. Section II.C of the November 20, 1979, Safety Evaluation Report states that the carbon dioxide gaseous suppression systems will be designed in accordance with NFPA Standards Numbers 12 and 12A.

National Fire Protection Association Standard on Carbon Dioxide Extinguishing Systems (NFPA 12), Section 2-4, Carbon Dioxide Requirements for Deep-seated Fires, specifies a fifty percent concentration of carbon dioxide for dry electrical wiring insulation hazards in general.

Contrary to the above, when tested in February 1979, the Unit 2 4160 Vac switchgear room total flooding carbon dioxide fire suppression system did not achieve a fifty percent concentration. This condition had not been corrected as of the date of the inspection in November 1999.”

*TEO*

In IR 99-10, the NRC reviewed this condition using the Fire Protection Significance Determination Process (SDP). Under the SDP process, the carbon dioxide system concentration currently achieved was determined to not influence the risk categorization of the fire area; however, the overall finding was classified in the white band (increased regulatory response) of the Revised Regulatory Oversight Process (RROP). As described in IR 99-10, the two factors that placed the finding in the white band were; 1) electrical raceway fire barrier systems do not meet the 1-hour requirements, and 2) the 4160 volt switchgear room is protected by a manually actuated carbon dioxide suppression system.

Open issues associated with the electrical raceway fire barrier systems (ERFBS) were previously identified and addressed in letter LR-N97357, dated June 6, 1997. As stated in this letter PSE&G is resolving these deficiencies. The ERFBS resolution plan will resolve the issues concerning the ERFBS in the 4160 volt switchgear rooms (see factor #1 above). Completion of the ERFBS resolution plan is currently scheduled for November 2002.

As a part of the ERFBS resolution plan, PSE&G volunteered to pilot the draft National Fire Protection Association (NFPA) 805 consensus standard for a risk informed/performance based fire protection program. The tools of NFPA 805 and other risk tools have been used to initiate an assessment of the 4160 volt switchgear rooms. Based on preliminary results of this assessment, PSE&G has determined that risk reduction can be achieved through the installation of an automatic water suppression system in this area. This modification will be used to address factor #2 above. Installation of the automatic water suppression in the 4160 volt switchgear room will be completed by November 2002.

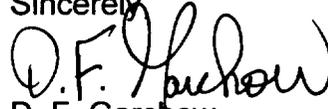
As the NFPA-805 review progresses, PSE&G will assess changes to the carbon dioxide system in the 4160 volt switchgear room taking into account the other planned fire protection improvements discussed above. Based on this review, PSE&G will implement changes to the Salem Fire Protection Program licensing basis as appropriate.

As described in the March 15, 2000 violation response, appropriate compensatory actions are in place which ensure that the current fire protection features in the 4160 volt switchgear room are capable of detecting and extinguishing a fire in this area and protect components necessary to safely shutdown the plant.

JUL 14 2000

If you have questions regarding the information in this submittal, please contact Brian Thomas at 856-339-2022.

Sincerely,



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