



PSE&G

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Richard A. Uderitz Vice President — Nuclear

December 31, 1984

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Washington, DC 20555

Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch, No. 1

PSE&G ACTION PLAN 2.4.1, MAINTAINING PLANT
CLEANLINESS AND GENERAL APPEARANCE AT A HIGH STANDARD
SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311

Gentlemen:

This letter is to notify you that we require an extension of the completion date for full implementation of PSE&G Action Plan 2.4.1, Maintaining Plant Cleanliness and General Appearance at a High Standard.

As part of the Action Plan for Improvement of Nuclear Department Operations, PSE&G committed to develop and implement an action plan by which the cleanliness and general appearance (material condition) of the Salem Station would be brought to a high level and subsequently maintained at this level. This action plan was to be completed by December 1984.

Under the sponsorship of the Operations Manager - Salem, a 2.4.1 action plan committee was formed to plan and implement a new Salem Station housekeeping policy. The objective was threefold: first, cleanup the station to establish an acceptable reference standard; second, establish a long term program involving all station personnel which would maintain acceptable housekeeping conditions appropriate to operating conditions; and three, implement policies and programs to improve the collective station attitude toward housekeeping.

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Although the station cleanliness level has improved, and a revised station housekeeping program has been implemented, with orientation and team building sessions having been initiated, we do not feel we have achieved the desired results to complete the action plan. (A more detailed description of the action plan implementation is provided by the attachment.)

Certain plant areas were not sufficiently addressed because of the constraints and manpower limitations resulting from the back-to-back Salem Unit 1 and 2 outages. The Salem Unit 1 outage made clean-up particularly difficult because it extended through the summer of 1984 during which time PSE&G used twenty-five summer student employees on its Turbine Building clean-up project.

In order to upgrade plant cleanliness, material condition and appearance in those areas which were previously insufficiently addressed, we are establishing a renewed upgrade effort. We have organized a special housekeeping task force under the direction of the Technical Manager - Salem which is comprised of dedicated supervisory-level personnel from each station department and from the Nuclear Services and Support Departments. The task force will provide specific direction to each department. Implementing personnel will be drawn from station staff, contractors and 1985 summer student employees.

This renewed effort to meet Action Plan 2.4.1 upgrade objectives will be established as a formal program in January 1985. We will also continue implementing our revised housekeeping program and will extend its scope to include maintaining the cleanliness level of each new area as it is improved.

This upgrade program will be coordinated with our current Salem Unit 2 outage and is expected to take approximately six months to complete after the Unit 2 outage is complete. Accordingly, we find it necessary to extend our Action Plan 2.4.1 completion date from December 31, 1984 to September 30, 1985.

We will continue to keep you informed regarding the implementation status of this action plan.

Sincerely,



Mr. Steven A. Varga

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C Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs

Mr. Donald C. Fischer
Licensing Project Manager

Mr. James Linville
Senior Resident Inspector

**PSE&G ACTION PLAN 2.4.1
MAINTAINING PLANT CLEANLINESS AND GENERAL APPEARANCE
AT A HIGH STANDARD**

- Implementation Summary -

Under the sponsorship of the Operations Manager - Salem, a 2.4.1 action plan committee was formed to plan and implement a new Salem Station housekeeping policy. The Objective was threefold: first, cleanup the station to establish an acceptable reference standard; second, establish a long term program involving all station personnel which would maintain acceptable housekeeping conditions appropriate to operating conditions; and three, implement policies and programs to improve the collective station attitude toward housekeeping.

The first objective - cleaning up the station - involved several elements. First, a general walk-through of the entire Salem power block area was conducted by the Maintenance Department. Trash, litter and equipment and miscellaneous materials were either thrown out or properly stored. Each department conducted a similar activity in their respective work and storage areas. The action plan committee then determined which areas of the station required special attention. It was decided that storage cages everywhere were to be cleaned and renovated, that the Unit 2 Turbine Building required massive cleanup, painting and insulation work and that the Auxiliary Building 78" elevation Mechanical Penetrations and both Fuel Handling Buildings required special decontamination and cleanup. To meet these needs each department was requested to renovate their storage facilities. Substantial improvement was achieved using PSE&G craft labor. For the Turbine Building project, twenty-five summer employees and six Operations Department supervisors completed fourteen weeks of cleanup and painting work. Insulation work in the Turbine Building was performed by Johns-Manville. Hydro Nuclear Services was contracted to perform special decon and cleanup of the mechanical penetrations and the Fuel Handling Buildings. The duration of that project was approximately eight weeks. Throughout the entire cleanup project the Maintenance Department contracted with RAPP, Inc. to provide various services and equipment.

The second objective was to develop a long term program to ensure acceptable housekeeping standards were maintained appropriate to plant operating conditions. The action plan committee determined that this objective could be met if four things were accomplished. First, housekeeping policies had to be formalized by inclusion in station and department procedures. Second, training had to be given to all station personnel through GEI and phase training modules in order to emphasize and repeat management commitment to the housekeeping program. Third, management involvement had to be increased and formalized through the implementation of an inspection program. And Fourth, a

dedicated cleaning, painting and insulating organization had to be created in order to centralize responsibility, authority and expertise in the area of housekeeping. AP-31, Station Housekeeping, was completely revised and individual department housekeeping procedures were written. In addition to defining areas of responsibility, these procedures set up management inspections designed to monitor and improve the housekeeping and material condition of the station. The Training Department developed and implemented housekeeping modules for all craft disciplines and for GEI. The objective of this training was to continuously advise personnel of their responsibility toward housekeeping and to show that management is indeed concerned about housekeeping on the job. Unfortunately, the dedicated cleaning, painting and insulating function which was created by implementation of Action Plan 2.6.1, Clarifying Organizational Responsibility and Interface in the Maintenance Area, had to be canceled when that action plan could not be fully implemented. (See letter, R. A. Uderitz to Mr. Steven A. Varga, Action Plan for Improvement of Nuclear Department Operations Salem Generating Station Docket Nos. 50-272 and 50-311, December 24, 1984.)

The third objective of the action plan was to attempt to improve the overall attitude toward housekeeping. The action plan committee believed that the key to success in this category involved a "buying in" to the program by station employees, especially at the department manager and engineer levels. Consequently, procedures and programs necessarily involve upper management participation and then proceed to delegate authority and responsibility down through the chain of command. By making more people more accountable, more people will care about housekeeping.