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94-80

JUL 6 1994

EA No. 94-112
Docket Nos. 50-272
50-311

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

Dear Mr. Miltenberger:

SUBJECT: APPARENT VIOLATIONS RELATIVE TO THE APRIL 7, 1994 EVENT

The NRC inspection findings relative to the circumstances surrounding the April 7, 1994, partial loss of plant circulating water flow and subsequent plant trip and safety injections, were detailed in the Augmented Inspection Team (AIT) Report 94-80, provided to you by our letter, dated June 27, 1994. Further discussion of several of those findings is addressed in NRC Inspection Reports 94-11 and 94-13. These reports identify findings that we consider important to the safe operation of the Salem units, and either contributed to or complicated recovery from this event, or were indicative of weak management controls of important plant activities.

The April 7th event is of concern to the NRC since it resulted in multiple challenges to the Salem operators and plant safety systems. The control room command function was transferred or relinquished for pivotal parts of the event, and appropriate actions to counter the reactor cooldown in progress and prevent the ensuing safety injection transients did not occur. Longstanding equipment deficiencies that also led to, and complicated the event, specifically, the atmospheric relief valve controls and steam line flow sensors, were tolerated and corrective actions were not aggressively pursued. Communications with the NRC during the early stages of the event were ineffective in characterizing the significance of the transient, including the scope of equipment failures, the causes of safety system initiations, the resultant condition of the plant, and the planned recovery efforts. Further, procedures for dealing with the abnormal plant conditions (namely, grass intrusion, rapid power reduction, and recovery from a water-filled pressurizer or "solid plant" condition) were inadequate, insufficiently detailed, or nonexistent. Finally, design and material controls were found to be inadequate, in that the pressurizer power-operated relief valve (PORV) internal component materials, although satisfactory for use, were not as specified by the design; and a solid state protection system (SSPS) logic card was subsequently determined to be of the wrong type.

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This event and the concerns outlined above are more troubling given the relative high frequency of hardware initiated events at Salem over the past four years along with recurring problems with procedural adherence, depth of root cause assessment of problems, and degree of long-term effectiveness of corrective actions.

Apparent violations, as described in the enclosure, are being considered for escalated enforcement action in accordance with "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C. Accordingly, no Notice of Violation is being issued for these inspection findings at this time. Further, the number and characterization of the apparent violations may change as a result of further NRC review.

The apparent violations and the need for an enforcement conference were discussed with you in a telephone conversation on July 6, 1994, and the conference has been scheduled in the NRC Region I office for July 28, 1994. This conference will be open to public observation in accordance with the Commission's trial program as discussed in the enclosed Federal Register notice. Although not required, we encourage you to provide your comments on how you believe holding this conference open to public observation will affect your presentation and your communications with the NRC. The decision to hold an enforcement conference does not mean that violations have occurred, or that enforcement action will be taken. The purposes of this conference are: (1) to discuss the apparent violations, including cause and safety significance; (2) to provide you with an opportunity to point out errors in our inspection report, and identify corrective actions, taken or planned; and (3) to discuss any other information that will help us determine the appropriate action in accordance with the Enforcement Policy. The conference is also an opportunity for you to provide any information concerning your perspectives on the severity of the apparent violations, and the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room. No response to this letter is required at this time, and your cooperation is appreciated.

Sincerely,

Original Signed By:
James T. WigginsJames T. Wiggins, Director
Division of Reactor Safety

Enclosures:

1. Apparent Violations Considered for Escalated Enforcement Action (Salem AIT Report 94-80)
2. Federal Register Notice (Vol. 57, No. 133, July 10, 1992); "Two-Year Trial Program for Conducting open Enforcement Conferences - Policy Statement"

cc w/encl:

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

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bcc w/encl:
Region I Docket Room (with concurrences)
Kay Gallagher, DRP
D. Holody, RI
J. Lieberman, OE
DRS File (2)

bcc w/encl: (Via E-Mail)
J. Stone, NRR
W. Dean, OEDO
C. Miller, PDI-2, NRR
M. Shannon, ILPB
M. Callahan, OCA

<i>fa</i>	<i>am</i> RI:DRS BMcDermott 7/1/94	<i>amk</i> RI:DRS EKelly 7/1/94	RI:DRP RSummers 7/1/94	<i>[Signature]</i> RI:DRP JWhite 7/1/94	<i>[Signature]</i> NRR CMiller <i>with comments</i> 7/1/94
	<i>[Signature]</i> RI:DRP RCooper 7/1/94	<i>[Signature]</i> RI:DRS JWiggins 7/1/94	<i>[Signature]</i> RI:OE DHolody 7/1/94	<i>[Signature]</i> RI:DRS WKane 7/1/94	RI:RA TMartin 7/1/94