Public Service
Electric and Gas
Company

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United States Nuclear Regulatory Commission
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Gentlemen:

RESPONSE TO NOTICE OF VIOLATION
NRC COMBINED INSPECTION REPORT NO. 50-272/87-30 AND 50-311/87-31
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 December 9, 1987, which included a Notice of Violation regarding the failure to adequately control locked high radiation area doors, failure to follow RWP requirements, and failure to have procedures for use and calibration of breathing zone air samplers (MP-hour meters). 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 December 9, 1987, transmitted NRC Inspection Report Nos. 50-272/87-30 and 50-311/87-31 for Salem Units 1 and 2 which included a Notice of Violation. The violations and our related responses are presented below.

Violation A

> Technical Specification 6.12, "High Radiation Area," requires, in part, that areas with a dose rate greater than 1000 mrem/hour shall remain locked except during periods of access by personnel.
>
> Contrary to the above, on October 8, 1987, on two separate occasions, a locked high radiation door to the 78' bioshield area of the Unit 2 containment was defeated and left unlocked. Licensee survey measurements inside the bioshield area indicated dose rates in excess of 1000 mrem/hour.

RESPONSE

1. IMMEDIATE CORRECTIVE ACTIONS AND THE RESULTS ACHIEVED

Immediately upon discovery of the defeated high radiation area doors leading to Unit 2 bioshield, radiation protection technicians secured the doors. All other locked high radiation area doors in Unit 2 were verified to be locked. Tours were performed to ensure that personnel inside the bioshield were authorized for that area. Computer access logs were reviewed to identify individuals who could have been in the area and to ensure that no unusually high personnel exposures occurred. Documentation of the incident was initiated in accordance with current station Administrative Procedures. Personnel entering the containment were required to sign-in on a special sheet (one time only) at the main control point acknowledging understanding of locked high radiation door requirements and the potential consequences of non-compliance with those requirements. Fact-finding sessions were held with the individuals who were signed in on RWPs for the bioshield area during the periods when the incidents occurred. Subsequently, structured interviews were conducted by department managers with those individuals in an attempt to identify the responsible person(s). Evaluation of the

findings was conducted by the Operations Manager and the Radiation Protection/Chemistry Manager and final recommendations were determined by the General Manager - Salem Operations. A letter was issued to all department managers from the General Manager - Salem Operations describing high radiation area control requirements and the proper use of high radiation doors. Department managers reviewed this information with all station personnel and contractors working in the radiologically controlled area. There have been no abnormally high radiation exposures during or since the events described above. There have been no subsequent failures of locked high radiation doors or the administrative systems governing them. Personnel awareness of the significance of the proper procedures for locked high radiation area control has been increased as a result of the letter from the General Manager and the direct involvement of the station department managers.

2. LONG TERM CORRECTIVE ACTIONS TO AVOID FURTHER VIOLATIONS

Radiation worker training and review modules will be strengthened in the area of locked high radiation area control. Source reduction, elimination, and/or shielding will be implemented within the bioshield at the beginning of an outage to eliminate the need for locked high radiation area doors as practical.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.
Long term corrective actions will be completed by September 1, 1988.

Violation B

Technical Specification 6.11, "Radiation Protection Program," requires, in part, that procedures for personnel radiation protection shall be approved, maintained and adhered to for all operations involving personnel radiation exposure. Procedure RP-202, "Radiation Work Permits" (RWPs), requires, in part, that if the job requires continuous Radiation Protection coverage, the Radiation Protection Technician assigned to the job shall brief the work party and the pre-job briefings shall be documented on Attachment 12.3, "Pre-Job Briefing Summary," and filed with the respective RWP. Attachment 12.1, "RWP Compliance Agreement", to Procedure RP-202, "Radiation Work Permits", states that "your (the worker's) signature below indicates that you (the worker) have read, understand, and will abide by the provision of the RWP referenced above."

Contrary to the above:

1. The inspector identified ten (10) instances where pre-job briefings were required by the RWP, but were either not performed or not documented on a Pre-Job Briefing Summary form.

2. On three occasions where MPC-hr meters were required by the RWPs (87-810, 87-813 and 87-962), individuals signed the RWP Compliance Agreements, but MPC-hr meters were not used.

RESPONSE

1. IMMEDIATE CORRECTIVE ACTIONS AND RESULTS ACHIEVED

Procedure RP 202 was reviewed immediately to verify the requirements for pre-job briefings. The procedure steps requiring documentation of pre-job briefings were misleading and did not meet the intent of the overall program. With respect to MPC-hr meters, the requirements for use were reviewed with all Radiation Protection personnel, the commitment to use MPC-hr meters was reaffirmed. Additional instruments were purchased to ensure adequate supply exists.

2. LONG TERM CORRECTIVE ACTIONS TO AVOID FURTHER VIOLATIONS

Procedure RP 202 will be revised to more clearly delineate the requirements for a documented pre-job briefing.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved upon implementation of the revised procedure RP 202 which will occur by March 1, 1988.

Violation C

Technical Specification 6.8, "Procedures and Programs", requires, in part, that procedures be established, implemented and maintained which meet the requirements and recommendations of Regulatory Guide 1.33, 1978, Appendix "A". Regulatory Guide 1.33, 1978, Appendix "A", states that procedures for airborne radioactivity calibrations be established.

Contrary to the above, airborne radiation monitors, specifically MPC-hr meters, were being used by the licensee to monitor personnel exposure to airborne radioactive material for the purpose of showing compliance with regulatory requirements without established procedures for their use and evaluation of their results. Also, contrary to the above, calibrations of the MPC-hr meters were being performed without established procedures.

RESPONSE

1. IMMEDIATE CORRECTIVE ACTIONS AND RESULTS ACHIEVED

The instructions that were in effect on MPC-hr meters were reviewed immediately. All those requirements were put into effect prior to the end of the inspection. MPC-hr meters have been in use for over one year. Results from MPC-hr meters correlate well with area air samples and whole body count results.

2. LONG TERM CORRECTIVE ACTIONS TO AVOID FURTHER VIOLATIONS

Procedure(s) will be written for the use and calibration of the MPC-hr meters. The procedure(s) will be implemented by March 1, 1988.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved upon completion of the procedure(s) on MPC-hr calibration and use on March 1, 1988.