Public Service
Electric and Gas
Company

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United States Nuclear Regulatory Commission
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Washington, DC 20555

Gentlemen:

GENERIC LETTER 89-04
INSERVICE TESTING PROGRAM
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

By letter dated October 3, 1989 (ref: NLR-N89196), Public Service Electric & Gas Company (PSE&G) submitted its response to NRC Generic Letter (GL) 89-04 for Salem Unit Nos. 1 and 2. This submittal included the revised Inservice Testing (IST) Program and PSE&G's commitment to the positions stated in the Generic Letter. This submittal was revised by letters, dated February 28, 1990, March 14, 1991 and May 16, 1991, and October 12, 1993. The NRC issued their Safety Evaluation Report (SER) by letter dated October 9, 1992 and updated the SER by letter dated April 15, 1994.

A Quality Assurance audit of the Salem IST Program conducted in July, 1995, identified several deficiencies. LER 272/95-018-0, dated August 18, 1995, documented a Technical Specification 4.0.5 violation associated with instrumentation used during pump testing. The purpose of this letter is to notify the NRC that the following PSE&G commitments to GL 89-04 have not yet been properly completed.

1. In response to GL 89-04 Position 9, PSE&G stated that it would perform full flow testing on all pumps in the program. Contrary to this commitment, full flow testing of the Auxiliary Feedwater Pumps has not been performed.

2. In response to GL 89-04 Position 1, PSE&G stated that it would perform full flow testing of check valves. Several examples of check valve testing, in which the criteria identified in the procedure is less restrictive than the flow stated in the Salem Updated Final Safety Analysis Report (UFSAR), have been identified. PSE&G is continuing to investigate and correct the program as necessary.

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3. GL 89-04 Position 5, states that the purpose of the limiting value of full-stroke times is to establish a value for taking corrective action on a degraded valve before the valve reaches the point where there is a high probability of failure to perform its safety function; and that the limiting value of full stroke time should be based on the valve reference or average stroke time of the valve when it is known to be in good condition and operating properly.

   PSE&G, in its response, stated that all valves have been reviewed and assigned a design or licensing basis value. A review of the power operated valves in the IST Program identified that the limiting values were established by use of Technical Specification or UFSAR values. The assigned values were not in accordance with Position 5 of GL 89-04 in that the values assigned did not allow for detection of degradation prior to reaching the limiting value.

PSE&G is continuing to review the Salem IST Program and its implementation. Should any additional discrepancies be identified, you will be informed. PSE&G is making the necessary corrections to the IST Program and will properly complete all required testing prior to startup from the current refueling/ maintenance outages.

Should there be any questions with regard to this submittal, please do not hesitate to contact us.

Sincerely,

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