

Public Service
Electric and Gas
Company

Stanley LaBruna

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Vice President - Nuclear Operations

AUG 02 1989
NLR-N89150

United States Nuclear Regulatory Commission
Document Control Desk
Washington DC 20555


Gentlemen:

ADDITIONAL RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-272/88-24 AND 50-311/88-27
SALEM GENERATING STATION
UNITS NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

Public Service Electric and Gas Company (PSE&G) submitted its response to the subject inspection report dated March 10, 1989, addressing a Notice of Violation concerning failure to have procedures for operations support of maintenance calibration of the Diesel Generator Day Tank level indication. The Resident Inspector has indicated that the Notice of Violation did not reflect two of the NRC's concerns with this incident. Therefore, PSE&G submits this additional response to Violation 272/88-24-01.

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

Sincerely,


S. LaBruna
Vice President -
Nuclear Operations

Attachment

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C Mr. J. C. Stone
Licensing Project Manager

Ms. K. Halvey Gibson
Senior Resident Inspector

Mr. W. T. Russell, Administrator
Region I

Mr. Kent Tosch, Chief
New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

ATTACHMENT

PSE&G was notified by the Senior Resident Inspector that the Notice of Violation concerning the Emergency Diesel Generator (EDG) day tank level calibration did not reflect two of the NRC's concerns. PSE&G was requested to address these concerns and agreed to submit an additional response to Violation 272/88-24-01. The concerns expressed were:

- a. How will Operations procedurally control the support of Maintenance activities related to the Diesel Generator day tank level calibration.
- b. How will Operations procedurally support other Maintenance activities which involve the need for operators to operate equipment.

RESPONSE

The EDG day tank incident involved an operator manipulating the EDG fuel oil transfer pumps in support of the maintenance department's efforts to calibrate day tank level transmitter. The operator did not verify that one of the transfer pumps was in "regular" and the other in "backup", prior to maintenance testing the 1C EDG day tank low level setpoint. When the setpoint was reached, both pumps started and an overflow of fuel oil from the 1A EDG day tank resulted (the fuel oil flows to all three day tanks).

PSE&G's original response dated March 10, 1989, determined that the root cause of the D/G day tank spill was the use of inadequate procedures to perform corrective maintenance on a safety related system. This was attributed to the following factors. A lack of proper management oversight in the planning of the activity, and a lack of supervisory awareness of the need for specific instructions when performing maintenance on safety related equipment. The corrective actions implemented at the time of the first response included a detailed review of the event by the Operations Department and subsequent counseling of the individuals involved on the need for proper procedures prior to performing maintenance on safety-related equipment.

In addition to this PSE&G also committed to revise the EDG day tank level control system calibration procedure (M3I) to provide adequate guidance for the full calibration of the system. At this time PSE&G has revised the Maintenance procedure so that the Shift Supervisor is requested to provide an operator to support the the calibration of the EDG day tank. The specific steps necessary for the operator to perform the required task are specifically delineated in the revised M3I procedure.

In regards to maintenance that requires operations support that might occur as a result of trouble-shooting/corrective maintenance on safety related equipment elsewhere in the plant; Maintenance procedures will be utilized as delineated in the Administrative Procedures. The maintenance trouble shooting procedures requires that written instructions be developed prior to performing the trouble shooting activity. For those instances where operations support is necessary, the written instructions will provide the necessary steps to direct the operator, if a specific Operations Department Procedure cannot be used. For other maintenance activities, the specific Maintenance Department Procedure will usually provide the necessary operator direction when a specific Operations Department procedure does not exist. In instances where an Operations Department procedure does not specifically or correctly address the situation, OD-15, Control of Operations Department Procedures, does allow deviation from the specific step sequence in the procedure with Nuclear Shift Supervisor permission. Concurrently, OD-7, Valve Operations and Systems Alignments, allows partial alignment or manipulation of plant systems, provided that specific written directions are provided. It is PSE&G's intent to control these activities within the procedural requirements specified in the Administrative Procedures. Exceptions to working under specific procedures will be per the specific departmental procedures and written direction will be utilized prior to the activity in all foreseeable, non-emergency situations.

The issue of procedure compliance has been emphasized by the Station General Manager and his management team. Each department manager has stressed procedure compliance and the proper use of procedures with their department personnel. Realizing a need to strengthen the station philosophy in regards to procedure use, adequacy and compliance, PSE&G had initiated a Salem Work Practices Improvement Program (discussed in the previous response and in our transmittal dated December 27, 1988). This Program involves a combination of management and engineering personnel working to develop a program that will improve the awareness on the part of personnel as to when procedures are required and the need for strict adherence to procedural requirements. This program which had been scheduled for completion June 30, is now scheduled for completion August 31, 1989.

In addition to the above action, a procedure upgrade program was implemented to evaluate all maintenance related activities within the Station and to upgrade procedures controlling these activities where necessary. One key element in this program is to evaluate generic maintenance procedures and identify where more specific guidance is required. This program originally scheduled for completion December 31, 1992, has been accelerated and is now scheduled for completion in December, 1991.

The Operations Manager will ensure that each Nuclear Shift Supervisor and Senior Nuclear Shift Supervisor is provided with specific direction to ensure that all operator activities which support maintenance on safety related systems is performed in accordance with the process indicated in paragraph four of this response. This will be completed by August 4, 1989. Specific classroom training in this process will be incorporated into the next operator requalification training cycle (which begins in August of 1989).