

Richard A. Uderitz  
Vice President -  
Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 935-6010

March 18, 1983

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Mr. Richard W. Starostecki, Director  
Division of Project and Resident Program  
Region 1  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Starostecki:

ADDITIONAL INFORMATION  
CORRECTIVE ACTION PROGRAM RELATED TO  
REACTOR TRIP BREAKER FAILURES  
NO. 1 UNIT  
SALEM GENERATING STATION  
DOCKET NO. 50-272

The following additional information is provided to complement discussion of the overall management capability and performance issue provided in our previous submittals of March 1, 8, 14 and 15, 1983.

Overall Management Capability and Performance

As a result of the experiences gained with the operation and technical support of the Salem units and PSE&G's continuing desire to improve the effectiveness and efficiency of these functions, a review of the structure and capability of our nuclear operations and support organizations was performed in early 1981. Considered in detail during this review were the many requirements and recommendations resulting from the post-TMI assessment of the nuclear industry, as well as specific observations made by the NRC, INPO and PSE&G of our capabilities to efficiently support the operation of our nuclear units. In October 1981, PSE&G embarked on a major organizational change by combining its nuclear operations and support functions into a centralized, integrated Nuclear Department to be located on Artificial Island, the site of Salem Generating Station and Hope Creek Generating Station. In addition to improving the dedication

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and responsiveness of support personnel to plant operations, the formation of the Nuclear Department also enhances our state of emergency preparedness with respect to technical and administrative support.

One of the more significant aspects of this organizational change is that it relieves station management of certain non-operating responsibilities as plant operating and support functions are combined into a single, centralized integrated structure. Under the direction of the Vice President - Nuclear as the senior nuclear manager, responsibility for safe and efficient operation of our nuclear facilities has been clearly assigned. Additionally, the organizational structure and location provides for unambiguous management authority and effective lines of communication between responsible groups involved in the operations, technical and administrative support of our nuclear units.

In order to provide additional information on actions taken or planned to improve management performance and effectiveness, selected items which have not been previously described are summarized below:

1. Nuclear Review Board

The Nuclear Review Board had performed studies to improve its effectiveness in meeting its responsibilities. As part of this review, discussions were held with several utilities regarding organization and conduct of operation of their respective off-site review committees. The Chairman and selected members of PSE&G's NRB attended meetings of similar committees of other utilities. Pursuant to the recommendations made by the NRB and the organization establishing the Nuclear Department, the office of the NRB was established on-site with a full-time staff consisting of the chairman and a technical secretary to the Board. In January 1983, the membership was reconstituted with a provision for participation by persons from outside organizations in order to enhance the independence of NRB and to benefit from their experience. In February 1983, we requested a neighboring utility to consider exchanging members on each other's review board. Our efforts to improve the effectiveness continue through attending other utilities' off-site review committee meetings and monitoring their experience in this area.

## 2. Station Operations Review Committee

To provide independence and enhance the effectiveness of the Station Operations Review Committee (SORC), a member of the Independent Safety Engineering Group (Safety Review Group) will be assigned to serve on this Committee.

## 3. Nuclear Assurance and Regulation Department

Upper management's access to independent evaluations of safety, quality, regulatory compliance and reliability was further enhanced in January 1983 by the establishment of an independent major department reporting to the Senior Vice President Energy Supply and Engineering. A General Manager - Nuclear Assurance and Regulation has been designated to provide management with an independent basis for evaluating the effectiveness of nuclear safety and quality programs.

## 4. Self-Evaluation Programs

With the formation of the Nuclear Department in 1981, an effort to self-evaluate the Department's performance was initiated. As a follow-up to the initial INPO evaluation of Salem in June 1981, specific recommendations made by INPO were reviewed by a PSE&G management team to determine the degree of implementation. Similarly, the recommended actions of the 1982 INPO evaluation are being tracked for resolution. PSE&G is planning additional evaluation programs to improve our management performance as follows:

- ° INPO Assist Visits will be utilized to help in resolving those specific management concerns identified by our various programs.
- ° PSE&G management personnel will participate in plant and corporate evaluations of other utilities by INPO in order to gain additional input.
- ° Suggestions and recommendations from our NSSS vendor, based upon their observations and experience, will be solicited and evaluated to improve our programs and policies.

- ° Plant visits will continue to be arranged where common problems and concerns have been identified. Appropriate utility personnel can thereby share experiences and discuss corrective actions.

With the knowledge gained from the actions identified above and review of other in-house studies, specific recommendations can be made for management action.

#### 5. Independent Assessment of QA Program

As part of PSE&G's plan to consolidate functions and resources for its operating nuclear plants into one organization at the site, the responsibility for the Operational QA Program was transferred to the Nuclear Department in early January 1983. In February, the Vice President - Nuclear requested a proposal from a consultant to perform an independent assessment of this new organization's program. The assessment will consist of a review of (1) the QA organizational structure and staffing, (2) the QA program content and procedures, and (3) the effectiveness of implementation of those programs and procedures. The findings and recommendations resulting from this assessment will be evaluated by PSE&G and an action plan will be prepared to improve the Nuclear Operations QA performance, as necessary.

It is planned to complete the review and have the action plan prepared by July 1, 1983.

#### 6. Nuclear Training Program

Continued recognition by the Company of the value of training, coupled with our operational experience and increased training requirements led to a formal review of training and the development of a master plan in 1979.

This plan established a Nuclear Training Center which went into operation in August 1982. In addition to shops and labs supporting all job classifications, a replica control room and plant simulator will be in full operation by early summer of 1983. The Center has five major training departments and a staff of approximately 100.

Thirty courses have been evaluated by the regionally accredited New York State Program of Non-Collegiate Sponsored Education.

Credit recommendations have been granted for these courses. Additional courses will be reviewed in May and November of 1983. The Company has applied to INPO to have its training programs reviewed for accreditation and expects the INPO Accreditation Team will make its site visit this spring. PSE&G will be one of the first utilities to be prepared for an INPO accreditation visit.

Programs presented or under development are designed to support all Nuclear Department personnel, including Helper through Technician in the Bargaining Unit, and first line supervisor through senior management in the management staff. Efforts in nuclear training are the direct result of the Company's initiative and reflect management's dedication to training.

Sincerely,



CC Mr. Darrell G. Eisenhut  
Director, Division of Licensing  
U. S. Nuclear Regulatory Commission

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