

Public Service
Electric and Gas
Company

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Vice President - Nuclear Operations

OCT 13 1993

NLR-N93160

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

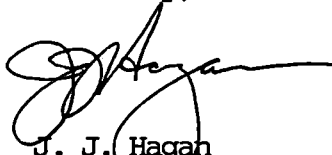
REVISED REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-272 & 311/93-08 AND 50-354/93-06
SALEM AND HOPE CREEK GENERATING STATIONS
DOCKET NOS. 50-272, 50-311 AND 50-354

Public Service Electric and Gas Company (PSE&G) has received your letter dated August 30, 1993 requesting that PSE&G provide a revised response to the Notice of Violation transmitted in the subject Inspection Report. During a telephone conversation with Mr. J. White (NRC), a response due date of October 13, 1993 was agreed upon.

Pursuant to the provisions of 10CFR2.201, PSE&G hereby submits its revised response to the Notice of Violation. This revised response supersedes our previous response letter dated June 7, 1993 in its entirety.

Should you have any questions on this transmittal, please contact us.

Sincerely,



J. J. Hagan
Vice President -
Nuclear Operations

Attachment

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OCT 13 1993

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ATTACHMENT

Introduction

The subject Notice of Violation (NOV) was identified in combined NRC Inspection Report 272/93-08, 311/93-08 & 354/93-06 dated May 5, 1993. The NOV cited three examples where the requirements of 10CFR50.59 were not fully met. In a letter dated June 7, 1993, PSE&G responded to the NOV. By letter dated August 30, 1993 the NRC notified PSE&G that the response to example #2 was acceptable, however, a revised response was required for examples #1 and #3. This letter provides a revised response to examples #1 and #3. PSE&G's response to example #2 remains the same and has been reiterated here. This letter constitutes our revised response to the Notice of Violation and supersedes our initial response letter dated June 7, 1993 in its entirety.

Notice of Violation

10CFR50.59 (B)(1) states, in part, that records of changes to the facility as described in the Updated Final Safety Analysis Report (UFSAR) "...must include a written safety evaluation which provides the basis for the determination that the change, test, or experiment does not involve an unreviewed safety question."

Contrary to the above, the licensee made the following changes to the facility as described in the UFSAR and did not provide written safety evaluations providing the basis for a determination that an unreviewed safety question was not involved.

1. Hope Creek Deficiency Report HTE 92-230 documented a use-as-is disposition for unqualified gauges in the gland seal portion of the High Pressure Coolant Injection (HPCI) system, including changing the normal position of the isolation valves for these gauges from open to closed, which changed the facility as described in UFSAR Figure 6.3-2 because it shows the gauges within the safety-related boundary and the isolation valves as being normally open.
2. Salem Unit 1 Temporary Modification TMR 92-031 provided temporary power from the 1C vital bus (normal power is from the 1B vital bus) to the Salem 1 No. 12 Auxiliary Building Fan, which changed the facility as described in Tables 8.3-2, 8.3-3, and Figure 8.3-4A in the UFSAR.
3. Salem Unit 2 Temporary Modification TMR 92-043 installed a temporary blank flange in the Service Water system upstream of manual isolation valve 22SW414, which changed the facility as shown on Figure 9.2-1B in the UFSAR.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY (PSE&G) DOES NOT DISPUTE THE VIOLATION.

Reason for the Violation

1. Deficiency Report HTE 92-230

The originally installed pressure gauges needed replacement. PSE&G's Managed Maintenance Information System (MMIS) listed the subject pressure gauges as safety related, although the part number indicated non-safety related. The vendor (GE) was contacted in an attempt to procure safety related gauges. They stated that they do not make safety related gauges for that application. The non-safety related pressure gauges were installed during the 4th refueling outage to support system testing, and were left in-place. Hope Creek Deficiency Report (DR) 92-230 was written to address this issue. The DR was dispositioned "use-as-is" with the root valves maintained in the closed position.

The accompanying 10CFR50.59 applicability review determined that the gauges did not change the facility as described in the SAR. This was based on the review of a number of Hope Creek UFSAR sections, including Section 6.3.2.2.1. This section states that failure of the gland seal portion of the High Pressure Coolant Injection (HPCI) system (of which these gauges are a part) will not prevent the HPCI system from fulfilling its core cooling objective.

However, the review conducted did not identify and document two other UFSAR sections that further describe the subject gauges. UFSAR Table 3.2-1, Part V.c.10, Note 10, identifies these root valves and instrument lines (and therefore the gauges) as Quality Group D (non-safety-related). This is consistent with Section 6.3.2.2.1. However, UFSAR Figure 6.3-2 depicts these gauges as being within the "Q" (safety-related) boundary and indicates the root valves are normally open. This is inconsistent with Section 6.3.2.2.1 and Table 3.2-1 and represents a discrepancy within the UFSAR.

The use-as-is disposition of the DR represented a change to the facility as it is described in Figure 6.3-2 (non-safety related gauges instead of safety-related gauges and root valves changed from open to closed). Therefore, in accordance with our procedures, the applicability review should have resulted in a safety evaluation.

2. Temporary Modification TMR 92-031

Salem Unit 1 Temporary Modification (T-Mod) TMR 92-031 provided temporary power from the 1C Vital Bus to 12 Auxiliary Building Supply Fan (normal power is from 1B Vital Bus). This T-Mod was similar to a previous T-Mod, TMR

92-005, which provided temporary power from the 1C Vital Bus to 12 Fuel Handling Building Exhaust Fan, No.1 Battery Room Exhaust Fan, and No.1 Radiation Monitor Sample Pump (normal power is from 1B Vital Bus).

