

Public Service
Electric and Gas
Company

Richard A. Uderitz
Vice President
Nuclear

80 Park Plaza, Newark, NJ 07101 201-430-7380 Mailing Address: P.O. Box 570, Newark, NJ 07101

March 4, 1982

Mr. Ronald C. Haynes, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Attention: Mr. Richard W. Starostecki, Director
Division of Resident and Project Inspection

Gentlemen:

NRC COMBINED INSPECTION 50-272/81-29 AND 50-311/81-29
SALEM GENERATING STATION
UNITS NO. 1 AND 2
NOVEMBER 24 THRU DECEMBER 31, 1981

We have reviewed the items of violation which were identified in the inspection conducted on November 24 - December 31, 1981 and described in Appendix A of your letter dated February 2, 1982. The following are our responses to the identified items:

ITEMS OF VIOLATION

Item A

10CFR 50.59 authorizes changes in the facility and procedures provided these changes do not constitute an unreviewed safety question. 10CFR 50.59 further requires that the licensee maintain on record a written safety evaluation which provided the basis for this determination.

Contrary to the above,

- (1) On several occasions during 1981, the licensee repaired leaking tubes in the Containment Fan Coil Units by applying a metal epoxy filler compound to the leak area. No safety evaluation was made to provide a basis for acceptability of this repair. The FSAR describes copper-nickel fan coil tubes.

3/4/82

- (2) On November 19, 1981, the licensee declared CFCU 22 operable with a known 0.5 gpm service water leak from the motor cooler. No written safety evaluation was made to provide a basis for this determination. The FSAR describes the cooling coil tubes as completely closed within the containment.

Item B

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained for surveillance activities and for those activities listed in Appendix A to Regulatory Guide 1.33.

Contrary to the above,

- (1) On December 14, 1981, surveillance procedure SP(0) 4.6.2.2.(b) Containment Systems - Spray Additive Unit No. 2 was found inadequate, in that it did not reflect the upper limits of level and NaOH concentration dictated by Technical Specification 3.6.2.2.
- (2) On December 13, 1981, a technician failed to follow procedure PD3.6.014, Ion Exchange Resin Refilling, in that the resin fill valve was not closed prior to placing Deborating Demineralizer 11 in service. This procedure is required by Regulatory Guide 1.33.
- (3) As of December 31, 1981, the licensee has not provided an emergency instruction for loss of pressure control, specifically, loss of pressurizer heaters. Such procedure is required by Regulatory Guide 1.33.

Reply to Item A (1)

1. A Safety Evaluation (S-C-G210-MSE-130-RO) was performed and approved on February 12, 1982 for utilization of Belzona metal filler to repair leaks in the Containment Fan Coil Unit (CFCU) cooler tubes.
2. Belzona super metal was approved for application to wetted and non-wetted surfaces of Nuclear Grade 1, 2 and 3 pressure boundary components.
3. We are now in compliance.

3/4/82

Reply to Item A (2)

1. A Safety Evaluation (S-1-M600-MSE-133-RO) was performed and approved on February 24, 1982 for continued operation with a small service water leak in the Containment Fan Coil Unit cooling system.
2. Under normal system operating conditions no radioactivity would be released to the environment in the event of an accident due to the Service Water System pressure being higher than the containment design pressure. An overall study which considers abnormal or degraded system operating conditions is in progress. As a result of this study, it is expected recommendations will be issued by March 22, 1982 for operating procedure modifications to address those conditions where CFCU leaks are identified.
3. A Field Directive will be issued by March 22, 1982, recommending operating procedure modifications for those conditions where Fan Coil Unit leaks are identified.

Reply to Item B (1)

1. Even though the surveillance procedure acceptance criteria did not indicate that the upper NaOH concentration limit was equal to or less than 32%, the actual concentration was within the required limits of equal to or greater than 30% and equal to or less than 32% L.C.O. 3.6.2.2 also required the tank volume to be greater than 2568 gals. but less than 4000 gals. The SP(O) stated the limit to be greater than 2000 gals., however, the actual volume was within the required limits of the L.C.O.
2. Apparently, the oversight of the acceptance values was made when the procedure was originally prepared. Presently, the contents of the Station Plant Manual are undergoing the required two year review and all the Surveillance Procedure acceptance criteria are being checked against the applicable Technical Specification requirements.
3. The date on which the procedural inadequacy was found was December 4, 1981.
4. On December 4, 1981 an "On-the-Spot Change" was issued and implemented to correct the discrepancy between the SP(O) and the Technical Specifications.
5. We are now in full compliance.

Mr. Ronald C. Haynes, Director
U.S. Nuclear Regulatory Commission

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3/4/82

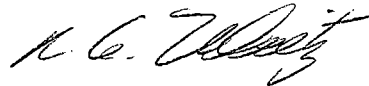
Reply to Item B (2)

1. All procedures dealing with primary system additions were revised on February 17 to include a two technician addition team. One technician will perform the procedure while the other ensures each step of the procedure is followed in sequence. The affected procedures were PD-3.6.001, PD-3.6.002 and PD-3.6.014.
2. We are now in full compliance.

Reply to Item B (3)

1. At the present time, the Emergency Instruction procedures are being revised and when completed and approved, will include the required information.
2. Target date for full compliance is March 15, 1982.

Very truly yours,



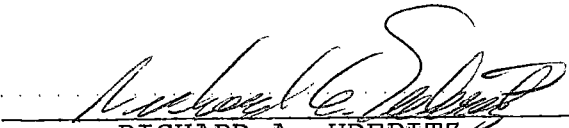
CC Director, Office of Inspection and Enforcement
Nuclear Regulatory Commission
Washington, D.C. 20555

STATE OF NEW JERSEY)
)
COUNTY OF ESSEX)

SS: COUNTY OF ESSEX

RICHARD A. UDERITZ, being duly sworn according to law deposes
and says:

I am a Vice President of Public Service Electric and Gas Company,
and as such, I find the matters set forth in our response dated
March 4, 1982, to the NRC's combined inspection report
50-272/81-29 and 50-311/81-29 are true to the best of my knowledge,
information and belief.


RICHARD A. UDERITZ

Subscribed and sworn to before me
this 4TH day of MARCH, 1982


Notary Public of New Jersey

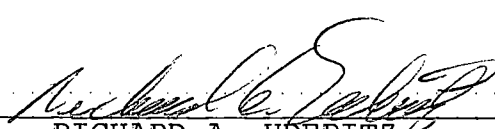
My Commission expires on _____
RUDOLPH L. von FISCHER JR.
Notary Public of New Jersey
My Commission Expires Sept. 10, 1986

STATE OF NEW JERSEY)
COUNTY OF ESSEX)

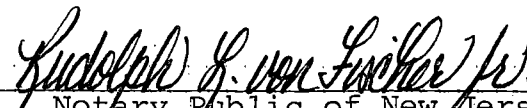
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