

Public Service
Electric and Gas
Company

Joseph J. Hagan

Public Service Electric and Gas Company

P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1200

Vice President - Nuclear Operations

MAY 18 1994

NLR-N94095

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

Gentlemen:

RESPONSE TO NRC'S NOTICE OF VIOLATION
INSPECTION REPORT 50-272/94-06; 50-311/94-06
DOCKET NOS. 50-272; 50-311

Public Service Electric and Gas (PSE&G) has received the NRC Inspection Report 50-272/94-06, 50-311/94-06, dated April 10, 1994. Within the scope of this report, a Salem Unit 2 Technical Specification Action Statement 3.4.5 violation was identified.

Accordingly, in the attachment to this letter, PSE&G submits its assessment and response to the identified violation.

Should you have any questions regarding this transmittal, please do not hesitate to contact me.

Sincerely,



9405310010 940518
PDR ADCK 05000272
PDR

JE011/

MAY 18 1994

Document Control Desk
NLR-N94095

2

Attachment (1)

C Mr. J. C. Stone, Licensing Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. C. S. Marschall (S09)
USNRC Senior Resident Inspector

Mr. T. T. Martin, Administrator - Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Kent Tosch, Manager, VI
New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

REF: NLR-N94095

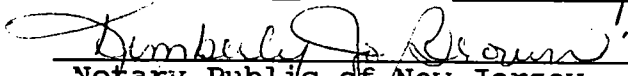
STATE OF NEW JERSEY

COUNTY OF SALEM

)
) SS.
)

J. J. Hagan, being duly sworn according to law deposes and says:
I am Vice President - Nuclear Operations of Public Service
Electric and Gas Company, and as such, I find the matters set
forth in the above referenced letter, concerning the Salem
Generating Station, Unit Nos. 1 and 2, are true to the best of my
knowledge, information and belief.


Subscribed and Sworn to before me
this 18th day of May, 1994


Notary Public of New Jersey

My Commission expires on _____

KIMBERLY JO BROWN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 21, 1998

PSE&G RESPONSE

PSE&G does not dispute the violation.

The root cause of this violation has been attributed to inadequate procedural guidance.

On March 25, 1994, Salem 1 operating personnel were in the process of identifying the source of Reactor Coolant System (RCS) inleakage to the Pressurizer Relief Tank (PRT). Both Power Operated Relief Valve (PORV) block valves were closed in accordance with Abnormal Operating Procedure (AOP) S2.OP-AB.PZR-0001 (Q), Pressurizer Pressure Malfunction. Although the procedure directed the operators to close both block valves, it did not alert the operators to enter Technical Specification (T/S) 3.4.5 following completion of the action. It was not until review of the procedure technical basis that it was determined that the T/S applied.

Operating shift personnel were cognizant of T/S 3.4.5 requirements, and its associated T/S Interpretation (2-LCO-3.4.5). Neither document clearly required that the PORVs be considered inoperable with their associated block valves closed.

Operating personnel also did not consider the PORVs inoperable since they were following AOP procedural requirements, and the block valve could be opened if needed. An operator was stationed at the valve controls to open the valve, if required. The PORVs are designed to minimize challenges to the Pressurizer safety relief valves. However, no credit is taken for automatic operation of these valves during Design Basis Accidents.

PSE&G would like to clarify an apparent misunderstanding as it relates to management expectations regarding Technical Specifications compliance. Specifically as stated on page 2 of Inspection Report 50-272/94-06, and 50-311/94-06; "...Operations management concluded that it was reasonable to permit the control room operators to complete troubleshooting since they had already failed to meet the regulatory requirement".

PSE&G management does not condone any course of action other than compliance with requirements of Technical Specifications. Once it has been identified and determined that a condition exists, which violates Technical Specification requirements, the action statement is to be entered immediately regardless of the amount of time that the non compliance has existed.

NOTICE OF VIOLATION

Public Service Electric and Gas Company Docket No: 50-311
Salem Nuclear Generating Station License No: DPR-75
Unit 2

During an NRC inspection conducted on February 20 - March 26, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violation is listed below:

Salem Unit 2 Technical Specification 3.4.5 Action a. requires, in part, that in modes 1, 2, and 3 with one or more power operated relief valves (PORVs) inoperable, within 1 hour either restore the PORVs to operable status or close the associated block valves and remove power from the block valves; otherwise, be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

Contrary to the above, on March 25, 1994, at 3:32 a.m., Salem Unit 2 operators closed the PORV block valves making the PORVs inoperable, did not reopen the block valves to restore operability or remove power from the block valves within one hour, and did not put the unit in hot standby within the next six hours.

This is a Severity Level IV violation (Supplement I).

**CORRECTIVE STEPS TAKEN AND CORRECTIVE STEPS TAKEN TO PREVENT
AVOID FUTURE VIOLATIONS**

Operations Department management:

1. Reviewed this event with involved Operations personnel.
2. Informed all operators, via entries in the Night Order Book on March 25, 1994 and re-enforced on March 31, 1994, of the requirement to enter T/S 3.4.5 whenever the PORV block valve(s) are closed.
3. Will review the need to modify T/S Interpretation 2-LCO-3.4.5, during implementation of License Amendment Nos 150 and 130. This amendment allows closure of the PORV block valves without having to remove power from the block valves.
4. Will modify Abnormal Operating Procedure (AOP) S2.OP-AB.PZR-0001 to ensure appropriate Technical Specification references are included whenever the PORV block valve(s) are closed.

This event will be reviewed for lessons learned in licensed operator requalification training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PSE&G believes that adequate controls are in place to ensure continued operability of the Power Operated Relief Valves. PSE&G is in full compliance.