

APPENDIX B

NOTICE OF VIOLATION

Public Service Electric and Gas Company.
Salem Unit 1

Docket No. 50-272
License No. DPR-70

As a result of the inspection conducted on November 29, 1989 through December 1, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the following violations were identified:

- A. Technical Specification (TS) 3.0.3 states, in part; when a limiting condition for operation (LCO) is not met except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it in at least HOT STANDBY within the next 6 hours.

Contrary to the above, on November 9 and on November 17, 1989, the plant was under TS 3.0.3 for a period of over one hour and actions were not initiated to place the plant in HOT STANDBY.

This constitutes a severity level IV violation (Supplement I).

- B. 10 CFR Part 50, Appendix B, Criterion XVI of the Nuclear Quality Assurance Department Manual require that measures shall be established to assure that conditions adverse to quality are promptly identified, corrected and prevented from recurring.

Contrary to the above, as of November 29, 1989, the licensee's measures established to assure that conditions adverse to quality are promptly identified, corrected and prevented from recurring were not adequate, in that; power range instrumentation channel N44 failed to function properly on November 9, 1989, when the channel was tripped in accordance with Technical Specifications and operations procedure IV 10.3.1, and actions were not taken until November 30, 1989 to determine and correct the root cause of the channel's malfunction.

This is a severity level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas Company is hereby required to submit to this office within 30 days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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Enclosure 3

ENFORCEMENT CONFERENCE MEETING SUMMARY

I. Introduction:

On December 11, 1989, an enforcement conference was held at NRC Region I to discuss the circumstances surrounding the installation of a modification in both Salem units in 1987 which introduced a single failure vulnerability in the emergency core cooling system (ECCS), and the adequacy of related unreviewed safety question determinations. The enforcement conference was held to discuss the cause of the event, the licensee's corrective actions, and the safety significance of the problem. In addition, the licensee's previous and current programs for reviewing, approving, and implementing design changes, and the effectiveness of the onsite review committee were discussed. Following the enforcement conference, the licensee discussed their policy regarding entry into Technical Specification (TS) 3.0.3.

II. Meeting Attendees:

NRC

W. F. Kane, Director, Division of Reactor Projects, Region I
J. C. Linville, Jr., Projects Branch Chief, Region I
P. D. Swetland, Chief, Reactor Projects Section 2A
K. Halvey Gibson, Senior Resident Inspector, Salem
J. C. Stone, Salem Project Manager
S. M. Pindale, Resident Inspector, Salem
D. J. Holody, Jr., Enforcement Officer, Region I
P. D. Kaufman, Project Engineer
A. L. Della Greca, Reactor Engineer

Public Service Electric and Gas

T. M. Crimmins, Vice President, Nuclear Engineering
S. LaBruna, Vice President - Nuclear Operations
L. K. Miller, General Manager - Salem Operations
J. P. Ronafalvy, Manager - Nuclear Engineering Services
B. Preston, Manager, Licensing and Regulations
F. Thomson, Assistant to General Manager - Salem
V. J. Polizzi, Operations Manager - Salem
P. O'Donnell, Salem I&C Supervisor
J. V. Bailey, Engineering Assessment Group Supervisor

Others

R. R. Reichel, Engineer, Delmarva Power
K. M. Budoenbohn, Engineer, Delmarva Power

III. Meeting Presentation and Discussion

NRC Region I presented the findings of Special Inspection Report No. 50-272/89-25 including the details of potential violations regarding the failure to identify that DCRs 1EC-2295 for Unit 1 and 2EC-2295 for Unit 2 contained an unreviewed safety question. The DCRs introduced a potential single failure which could have jeopardized the ability of the ECCS systems to perform their safety function in the event of a loss of coolant accident (LOCA), and the Site Operations Review Committee (SORC) failed to identify that proposed changes to EOPs contained the same unreviewed safety question in that the changes reestablished the single failure vulnerability during the accident sequence.

The licensee presented information relative to the specific modification and modification process in 1987, the current modification process, the safety significance of the single failure vulnerability, the deficiency evaluation process, and short and long term corrective actions. The presentation and subsequent discussion addressed the following:

- The safety significance was minimal based on PRA data and LOCA analyses.
- Due to the peculiarity of the system design, this event is an isolated case.
- The licensee plans to modify the circuit during subsequent refueling outages to remove the single failure vulnerability.
- The overall SORC review process is effective based on audit results and independent reviews.

The licensee's presentation materials are attached to this summary.

IV. Conclusions

The NRC determined that the licensee identified violation would not be cited for the failure to identify that the circuit modification in 1987 contained an unreviewed safety question. However, a violation would be cited for the failure to identify that related EOP changes contained the same unreviewed safety question.