



PSEG

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038

Nuclear Department

February 21, 1984

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20014

Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch 1
Division of Licensing

Gentlemen:

RESPONSE TO FIRST QUARTERLY REPORT
NUCLEAR OVERSIGHT COMMITTEE
SALEM GENERATING STATION
DOCKET NO. 50-272 AND 50-311

PSE&G hereby submits its response to the first quarterly report of the Nuclear Oversight Committee, which was transmitted to you on January 26, 1984.

Sincerely,

E. A. Liden
Manager - Nuclear
Licensing and Regulation

Attachment

cc: Mr. H. Kister, Chief
Projects Branch No. 2, DPRP
Region 1

Mr. Donald C. Fischer
NRC Licensing Project Manager

Mr. James Linville
Senior Resident Inspector

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The Energy People

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February 21, 1984

RESPONSE TO QUARTERLY REPORT
NUCLEAR OVERSIGHT COMMITTEE
JANUARY 23, 1984

The Action Plan

The NOC report of 1/23/84 contained a committee concern ". . . about the tension that inevitably exists between operational responsibilities on the one hand and Action Plan responsibilities on the other". PSE&G Management anticipated the need to ensure that safe plant operations would not in any way be impacted by Action Plan commitments. Key provisions were made during the planning phase of the Action Plan Program to this effect. These provisions included the following:

1. All written and oral communications by the Vice President - Nuclear about Action Plan activities would emphasize that the Action Plan commitments were very important but second in priority to the continued safe operation of the nuclear units;
2. The General Manager - Salem Operations and his direct reports would continue to emphasize the safe operation of facilities in day to day management activities;
3. If personnel assignments to Action Plan responsibilities negatively impacted on any individual's ability to address sufficient time and attention to plant operations or safety concerns, the assignment would be changed;
4. Where appropriate, contract/consultant support would be used to support timely implementation of Action Plans.
5. A consultant would be engaged to direct implementation of the Action Plan, thereby minimizing resource depletion and providing independent program management.

With respect to scheduling provisions, an extensive resource analysis effort enabled PSE&G to determine the manpower required to meet an aggressive schedule. Prudent float was integrated into the schedule to accommodate contingencies and to ensure continued safe operation and timely implementation of Action Plans.

Schedule refinements to date have been utilized for one of the following reasons:

- Where extensive resource loading would impact the Department's activities, sequences of activities were rearranged to eliminate that impact,
- Where specific company expertise was required in different Action Plans simultaneously,
- To identify and obtain necessary consultants and/or contract support and,
- To utilize the results of assessment steps in some Action Plans wherein the definition of scope was actually dependent on these initial assessment results.

It should be noted that any refinements in schedule are taking place within the time frame allowable for meeting NRC commitments. Such refinements should not at this time be mistaken for schedule slippages as long as trending indicates that activities will be completed on or before the respective commitment dates made to the NRC. To date, all activities appear to be trending on schedule.

In response to the specific changes identified in the NOC Quarterly Report our records show that:

1. The change of (1) month in Action Plan 2.1.2 was an error made during the transposition of information from one set of documents to another and has been corrected.
2. The change of six (6) months in Action Plan 2.1.3 is due to changing the date for the follow-up assessment (activity 2.1.3.7). This change allows activity 2.1.3.7 to be, in fact, a follow-up assessment by providing sufficient time between the final implementation step and the follow-up assessment.
3. Design Change Control is an integral part of Configuration Management. Action Plans 2.3.1 (Configuration Management) and 2.3.2 (Design Change Control) were therefore integrated into one program. This resulted in schedule refinements by the sponsor in conjunction with his consultant. These included allowing more realistic time for evaluating the existing system, and for developing implementation plans, scoping documents and schedule. There is no change in the overall completion date.

4. The change of three (3) months in Action Plan 2.4.4 was due to the amount of time required (3 months) to locate an appropriately qualified consultant.
5. The change of three (3) months in Action Plan 2.6.2 was a refinement resulting from re-evaluation of the amount of time required to update warehouse support portions of the Managed Maintenance Program.

Safety Organization

The Action Plan to Improve Safety Review Management Activities (2.2.1) was specifically designed to evaluate the existing safety review management process and to address improvements that would maximize the effective use of resources. Work is progressing on schedule on this Action Plan with the aid of a consultant. To date the responsibilities, mission objectives, charters, governing procedures of various groups that have a safety involvement have been reviewed. In addition discussions have been held with several experienced utilities regarding their safety review management process. The data is currently under evaluation.

Evaluation of Safety Improvement

The Nuclear Department is developing a set of performance indicators using recommendations provided in INPO Good Practice OA 102, information from other utilities, and our experience to date. In order to obtain manager input and acceptance of these indicators and to take full advantage of performance indicators as management tools, a process was established wherein the key Nuclear Department managers periodically meet to identify potential performance indicators. Samples of these potential performance indicators will be reviewed and evaluated relative to measuring overall plant safety and improvement in Nuclear Department operations.

The performance indicator process is presently in progress and a listing of the performance indicators being evaluated will be discussed at the next NOC meeting.

With regard to backlogged maintenance work orders, it should be noted that safety related changes in the plant can be accomplished via a Design Change Request (DCR), A Deficiency Report (DR), or On-the-Spot Change to an existing procedure. All of these vehicles are covered by work orders in order to control their implementation in the field.

The lower priority plant changes that remain today are a result of the large volume of higher priority commitments, retrofits, and corrective maintenance items. The long standing lower priority plant changes are being reviewed for current applicability, and those deemed not necessary are being rejected. Those plant changes that are still required are being reissued.