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April 2, 1981

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pa. 19406

Attention: Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch

Gentlemen:

COMBINED NRC INSPECTION 50-272/81-01 AND 50-311/81-01
SALEM GENERATING STATION
UNIT NO. 1
JANUARY 1 THRU 31, 1981

We have reviewed the report of your inspection conducted by Mr. L. J. Norrholm during the period January 1 thru January 31, 1981. Our response to the items of noncompliance identified in Appendix A is as follows:

ITEMS OF VIOLATION

Item A

Technical Specification 4.5.2.g states: "Each ECCS subsystem shall be demonstrated OPERABLE by verifying the correct position of each of the following ECCS throttle valves; 1. Within four hours following completion of each valve stroking operation or maintenance on the valve when the ECCS subsystems are required to be OPERABLE..."

HPSI SYSTEM
VALVE NUMBER

11 SJ 16
12 SJ 16
13 SJ 16
14 SJ 16

LPSI SYSTEM
VALVE NUMBER

11 SJ 138
12 SJ 138
13 SJ 138
14 SJ 138
11 SJ 143
12 SJ 143
13 SJ 143
14 SJ 143

April 2, 1981

Contrary to the above, at least three of the above throttle valves were repacked and stroked during the Fall 1980 outage (11 SJ 138, 13 SJ 143, and 14 SJ 143) and no evidence of position verification could be identified. When verified on January 19, 1981, when the ECCS subsystems were required to be OPERABLE, four of the twelve throttle valves were found in the wrong position.

Reply To Item A

1. The identified valves were placed in their proper position.
2. Maintenance and Operations personnel responsible for follow-up/retest requirements have been instructed of the importance for each retest requirement that has been established. On-the-spot changes have been made to the appropriate procedures to insure that all of the throttle valves in this system are returned to the required positions following any evolution requiring valve position changes.

A safety evaluation was performed and the unit was determined to be in a safe condition during this occurrence. The results of this safety evaluation can be found in LER 81-07/01X-1.

3. We are in compliance now.

Item B

Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented and maintained covering... the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972." Regulatory Guide 1.33 includes Paragraph A.8 Log Entries. An implementing procedure, Operations Directives Manual, Revision 6, states, in Section 3.3 "Operations Log No. 1 - Control Room Daily Log...3) Entries to the narrative portion shall include but not be limited to:...j) Implementation and termination of Technical Specification Action Statement."

Contrary to the above, the following failures to log and acknowledge entry into an Action Statement were identified.

- 1) On January 7 and 8, 1981, Secondary Plant Log readings recorded Number 1 Fire Pump Day Tank level as less than that required by Technical Specification 4.7.10.1.2. No corrective action or acknowledgement of an Action Statement was identified. Tank level was restored within the time limits dictated by Technical Specifications.

April 2, 1981

- 2) On January 20, 1981, Auxiliary Feedwater Storage Tank level was noted as 86%; which is less than the 94% specified by Technical Specification 3.7.1.3. No corrective action had been initiated or acknowledgement of the Action Statement made. The tank was refilled within the time limits dictated by Technical Specifications.
- 3) on January 27, 1981, Pressurizer Overpressure Protection Channel 2 on Unit 2 was not in service. No reason or acknowledgement of failure to have two POPS channels in service as required by Technical Specification 3.4.9.3 was identified. The channel was restored to service within the time limits specified in the Action Statement.

Reply To Item B

1. Although no Action Statement was initiated for each item the appropriate required corrective action was completed within the allotted time limits. The noted items have been addressed in a Licensee Event Report (LER 81-32/03L).
2. The Operations personnel will receive a formal training session which addresses the importance of accurate and timely documentation of operation events in the Operations Log.
3. This training will be completed in the next operator requalification training cycle which is scheduled to begin in September 1981.

Item C

Title 10 Code of Federal Regulation Part 19.11 requires the Licensee to post current copies of any notice of violation involving radiological working conditions and any response from the licensee.

Contrary to the above, on January 19, 1981, the licensee had not posted a notice of violation involving radiological working conditions transmitted in correspondence dated December 8, 1980 and to which the licensee responded by correspondence dated December 19, 1980.

Reply To Item C

1. When the requirement was brought to the attention of the station staff the notice of violation was posted and a review of 10CFR19.11 was completed.

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-4-

April 2, 1981

2. The Administrative Procedure, AP-16, which provides these guidelines will be revised to ensure a more positive control.
3. We are in compliance now.

Sincerely,



CC Director, Office of Inspection and Enforcement
Nuclear Regulatory Commission
Washington, DC 20555

