

Public Service
Electric and Gas
Company

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MAY 14 1990
NLR-N90100

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

Gentlemen:

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-272/90-05 AND 50-311/90-05
DOCKET NOS. 50-272 AND 50-311

Public Service Electric and Gas Company (PSE&G) has received the subject Inspection Report dated April 4, 1990 which included a Notice of Violation for two events. PSE&G did not receive this report for more than a week after it was issued. Consequently, an extension from the May 4, 1990 response due date to May 12, 1990, was subsequently obtained after discussions with Mr. Ronald Nimitz of Region I. Pursuant to the requirements of 10CFR2.201, the PSE&G response to this Notice of Violation is provided in the attachments to this letter.

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

Sincerely,



Attachments

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PDR ADOCK 05000272
Q PDC

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C Mr. J. C. Stone
Licensing Project Manager

Mr. T. Johnson
Senior Resident Inspector

Mr. T. Martin, 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

NRC Notice of Violation dated April 4, 1990, identified two violations. The violations and PSE&G's responses are provided below.

APPENDIX A NOTICE OF VIOLATION

Salem Technical Specification 6.8.1 requires that procedures be established, implemented and maintained including applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978. Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978, recommends that procedures be written to cover the plant fire protection program and the control of modification work.

1. Nuclear Administrative Procedure Number 8 (NAP-8), "Design Change, Test and Experiment Program," requires the Station Operations Review Committee (SORC) to review all Design Change Packages, prior to their implementation, for 10CFR50.59 concerns in accordance with the provisions of section 6.0 of the Technical Specifications.

Contrary to the above, as of February 13, 1990, a design change was in place for both Salem diesel fire pumps, but no Design Change Package had received a 10CFR50.59 safety evaluation or SORC review.

RESPONSE

PSE&G does not dispute the violation.

The design change referred to in the subject Notice of Violation is the disabling of the automatic test feature included within the the diesel fire pumps start circuitry. The test circuitry, as originally installed, initiated a start of the diesel fire pumps on a weekly basis through a timer. This automatic feature is a requirement per National Fire Protection Association (NFPA) 20 which the pumps were procured to.

PSE&G has determined that this circuitry was disabled more than ten years ago and probably disabled prior to Licensing of the units. However, this cannot be verified. The disabling of the automatic test feature did not affect the valid initiation signals that the pumps would be expected to respond to.

Testing of the diesel fire pumps has been administratively controlled through appropriate technical specification surveillance procedures. This testing achieves the same results as an automatic test feature.

1. Corrective actions taken

- o A safety evaluation per 10CFR50.59 has been performed and a temporary modification package has been initiated to document the configuration change.
- o A Safety Analysis Report (SAR) change notice has been processed and will be incorporated into Revision 10 to the SAR which will be issued in July, 1990.
- o A permanent Design Change Package will be developed to formalize the revised design

2. Corrective actions taken to avoid further violations

PSE&G believes that this type of event would not occur today. This modification was not processed in a manner that is considered appropriate today. In the ten years since this modification took place, a very detailed and effective design change process has evolved. Safety evaluation screening criteria are applied to all modifications and specialty review checklists are used to assure all items are carefully considered. These procedural requirements are now considered routine and covered in key administrative procedure control of design and configuration change, test and experiments (NC.NA-AP.ZZ-0008(Q)).

3. Date when full compliance will be achieved

Full compliance has been achieved.

APPENDIX A NOTICE OF VIOLATION

1. Administrative Procedure Number 25 (AP-25), "Fire Protection Program," requires that combustibles resulting from work activities shall be removed from the work area immediately following work completion or at the end of each shift.

Contrary to the above, on March 15, 1990, combustible wooden cable protectors were found in three separate Salem safety related areas, and had not been removed following the work completion or at the end of each shift.

RESPONSE

PSE&G does not dispute the violation.

The root cause of the subject violation is non-adherence to station procedures. As mentioned in section 7.1C of Inspection Report 272/90-05, the material did not exceed the allowable contribution of transient combustibles for the cited areas. The material found in the safety injection pump room and mezzanine area was not visible without climbing in the areas upper elevations. It is concluded that this material was inadvertently left in the areas and was not visible during routine inspections. However, procedure AP-25 "Fire Protection Program" does not allow for material to be inadvertently left in areas.

1. Corrective actions taken

- o The material was removed from the safety injection pump room and mezzanine area, the relay room was left as found to facilitate on going work, however, the area was impaired.
- o Evaluations of the amount of material left in the areas determined that no limit was exceeded.
- o Personnel within the Site Protection Organization who perform inspections of these areas transient fire loads have received instruction to provide extra attention to transient combustible loading. Walk-down of vital areas are performed on a daily basis and findings are documented to management.
- o Appropriate personnel were counseled and coached as to the station requirements with procedure adherence. In addition, the General Manager - Salem Operations issued a letter to all station employees on the significance of this event and the need to comply with the requirements at AP-25.

2. Corrective actions taken to avoid further violations

- o Station procedure AP-25 "Fire Protection Program" is currently being revised. The new revised AP will provide for better management control of transient fire load and combustible materials.
- o A walk-down of vital areas for transient fire loads will be performed to ensure that all combustible materials not associated with an ongoing activity or that is not impaired is removed from the area. This walk-down will be completed by August 31, 1990

3. Date when full compliance will be achieved

Full compliance has been achieved.