January 23, 1995

Mr. Leon R. Eliason Chief Nuclear Officer & President Nuclear Business Unit Public Service Electric and Gas Company P. O. Box 236 Hancocks Bridge, New Jersey 08038

SUBJECT:

COMBINED INSPECTION REPORT NOS. 50-272/94-18, 50-311/94-18, AND

50-354/94-18 (REPLY)

Dear Mr. Eliason:

This letter refers to your October 13, 1994, correspondence in response to our September 7, 1994, letter regarding Salem and Hope Creek Nuclear Generating Stations. This correspondence deals with your response to the Level IV Violation regarding the inadequate test control of the 125V batteries for both stations. In your response, you agreed with the Violation for Salem Station, but you disputed the Violation for Hope Creek Station.

In your letter, you disagreed with the Notice of Violation (NOV) for Hope Creek. PSE&G claimed that since the requirement to revise the procedure acceptance criteria was both identified and controlled by PSE&G, a violation was not appropriate. We agree that your actions to correct the procedure and control its use before revision were appropriate. However, at the time of the electrical distribution system functional inspection (EDSFI), the acceptance criteria for the Hope Creek 125V battery surveillance test was not adequate, as originally stated in the inspection report.

During the EDSFI, when this issue was initially identified, the surveillance procedure acceptance criterion failed to adequately incorporate the acceptance limits as indicated by Calculation E-4.2 (Q), dated December 8, 1991. The December 8, 1991, version of Calculation E-4.2 (Q) indicated that the minimum required voltage at the 125V battery switchgear was 105V, and did not include the voltage drop from the battery terminal to the battery switchgear. This inadequate acceptance criterion within the surveillance procedure was confirmed by your Revision 3 to Calculation E-4.2 (Q). Therefore, the acceptance criterion, presented in the surveillance procedure at the time this issue was initially identified, was inadequate to ensure that the 125V battery would have been capable of supplying the necessary voltage to assure safety-related equipment functionality required for accident mitigation, and is a Violation of Appendix B, Criterion XI, "Test Control," as stated.

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We have reviewed the corrective actions for both stations associated with this Violation, and reasons why your engineering staff failed to adequately address the acceptance criteria for Salem procedures after a similar problem was identified at Hope Creek, provided in your October 13, 1994, letter. We have determined that the planned and completed corrective actions, as stated, were appropriate. Your corrective actions will be examined during future inspections of your licensed program.

The NRC has concluded that the Violation for Hope Creek occurred as stated, and an adequate basis for withdrawing the Violation was not provided. Based on your response, as provided in your October 13, 1994, letter, no additional response is required.

Sincerely,

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James T. Wiggins, Director Division of Reactor Safety

Docket Nos. 50-272 50-311 50-354

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. Buricelli, General Manager - Information Systems & External Affairs

R. Hovey, General Manager - Hope Creek Operations J. Summers, General Manager - Salem Operations

J. Benjamin, Director, Quality Assurance & Safety Review

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