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

Nuclear Department

February 15, 1985

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

Gentlemen:

NUCLEAR OVERSIGHT COMMITTEE
RESPONSE TO QUARTERLY REPORT
SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311

Enclosed for your information is a copy of our response to the
January Quarterly Report of our Nuclear Oversight Committee.

Should you have any questions, do not hesitate to contact us.

Sincerely,

E. A. Liden
Manager - Nuclear
Licensing and Regulation

Enclosure

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RESPONSE TO QUARTERLY REPORT
NUCLEAR OVERSIGHT COMMITTEE
JANUARY 18, 1985

ACTION PLAN STATUS

During the NOC meeting, the Action Plan Program Director identified four action plans as having potential for not being complete by their scheduled dates:

- Action Plan 2.2.2 Commitment Identification, Tracking and Close-out
 - 2.4.1 Maintaining Plant Cleanliness and General Appearance at a High Standard
 - 2.4.4 Site Protection and Emergency Preparedness
 - 2.6.2 Enhancing Maintenance Planning, Monitoring and Control

Action Plans 2.2.2 and 2.4.4 were completed and closed-out by the December 31, 1984 NRC commitment date.

Action Plan 2.4.1 was not closed-out by December 31, 1984 as scheduled, and the NRC was notified. Although the Salem Station cleanliness level had been improved and a revised station housekeeping program had been implemented, our desired cleanliness standards had not been achieved. Certain plant areas had not been sufficiently addressed because of the constraints and manpower limitations resulting from the back-to-back Unit 1 and 2 forced outages. As a result, a renewed upgrade effort is being initiated and will be coordinated with the current Unit 2 outage. The new completion date for this plan is September 30, 1985.

Action Plan 2.6.2 is not scheduled for completion until June 30, 1985, nevertheless PSE&G is concerned with the magnitude of the project and its implementation schedule. Several meetings have been held to formulate issues and recommendations, including senior management review of the plan status and direction. The major contributor to our schedule concern is the preferred scope of the plan after detailed evaluation by the action plan working group.

For all action plans, implementation activities and/or assessments are performed after the action plans are closed-out. We recognized the need for a follow-up program early in the Action Plan Program and discussed this program with you at the last NOC meeting. We have ensured that, as each action plan requiring follow-up activities is closed-out, identification of implementation and assessment activities are included in the close-out documents. We are currently completing efforts to formalize a program to track and report on these activities.

ENGINEERING ORGANIZATION

As addressed at the NOC meeting, the Nuclear Engineering Department, with the cooperation of Salem Operations, is in the process of developing a minor DCR system intended to aid in the acceleration and implementation of minor changes within the Salem Station. In addition, a Nuclear Engineering organizational realignment was discussed with the NOC wherein a small complement of engineering resources would be assigned directly to Salem Station to support implementation of minor design changes and to provide immediate response to day-to-day operational problems. Additionally, the designation of system or cognizant engineers within the Salem Station organization was also discussed with the NOC. These engineers would be assigned specific plant system responsibilities. The NOC recommended that implementation of these programs be accelerated. It is our intent to implement these programs upon completion of the No. 2 Unit outage.

MAINTENANCE WORK ORDER BACKLOG

Within certain budget constraints, an aggressive program to reduce the backlog of both outage and non-outage work orders continues at Salem Station.

With the assistance of supplemental contractor support, the Station Maintenance Department has maintained the backlog of non-outage work orders below 400 for the past two weeks. Our goal is to maintain a backlog of less than 400 non-outage work orders without dependence upon outside contractors and within INPO guidelines. We view this as an achievable goal when Unit 2 returns to service following the termination of the present outage.

A contributing factor to the continuing number of work orders is the emphasis we have placed on station personnel (particularly the Operations Department) to identify and report equipment deficiencies and material condition problems, such that timely corrective action can be taken through the work order system.

Outage work orders will continue to increase as an outage approaches primarily due to scheduled preventive and corrective maintenance. Our current target is to return the unit to service with a minimum number of outage work orders backlogged.

In the Station I & C Department, the reduction of non-outage work orders is more difficult. The preventive maintenance program and the environmental qualification program have significantly increased the I & C efforts. The ability to secure supplemental qualified union contractors to perform the I & C function is difficult. We have recently increased the number of WISCO technicians to address this area. Additionally, we expect to enter into an agreement with WISCO which will permit additional qualified union I&C personnel to be utilized at Salem. The Station I&C Department is reviewing INPO Guidelines, which are presently utilized by the Station Maintenance Department, to monitor progress in reducing backlogged work orders.

