

Public Service
Electric and Gas
Company

Corbin A. McNeill, Jr.
Vice President -
Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 339-4800

May 24, 1985

Dr. Thomas E. Murley
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Attention: Samuel J. Collins, Chief
Projects Branch No. 2
Division of Reactor Projects

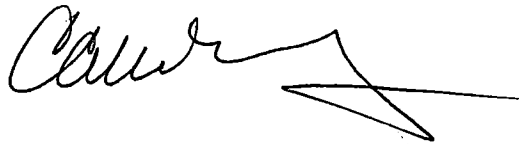
Gentlemen:

INSPECTION 50-311/85-08
SALEM GENERATING STATION
UNIT NO. 2
DOCKET NO. 50-311

Public Service Electric and Gas Company is in receipt of your letter dated April 25, 1985, which transmitted a Notice of Violation in regard to construction work being performed.

Pursuant to the provisions of 10 CFR 2.201, our response to the Notice of Violation is provided in Attachment 1.

Sincerely,



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PDR ADDCK 05000311
PDR

Attachment

C Mr. Donald C. Fischer
Licensing Project Manager

Mr. Thomas J. Kenny
Senior Resident Inspector

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ATTACHMENT 1

10CFR PART 2.201 INFORMATION
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
SALEM GENERATING STATION
RESPONSE TO NOTICE OF VIOLATION

Your letter of April 25, 1985, identified a violation of PSE&G Nuclear Operations Quality Assurance Manual Procedure QAP 5-3, "Inspection Program", involving the installation of the 2C battery support rack, a structure important to safety, without quality assurance control. No inspection hold points were delineated as required by QAP 5-3 and no waivers were documented to allow for the lack of inspection hold points. The following is a response to the Notice of Violation.

1. PSE&G DOES NOT DISPUTE THIS VIOLATION.
2. THE ROOT CAUSE OF THIS VIOLATION WAS A QA PROGRAM WEAKNESS WHICH PERMITTED A WORK ACTIVITY TO BE PERFORMED WITHOUT REQUIRED QA COVERAGE.
3. IMMEDIATE CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED.
 - a. A comprehensive review of all in-process safety related/QA required and non-safety related/QA required Design Change Packages was conducted to assess their adequacy with respect to Quality Control, including, but not limited to, the inclusion of Inspection Hold Points where required.

All twenty-five (25) in-process safety related/QA required and non-safety related/QA required Design Change Packages were found to be adequate with respect to Quality Control.
 - b. Salem QA Station Procedure Q-09, Design Change Package Review, has been revised to incorporate pre-implementation QA review elements required by Nuclear Quality Assurance Department Manual, GM9, including, but not limited to, Inspection Hold Points.
 - c. A letter has been issued to all QA personnel who conduct pre-implementation reviews of Design Change Packages emphasizing the review for Inspection Hold Points as required by Nuclear Quality Assurance Department Manual.

4. LONG TERM CORRECTION ACTIONS TO AVOID FURTHER VIOLATIONS

- a. Salem Generating Station procedures will be revised to require that the PSE&G Quality Assurance Department is notified prior to commencement of subcontracted safety related work. The PSE&G QA department will verify that all subcontracted work is accomplished by suppliers with an approved Quality Assurance Program or that PSE&G's Quality Assurance Program is applied. These revisions will be completed by July 1, 1985.
- b. The Salem Station Maintenance Department will develop a specific procedure for installation and verification of Hilti drop-in anchorages and high-strength bolting of structural steel. This procedure will be completed and implemented by June 13, 1985.
- c. A single enhanced Design Change Package pre-implementation QA Review Checklist for the Nuclear Quality Assurance Department Manual has been developed. This checklist, which includes activities requiring Inspection Hold Points, has been issued for approval. We will incorporate and implement the enhanced Design Change Package pre-implementation QA Review Checklist in the Nuclear Quality Assurance Department Manual by July 1, 1985.
- d. A review of existing PSE&G procedures for activities listed in QAP 5-3, Attachment 1, will be conducted to ensure that required Inspection Hold Points are appropriately designated.

This review will be completed by July 1, 1985.

5. FULL COMPLIANCE WILL BE ACHIEVED BY JULY 1, 1985.