The same engineer processed both T-Mods. TMR 92-005 was evaluated as a change to the facility as described in the SAR; it received SORC review and approval. The author believed that TMR 92-031 involved the same issues and referenced the previous T-Mod (TMR 92-005) for a discussion of cable separation concerns. A copy of TMR 92-005 was attached to TMR 92-031. Since TMR 92-005 was SORC approved with no unreviewed safety question (USQ) identified, the author surmised that he could reference the previous T-Mod and disposition TMR 92-031 as no change to the facility as described in the SAR.

This conclusion is clearly incorrect. Each 50.59 review must be independently completed.

3. Temporary Modification (T-Mod) TMR 92-043

T-Mod TMR 92-043 documented the installation of a temporary blank flange within a Service Water (SW) header tagged out for maintenance. The background on this T-Mod is as follows:

On June 11, 1993 a portion of pipe in the Salem 22 service water (SW) chiller return header was leaking and in need of replacement. (See attached figure). This pipe was upstream of isolation valve 22SW414. Two chiller condensers were required to maintain operability of the Emergency Control Room Air Conditioner (ECAC). This meant that, in addition to Chiller Condenser 23, either Chiller Condenser 21 or 22 was required to be in operation. In order to maintain Chiller Condenser 21 or 22 in operation, (with Chiller Condenser 23 operating) a blank flange was installed upstream of isolation valve 22SW414 between existing break flanges. Our previous response stated that the blank flange merely supplemented the closed isolation valve (22SW244) for SW header separation. However, that information was miscommunicated. The blank flange and valve 22SW414 served as isolation points for the leaking section of pipe. The cognizant engineer prepared T-Mod TMR 92-043 to document installation of the temporary blank flange in the SW system.

A documented 10CFR 50.59 applicability review was performed for T-MOD TMR 92-043 as required by PSE&G procedures. The applicability review concluded that installation of a blank flange in the SW system was not a change to the facility as described in the UFSAR. This was based on considering the blank flange installation to be in support of maintenance.

PSE&G Administrative Procedure NC.NA-AP.ZZ-0059(Q) (NAP-59) establishes the process whereby PSE&G meets the requirements of 10CFR50.59. NAP-59, Section 6.2.4 states that

maintenance activities "normally do not require a safety evaluation." The installation of the blank flange was considered to be a maintenance activity based on the following:

The blank flange was installed to support maintenance (pipe replacement). The blank flange was installed per ASME Code requirements and performed the same function as closed valve 22SW414. (There were no components, other than a closed drain valve, between the blank flange and valve 22SW414). When the piping replacement was completed, the blank was removed. In interpreting the blank flange installation to be a maintenance activity, the applicability review concluded that a safety evaluation was not necessary.

However, NAP-59, Section 6.2.1 indicates that temporary design changes involving disconnected piping or removal of components should be considered a "change." Since Salem UFSAR Figure 9.2-1B, Sheet 5 depicts this section of the Service Water system, the applicability review should have resulted in a safety evaluation.

It should be noted that the information included in the documented applicability review would have been used as supporting information in a safety evaluation if one had been written.

Corrective Action Taken

1. The 50.59 applicability review for DR HTE 92-230 has been revised to reference the two additional UFSAR sections (Table 3.2-1 and Figure 6.3-2). Since the use-as-is disposition of the DR represents a change to the facility as it is described in Figure 6.3-2, (non-safety related gauges instead of safety-related gauges and root valves changed from open to closed) a 10CFR50.59 safety evaluation has been performed and concluded that the configuration change does not represent an unreviewed safety question. Also an engineering change has been implemented to make UFSAR Figure 6.3-2 consistent with the remainder of the UFSAR.

Lessons learned from this example have been rolled down to department system engineers to ensure they are aware of the requirements and management expectations.

2. With regard to T-MOD TMR-031, the appropriate department manager counseled the author on the 50.59 process and stressed why his action was unacceptable. We conducted a review of previously completed 50.59s to identify any similar instances. The review concluded that this example was not safety significant and was an isolated incident involving one plant engineer.

This incident has been discussed with all department engineers, to ensure they are aware of the requirements and management expectations.

3. With regard to T-MOD TMR 92-043, the blank flange was removed upon replacement of the leaking pipe and the condition no longer exists.

The lessons learned from this will be discussed with department system engineers to ensure they are aware of the requirements and management expectations.

Corrective Actions to Prevent Recurrence

PSE&G considers these three examples as unique instances of 10CFR50.59 implementation shortcomings. These three examples will be forwarded to the Nuclear Training Department to use as examples in the 10CFR50.59 training module. The training module will also address circumstances where conflicting statements or figures exist within the UFSAR.

Status of Compliance

PSE&G is in full compliance.

FIGURE DEPICTING INSTALLATION OF BLANK FLANGE

(Example #3)

PART 2 - MODIFICATION AND TESTING
FORM NC.DE-WB.ZZ-0001-9
SECTION 6.0
PICTOGRAM

CHANGE NO.: -
T-MOD NO.: 92 - 043
PACKAGE NO.:
CP REV. NO.:

SECTION PAGE NO.: 1

SECTION REV. NO.: 0

