

08 JAN 1990

Docket Nos. 50-272  
50-311  
EA NO. 89-237

Public Service Electric and Gas Company  
ATTN: Mr. S. E. Miltenberger  
Vice President and Chief Nuclear Officer  
P.O. Box 236  
Hancocks Bridge, NJ 08038

Gentlemen:

Subject: NRC Special Inspection No. 50-272/89-27 and Enforcement Conference Meeting (NRC Special Inspection No. 50-272/89-25; 50-311/89-23)

This refers to two NRC special inspections conducted recently at the Salem Generating Station. NRC Special Inspection 50-272/89-25; 50-311/89-23, conducted on November 17-29, 1989 reviewed the circumstances surrounding your identification of a design error which introduced a single failure vulnerability in the emergency core cooling system (ECCS) and the adequacy of related un-reviewed safety question determinations. The subject inspection report was sent to you on December 5, 1989. On December 11, 1989, an enforcement conference was conducted with Mr. T. Crimmins, Mr. S. LaBruna and other members of your staff to discuss the potential violations, their causes, and your corrective actions. A summary of the enforcement conference and your presentation notes are enclosed with this letter.

The NRC strongly supports comprehensive licensee programs for detection, correction and reporting of problems that affect the safety of plant operations. To the extent that your identification and reporting of the ECCS vulnerability reflects a management commitment to self assessment, these actions were commendable. Although your initial corrective actions did not completely resolve the concern, your subsequent corrective actions, root cause determinations, and actions to prevent recurrence appear to be thorough and complete. The NRC recognizes that the safety significance of the subject ECCS single failure vulnerability was minimal. There was a low probability of the single failure occurring, and the small increase in peak fuel clad temperature during a loss of coolant accident would have remained within 10 CFR 50.46 limits. Further, the design error which introduced the single failure vulnerability occurred in 1987 under a design change program which had been recognized to be weak and for which previous satisfactory corrective action has been taken. Review of other changes made in 1987 did not identify any similar errors. Therefore, for the reasons stated above and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C, a violation is not being cited for the design error which introduced the single failure vulnerability.

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The second issue involved your failure to identify that the emergency operating procedure (EOP) changes implemented on November 17, 1989, as part of your immediate corrective actions to resolve the ECCS single failure concern, contained an unreviewed safety question. A Notice of Violation has been enclosed herewith as Appendix A. In consideration of the low safety significance of the single failure vulnerability discussed previously, the failure to identify the unreviewed safety question is classified as a Severity Level IV violation. Nonetheless any similar violations in the future may result in escalated enforcement action.

Also transmitted with this letter are the findings of our Special Inspection 50-272/89-27 conducted from November 29 - December 1, 1989. The inspection was conducted to review the circumstances surrounding the entry into Technical Specification (TS) 3.0.3 during a turbine volumetric flow test. NRC resolution of a similar incident relative to entry into TS 3.0.3 due to the ECCS single failure concern discussed above is also documented in this inspection report.

NRC determined that in both cases, the unit was in TS 3.0.3 for greater than one hour without actions initiated to commence a plant shutdown. Further, the root cause of the TS 3.0.3 entry associated with the turbine volumetric flow test was not followed up in a timely manner. These issues constitute violations and are described in the Notice enclosed herewith as Appendix B. The NRC acknowledges your corrective actions taken to date relative to TS 3.0.3 entries as discussed following the December 11, 1989 enforcement conference and documented with the attached enforcement conference meeting summary.

NRC also noted that the failure to initiate actions to shutdown within one hour following entry into TS 3.0.3 resulted in tardy reporting to NRC regarding these occurrences in accordance with 10 CFR 50.72(b)(1)(i)(A). You are requested to include in your response to Appendix B, those corrective actions necessary to assure that future conditions requiring initiation of a plant shutdown required by Technical Specifications are promptly reported to NRC.

You are required to respond to this letter and, in preparing your response, you should follow the instructions in the enclosed Notices. After reviewing your response, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further enforcement action is necessary.

In accordance with 10 CFR 2.790, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

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The responses directed by this letter and the enclosed Notices are not subject to the clearance procedures of the Office of Management and Budget, otherwise required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,

William F. Kane, Director  
Division of Reactor Projects

Enclosures:

1. Appendix A, Notice of Violation for NRC Inspection 50-272/89-25;  
50-311/89-23
2. Appendix B, Notice of Violation for NRC Inspection 50-272/89-27
3. NRC Enforcement Conference Meeting Summary and Presentation Material
4. NRC Special Inspection Report 50-272/89-27

cc w/encl:

T. Crimmins, Vice President - Nuclear Engineering  
S: LaBruna, Vice President - Nuclear Operations  
Jack Urban, General Manager, Fuels Department, Delmarva Power & Light  
Co.  
L. K. Miller, General Manager - Salem Operations  
B. A. Preston, Manager, Licensing and Regulation  
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M. J. Wetterhahn, Esquire, Conner & Wetterhahn  
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R. F. Engel, Deputy Attorney General, Dept. of Law and Public Safety  
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NRC Resident Inspector  
State of New Jersey

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bcc w/encl:  
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