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Docket Nos. 50-272
50-311
50-354
EA No. 94-003

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

Dear Mr. Miltenberger:

**SUBJECT: SALEM AND HOPE CREEK RESIDENT INSPECTION NOS. 50-272/93-23;
50-311/93-23; 50-354/93-25**

The enclosed report documents an inspection to assure public health and safety, conducted by Mr. C. Marschall, Senior Resident Inspector and other members of the NRC resident and regional staff at the Salem and Hope Creek Generating Stations for the period between October 17, 1993 and November 27, 1993. The inspectors discussed the findings of this inspection with Messrs. C. Vondra and R. Hovey of your staff.

Based on the results of this inspection, a violation was identified and is set forth in Appendix A, Notice of Violation. The violation refers to the long-standing failure to consider each emergency diesel generating unit inoperable and initiate the required actions specified by technical specifications whenever one of the two redundant air start systems available for each engine was isolated for routine surveillance. We have considered this apparent violation as Severity Level IV since only two of three diesels are required for operation of emergency core cooling and associated safety functions, each diesel is supported by dual air start systems, and a single air start system has been demonstrated sufficient to start an emergency diesel. You are required to respond to this letter relative to this matter, and should follow the instructions specified in the enclosed Notice when preparing your response. Your response should document the specific actions taken and any additional actions you plan to prevent recurrence. Upon review of your response, we will determine if further NRC enforcement action is necessary.

During this inspection we also noted numerous examples of failure to follow procedures relative to the control of maintenance work activities. These examples are detailed in the inspection report and summarized in Appendix B to this letter. Your failure to effectively assess these occurrences, determine root cause and establish appropriate corrective measures to prevent recurrence appears to be a factor that contributed to the repeated instances of failure to control work activities. It was not apparent that your staff recognized or considered the generic deficiency in performance that these examples demonstrated, or

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initiated any effective corrective action. Similar weaknesses were noted during the last Systematic Appraisal of Licensee Performance (SALP) of Salem relative to deficiencies in the application and approach to root cause analysis for certain abnormal conditions and situations, and the consequent ineffectiveness of assessment and corrective efforts. Further, though none of these events significantly affected plant safety, we are concerned that the potential existed for more serious consequences, particularly with regard to personnel safety.

Due to the numerous examples and the recurrent nature of this type of finding, we are considering these items for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions (Enforcement Policy), 10 CFR Part 2, Appendix C. Accordingly, a Notice of Violation relative to these findings will not be issued at this time. The number and characterization of the apparent violations described in the enclosed inspection report and the attached summary may change as a result of further NRC review and assessment.

On January 5, 1994, Messrs. Wenzinger and White discussed this matter with you in a telephone conversation. Accordingly, an enforcement conference was scheduled for February 1, 1994, 10:00 a.m., at the NRC Region I office. The purposes of this conference are to: discuss the apparent violations, including causes and safety significance; provide an opportunity for you to present your proposed corrective actions; and discuss any other information that will help us determine the appropriate enforcement action in accordance with the Enforcement Policy. Accordingly, you should be prepared to present your own assessment of the cause(s) of these deficiencies and describe how your proposed corrective measures will be effective relative to these specific cases and the general conduct of other plant activities. You should also be prepared to discuss the application and expectation (if any) of the Safety Review Group or other Quality Assurance activity, and any improvements, taken or planned relative to such efforts. No response relative to this matter is required at this time. In accordance with NRC policy, this conference will be closed to public observation.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice, a copy of this letter and its enclosures will be placed in the NRC Public Document Room. The responses directed by this letter and the enclosed Notice of Violation are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96.511.

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Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Richard W. Cooper, Director
Division of Reactor Projects

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Summary of Apparent Examples of Deficient Performance
3. NRC Inspection Report Nos. 50-272/93-23; 50-311/93-23; 50-354/93-25

cc w/encls:

S. La Bruna, Vice President - Nuclear Engineering
J. Hagan, Vice President - Nuclear Operations
C. Vondra, General Manager, Salem Operations
R. Hovey, General Manager, Hope Creek Operations
C. Schaefer, External Operations - Nuclear, Delmarva Power & Light Co.
F. Thomson, Manager, Licensing and Regulation
J. Robb, Director, Joint Owner Affairs
A. Tapert, Program Administrator
R. Swanson, General Manager, Quality Assurance and Nuclear Safety Review
M. Wetterhahn, Esquire
R. Fryling, Jr., Esquire
P. Curham, Manager, Joint Generation Department, Atlantic Electric Company
Consumer Advocate, Office of Consumer Advocate
William Conklin, Public Safety Consultant, Lower Alloways Creek
K. Abraham, PAO (2)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New Jersey

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Mr. Steven E. Miltenberger

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bcc w/encls:

- T. Martin, RI
- Region I Docket Room (with concurrences)
- D. Holody, Enforcement Officer, RI
- R. Cooper, DRP
- J. White, DRP
- E. Wenzinger, DRP

bcc w/encls via E-Mail:

- J. Stone, NRR
- S. Dembek, NRR
- V. McCree, OEDO
- C. Miller, PDI-2, NRR
- J. Lieberman, OI
- J. Goldberg, OGC
- T. Murley, NRR
- L. Callan, NRR
- E. Jordan, AEOD
- M. Shannon, ILPB

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 DRP:RI
 CMarschall

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 JWhite

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 RCooper

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*Note: The content and form
 of Appendix B was discussed
 with S. Gray, OE on 1/10/94
 J White*

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