

JAN 03 2000

LRN-01-0002



United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

**RESPONSE TO NON-CITED VIOLATION (NCV) 50-354/2000-10-01
HOPE CREEK GENERATING STATION UNIT NO. 1
DOCKET NO. 50-354**

Gentlemen:

On December 6, 2000, the NRC issued Inspection Report 50-354/2000-10, identifying Non-Cited Violation (NCV) 50-354/2000-10-01 for failure to comply with the requirements of Technical Specification License Condition 2.C.7 and the Fire Protection Program. Attached, please find the PSEG - Nuclear response to this non-cited violation. While PSEG agrees that a violation occurred, we do not agree that the violation was of Technical Specification License Condition 2.C.7 or the Fire Protection Program. The response discusses the bases for our conclusions.

If you have any questions regarding the information in this submittal, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "D.F. Garchow".

D. F. Garchow
Vice President - Operations

Attachment

IE01

C Mr. Hubert J. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. R. Ennis, Licensing Project Manager - Salem
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 8B1
Rockville, MD 20852

Mr. J. Schoppy (X24)
USNRC Senior Resident Inspector

Mr. K. Tosch, Manager, IV
Bureau of Nuclear Engineering
P. O. Box 415
Trenton, NJ 08625

ATTACHMENT

REPLY TO A NON-CITED VIOLATION
HOPE CREEK GENERATING STATION UNIT 1
DOCKET NO. 50-354

REPLY TO THE NON-CITED VIOLATION

1. Description of the Non-Cited Violation

The inspectors identified a non-cited violation for failure to properly implement fire protection program requirements for inoperable fire doors, in that the fire doors for three adjacent emergency diesel generator (EDG) rooms were allowed to be left open simultaneously for modifications without increasing the fire protection compensatory measures to the procedurally specified continuous fire watch.

The safety significance of this finding was very low because of the availability of detection, the low combustible loading in the area, and the relative short duration of the condition (ten hours over five days).

2. Response to the Non-Cited Violation

PSEG also believes that a violation of Technical Specification requirements occurred; however, the violation was of Technical Specification 6.8.1, failure to follow Technical Specification required procedures and not of License Condition 2.C.7 or the Fire Protection Program. Specifically, the requirements of procedure NC.NA-AP.ZZ-0008(Q), Control of Design and Configuration Change, Tests and Experiments, which requires design change packages to be installed in accordance with the instructions contained in the change package, were not met.

i. Description of the Event

Design Change Package (DCP) 80009844, which implemented the replacement of the fire doors in the EDG bays at Hope Creek, was scheduled to replace only one door at a time. In fact, only one door was replaced at a time, but the painting activities were performed such that three doors were open at one time on the front side and then three doors on the rear side, prior to the completion of all work associated with the DCP. This represents a violation of Technical Specification required procedures. The DCP was scheduled in accordance with a statement in the Fire Protection Specialty Review Checklist, which specified that only one room would be affected at a time. This statement was not included in the installation instructions. As a result, the personnel involved in the painting activities were not aware of this statement.

License condition 2.C.7 requires compliance with the Hope Creek Fire Protection (FP) Program. The compensatory actions required by the FP program are defined by procedure HC.FP-AP.ZZ-0004(Q), Actions For Inoperable Fire Protection. Specifically,

Attachment 1, Actions Criteria, and Attachment 2, Fire Suppression Systems Impairment Report, allow the selection of the appropriate compensatory measures, based on the criteria as defined in the attachments. For the cited condition, the attachments require the establishment of an hourly fire watch and verification of the operability of the backup fire suppression. These steps were taken; therefore, compliance with the FP Program was achieved.

The attachments require a continuous fire watch when the fire suppression system is inoperable in an area in which redundant systems or components could be damaged. In this case, none of the individual areas that were affected contained redundant systems or components; therefore, the appropriate action was to conduct hourly fire watches in each of the three affected areas.

ii. Reason for the Violation

The original schedule that was developed addressed the statement that only one EDG room would be affected at a time. However, this requirement was not carried over to the installation instructions. Therefore, when the schedule was changed to allow painting to take place later, the personnel involved in the painting were not aware of this statement.

iii. Corrective Steps That Have Been Taken and Results Achieved

The B, C, and D EDG room doors were closed.

iv. Additional Corrective Steps That Will be Taken

The Fire Protection program will be enhanced to address the aggregate impact of multiple impairments by July 10, 2001.

v. Date When Full Compliance Will Be Achieved

Compliance for the originating event was achieved when the doors to the B, C, and D EDG room doors were closed.