

Public Service
Electric and Gas
Company

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Vice President and Chief Nuclear Officer

FEB 05 1993

NLR-N93013

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

Gentlemen:

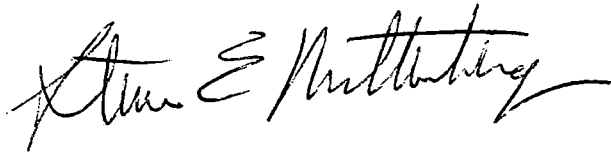
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-272/92-16, 50-311/92-16
SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311

Public Service Electric & Gas Company (PSE&G) has received the Inspection Report dated December 16, 1992. Within the scope of this inspection, one apparent violation of NRC requirements was identified. The violation concerns failure to provide prompt corrective actions with respect to a battery room fire damper.

Pursuant to the requirements of 10CFR2.201, PSE&G hereby submits its response to the notice of violation.

Should you have any questions in regard to this submittal, please do not hesitate to contact us.

Sincerely,



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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
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CN 415
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ATTACHMENT

As a result of the inspection at Salem Station during October 26-30, 1992, and in accordance with the "General Statement of Policy and Procedure for Enforcement Actions" 10CFR Part 2, Appendix C, 1992, the following violation was identified:

10CFR50, Appendix B, Criterion XVI, corrective actions states, in part that "measure shall be established to assure that conditions adverse to quality, such as failures, malfunctions... defective equipment and nonconformances are promptly identified and corrected..."

Contrary to the above, on October 29, 1992, the ventilation damper (1VHE839) of the "C" battery room failed to stay open to provide proper ventilation. The damper had been in the closed position since March 8, 1991. This deficiency was identified by the licensee on August 29, 1991. Adequate ventilation is required to prevent hydrogen accumulation from reaching the ignition limit.

PSE&G DOES NOT DISPUTE THE VIOLATION

ROOT CAUSE

The root cause of the violation was attributed to inadequate assessment of the potential safety concerns associated with the closed battery room fire damper. A contributing factor to this violation was the failure to communicate the significance of the potential safety concerns associated with the closed battery room damper to the site services and fire protection departments.

Although the notice of violation stated that the deficiency was identified in August, 1991, a work request was generated on March 12, 1991 to repair the fusible link in the battery room door. The assessment of the personnel involved was that the fire damper was closed and there was no fire barrier impairment. The exhaust system was operating and no ventilation problem was noted. Therefore, the work request was assigned a low priority. It was not understood that even though the exhaust system was in service, the inlet plenum had been blocked. The door had been targeted for replacement under the Salem Fire Damper Upgrade Project; therefore, the repairs were not pursued.

In April, 1992, an engineer involved in a review of the ventilation system for Salem noted the closed battery room damper and initiated a Discrepancy Evaluation Form (DEF) to evaluate the effects of the closed damper on the ventilation system. The DEF was closed on the basis that material deficiencies are corrected by work orders. The DEF did not assess the safety significance of the closed damper or identify the need to address the work order immediately to alleviate the ventilation concern. The DEF was returned to the Originator's Manager for review prior to close out. At the time that the DEF was closed, several work requests had been generated to repair the fire damper fusible link. However, there was a failure of communications between E&PB Engineering, System Engineering, and Site Services to ensure that the concern was being addressed properly.

An assessment by Engineering conducted in October, 1992 indicated that there was sufficient bypass flow around the door to prevent a safety hazard.

CORRECTIVE ACTIONS TAKEN

On October 30, 1992, the Fire Protection Department was notified that the closed damper created a concern that the ventilation flow rate was insufficient to ensure hydrogen would not buildup in the battery room. Based on the identified concern, the damper was secured in the open position. The open damper created a fire barrier impairment which was tracked in accordance with the appropriate administrative controls. On January 8, 1993, the fusible links were replaced and the damper was restored to operable.

CORRECTIVE ACTIONS TAKEN TO PREVENT RECURRENCE

In order to prevent recurrence, the following actions have been initiated:

The violation will be reviewed with appropriate site maintenance and fire protection department personnel. Personnel will be reminded of the necessity to ensure proper ventilation whenever a damper is impaired.

The expectations to ensure resolutions identified in a DEF have been properly addressed will be reviewed with the Engineering personnel involved in processing the DEF and other appropriate Engineering personnel.

The expectations to ensure proper prioritization of work orders will be reviewed with the Site Services personnel involved in processing the battery room fire damper work orders and other appropriate Site Services personnel.

Site maintenance and fire protection personnel are conducting a review of open and rejected work requests and work orders to identify material deficiencies which are not getting proper attention.

NC.DE-AP.ZZ-0018(Q) Engineering Discrepancy Control procedure will be reviewed to determine if additional clarifications are required.

All actions identified will be completed by March 31, 1993.

PSE&G IS IN FULL COMPLIANCE.