

Public Service
Electric and Gas
Company

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NLR-N87154

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

RESPONSE TO NOTICE OF VIOLATION
NRC COMBINED INSPECTION REPORT NO. 50-272/87-08
AND 50-311/87-09
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

Public Service Electric and Gas Company (PSE&G) has received the subject inspection report dated July 17, 1987, which included a Notice of Violation regarding the failure to procedurally control the 1980 walkdown of masonry walls in the Salem Generating Station in response to NRC IE Bulletin 80-11, and the lack of calculations demonstrating the structural adequacy of the masonry walls and modifications made to them in response to the bulletin. Pursuant to the requirements of 10CFR2.201, our response to this Notice of Violation is provided in the attachment to this letter.

Should you have any questions on this transmittal, do not hesitate to call.

Sincerely,



Attachment

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C Mr. D. C. Fischer
USNRC Licensing Project Manager

Mr. T. J. Kenny
USNRC Senior Resident Inspector

Mr. W. T. Russell, Administrator
USNRC Region I

Mr. D. M. Scott, Chief
Bureau of Nuclear Engineering
Department of Environmental Protection
380 Scotch Road
Trenton, NJ 08628

ATTACHMENT

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
RESPONSE TO NOTICE OF VIOLATION

Your letter of July 17, 1987 transmitted NRC Inspection Report No. 50-272/87-08 and 50-311/87-09 for Salem Units 1 and 2 which included a Notice of Violation related to our response to NRC IE Bulletin 80-11, Masonry Wall Design. The violations and our related responses are presented below.

Violation No. 1 (50-272/87-08-01 and 50-311/87-09-01)

10CFR50 Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and that they shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, as of April 10, 1987, a written procedure providing the scope and the quantitative and qualitative acceptance criteria was not documented for the 1980 walkdown survey of block walls performed in response NRC Bulletin 80-11 to determine their location in relation to safety-related equipment.

RESPONSE

1. PSE&G DOES NOT DISPUTE THE VIOLATION
2. THE ROOT CAUSE OF THIS VIOLATION WAS THE ABSENCE OF A PROCEDURAL CONTROL TO EFFECT THE DEVELOPMENT OF A FORMALIZED PROCEDURE OR GUIDELINE FOR THE PERFORMANCE AND DOCUMENTATION OF A PRESCRIBED EVALUATION/ANALYSIS OF SAFETY-RELATED STRUCTURES, SYSTEMS, OR COMPONENTS CALLED FOR BY A REGULATORY DOCUMENT (SUCH AS NRC BULLETIN 80-11)
3. IMMEDIATE CORRECTIVE ACTIONS AND RESULTS ACHIEVED

The 1980 walkdown survey of the masonry walls at Salem Units 1 and 2 was performed to identify all such walls and subsequently exclude from further consideration, those whose distance from safety-related components was such that adverse interaction was improbable. We remain confident that the application of the above criteria was appropriate to accomplish the intended purpose of the walkdown. As such, no short term action with respect to this violation is required. NRC review of activities performed in response to NRC Bulletin 80-11 (including review performed during the April 7-10, 1987 inspection) has indicated that the work

done in response to the Bulletin was acceptable and that no operability questions exist.

4. LONG TERM CORRECTIVE ACTIONS TO AVOID FURTHER VIOLATIONS

On March 1, 1985, a PSE&G Engineering Department procedure was developed to assure that activities undertaken in response to concerns put forth in NRC Bulletins and Information Notices are performed under procedural control and documented accordingly (Procedure GM8-EMP-008, "NRC Bulletins, Information Notices and INPO SOERS"). Paragraph 6.3 of this procedure mandates the performance of a safety evaluation or engineering evaluation to document the review and disposition of NRC or INPO documents. This procedure will be amended to specifically remind personnel to document qualitative and quantitative criteria to be applied if field walkdowns or investigations are necessary. This procedure revision will be completed and approved by September 30, 1987.

Also, a design memorandum has been drafted by PSE&G Engineering to specify the NRC Bulletin 80-11 inspection parameters which shall be used in the future to perform inspections to verify the structural integrity of the masonry walls at Salem Units 1 and 2 which could have a potential adverse affect on safety-related systems. This design memorandum will be completed and approved by September 30, 1987. At the request of the lead inspector for the inspection performed on April 7-10, 1987, a copy of the completed design memorandum will be forwarded to the NRC Region I office for his review.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

As related specifically to the masonry walls, full compliance with 10CFR50, Appendix B, Criterion V will be achieved when the design memorandum to control the future assessment of the Salem Unit 1 and 2 masonry walls is completed and approved on September 30, 1987.

Violation No. 2 (50-272/87-08-02 and 50-311/87-09-02)

Criterion XVII of 10CFR50, Appendix B requires that sufficient records be maintained to furnish evidence of activities affecting quality, and PSE&G Engineering Directive EDD #4, Revision 1, requires that calculations shall record the structural adequacy of design and be maintained for design history.

Contrary to the above, recorded and controlled calculations did not exist for all of the masonry walls and for modifications made to them in response to NRC Bulletin 80-11.

RESPONSE

1. PSE&G DOES NOT DISPUTE THE VIOLATION
2. THE ROOT CAUSE OF THIS VIOLATION WAS INADEQUATE USE OF PROCEDURES
3. IMMEDIATE CORRECTIVE ACTIONS AND RESULTS ACHIEVED

It should be noted that the violation is specifically related to the control, documentation, and retrievability of the design calculations which were done for the masonry walls at Salem. The original calculations were performed by Computech Engineering Services, Inc. The results of the analyses performed by Computech were available during the inspection but the analyses themselves were not. The reevaluation calculations (those subsequently performed to justify the acceptability of modifications to the walls which were required) were not properly controlled and therefore difficult to retrieve at the time of the inspection.

PSE&G has requested the out-of-plane analyses/calculations from Computech Engineering Services, Inc., the engineering firm contracted to perform the block wall analyses in 1980. When received, this information will be filed so that it is retrievable and retained appropriately as a design record.

A program to update these original calculations to the current design configuration is addressed in Item 4. below.

4. LONG TERM CORRECTIVE ACTIONS TO AVOID FURTHER VIOLATIONS.

Upon receipt of the Computech calculations discussed above, a program to update these calculations to reflect the current plant configuration will begin. This program will address both modifications to the walls made as a result of the original NRC Bulletin 80-11 evaluations and any subsequent plant modifications interfacing with these walls. A specific completion date for this effort cannot be determined until the Computech information is received. However, completion of the effort is currently targeted for December 1, 1987.

The current PSE&G Engineering Department procedure which controls the design change process, GM8-EMP-009 - Design Change Requests, currently includes Mechanical, Civil, and Electrical and Controls discipline reviews for NRC Bulletin 80-11 consideration in Exhibit 17 of the procedure, Engineering Checklist. This will ensure that the potential effect of masonry walls on safety related structures, systems, or components is considered in the future for all design changes. Additionally, GM8-EMP-009 requires specific identification of calculations and other documents which

justify the acceptability of design interfaces. We believe that these programmatic elements will preclude future recurrence.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

We believe that the current procedure which controls the design change process (GM8-EMP-009) complies with the requirements of 10CFR50, Appendix B, Criterion XVII. As related specifically to the masonry walls, full compliance will be achieved when all of the wall calculations have been assembled and appropriately filed. This effort is tentatively scheduled for completion on December 1, 1987.