We will continue to vigorously pursue the corrective actions necessary to reduce the backlog of non-outage work orders and maintain them at manageable levels without the use of outside resources. If established limits are exceeded, supplemental resources will be utilized to reduce the backlog to below the limit established.

AUDITS

A number of internal and external groups conduct oversight, review and audit activities related to the Nuclear Department. In many instances these activities overlap and are somewhat redundant. The Nuclear Department can exert limited control over the charter, scope and schedule of external groups such as the Nuclear Regulatory Commission, the Institute of Nuclear Power Operations, Nuclear Mutual Limited, American Nuclear Insurers, and the Board of Public Utilities.

The Nuclear Department is reviewing and attempting to reduce the redundancy associated with those internal oversight groups which we may be able to influence. We would be pleased to discuss the status of this review and our efforts to reduce redundant audit activity at the March NOC meeting.

SALP REPORT

The SALP report is structured to provide an overall performance appraisal in certain broad categories covered by regulations. Specific examples are cited in particular instances to provide additional insight into the reason for the rating.

We have, in certain areas, assigned the responsibility for resolution of particular issues to individuals. In the more general case, the functional areas appraised align directly with a department manager who has responsibility and authority for improving the performance in his functional area.

Certain broader issues appear in more than one category or area. Our Nuclear Licensing and Reliability organization has reviewed this and other appraisal reports to determine if these broader issues are being addressed by activities or programs that are underway at the current time. Where this is not the case, the existing programs will be adjusted, or additional programs initiated, to assure that appropriate corrective actions are taken. Specific individuals or department managers will be assigned as appropriate.

PERSISTENT PROBLEMS

Although the NOC Report refers to persistent problems with the Feedwater System, the following response describes problems with the Service Water System which we believe was the subject of interest.

The Service Water System has had problems since its initial operation, in that the Delaware River water is heavily laden with silt and is very erosive. Initially a study was performed to identify any corrective measures which could be applied to the system. Materials in the heat exchangers have been upgraded and annual preventive maintenance is performed to assure the proper level of system performance.

Since the initial study, components have been upgraded and recommended maintenance has been performed. System maintenance activities have a major impact on outage schedules. At this time, we have requested bids from major architect engineer firms for performance of a Service Water System study. The purpose of the study is to evaluate the feasibility of utilizing a closed loop for the Containment Fan Coil Units and placing the room coolers and lube oil coolers on a chilled water type system. These modifications would eliminate the use of river water in 85% of the Service Water piping in the plant. Additionally, Service Water System operating pressure would be reduced and thus eliminate the cavitation problems experienced at the control valves.

EHC SYSTEM

With regard to the NOC's concern related to EHC cards, it has always been our intent to perform an autopsy of all suspect EHC cards. The suspect cards related to the recent EHC problems are presently being analyzed by Westinghouse.

We have discussed the adequacy of the monitoring equipment being used with Westinghouse and our Nuclear Engineering Department and believe it to be adequate.

The NOC had expressed a concern that there was no Nuclear Engineering involvement with the Unit 1 EHC System problems. Nuclear Engineering had significant involvement with the Unit 1 plant trips attributed to the Turbine EHC System, as was indicated by the General Manager - Nuclear Engineering at the last NOC meeting.

Although the Nuclear Engineering Sponsor assigned to the Turbine EHC had been reassigned to the generator replacement project, other I&C engineers and the group head were directly involved. A design change package to replace the first stage pressure transmitters was prepared in one day's time when this was thought to be the original problem.

Nuclear Engineering I&C personnel worked closely with Salem Operations I&C personnel to identify the proper turbine parameters to be recorded on Brush Recorders. Nuclear Engineering personnel monitored the recorder charts daily and were present at all meetings and activities associated with the EHC.

ENGINEERING MANPOWER

In the original organization (1982) for Nuclear Plant Engineering the people responsible for Digital Circuit Engineering (i.e., Computer hardware and software engineering) were reporting to the I&C group head. It was soon recognized that this function required a larger separate group with its own cognizant group head. To date, a principal computer engineer has been hired and the approved staffing level was increased from 2 to 5. There is presently one open position to be filled and an active recruitment search is underway.

In addition, the Hope Creek site engineering group has an approved staffing level of 5 engineers dedicated to digital circuit engineering. There are presently 4 engineers on site and 1 open position. These engineers are scheduled to be transferred to Nuclear Engineering Department as part of the Hope Creek transition plan.