

NOTICE OF VIOLATION

Public Service Electric and Gas Company  
Salem Nuclear Generating Station  
Units 1 and 2

Docket Nos: 50-272  
50-311  
License Nos: DPR-70  
DPR-75

During an NRC inspection conducted on October 5 through November 13, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violations are listed below:

- I. 10 CFR 50.54(q) requires, in part, "A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E of this part."

The Emergency Classification Guide (ECG), Section 10, "Loss of Instrumentation/Annunciation/Communications," requires an alert declaration if "Loss of most or all (>75%) Overhead Annunciators, (excluding a scheduled test or maintenance activity for which pre-planned compensatory measures have been implemented) and 15 minutes have elapsed since the loss of annunciators."

The ECG, "Introduction and References" section, Step V.A. requires, in part, that "If the Emergency Coordinator, using his best judgment, determines an Initiating Condition has been satisfied but the specific EAL is in question, he/she should promptly classify the event in accordance with the Initiating Condition. In any event, if the plant conditions are equivalent to one of the four emergency classes ..., that classification should be declared."

Contrary to the above, an alert for a loss of annunciator event was not promptly declared as required by the ECG, "Introduction and References" section, Step V.A., on October 4-5, 1995. The operating crew recognized that the initiating condition had been satisfied by about 11:12 p.m., on October 4. The alert was declared at 1:38 a.m., on October 5.

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

- II. 10 CFR 50.54(q) requires, in part, "A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in appendix E of this part."

The licensee's NRC-approved Emergency Plan, Section 3, "Organization," Part 10.0, "Staffing Commitments" provides a commitment for minimum staffing in accordance with Supplement 1 of NUREG-0737, Table 2. Tables 3.1 and 3.2 of Emergency Plan, Section 3, details licensee staffing commitments by position. Specifically, these tables denote that the emergency response organization would be augmented by at least one electrical engineer and one mechanical engineer within about 1 hour.

Contrary to the above, on October 5, 1995, some emergency response organization positions were not staffed within about 1 hour. The electrical engineer and mechanical engineer emergency response organizations positions were not filled in the technical support center by fully qualified emergency response organization personnel until about 2 hours after the alert declaration.

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

- III. 10 CFR 50.54(q) requires, in part, "A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in appendix E of this part."

10 CFR 50, Appendix E, Section IV, Content of Emergency Plans, Subpart B, Assessment Actions requires, in part, "These emergency action levels shall be discussed and agreed on by the applicant and State and local governmental authorities and approved by the NRC."

Contrary to the above, the licensee failed to discuss and seek agreement with the State of New Jersey prior to implementing a revision to their emergency action level scheme on October 7, 1995.

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

- IV. 10 CFR 50.47(b)(8) requires that "Adequate emergency facilities and equipment to support the emergency response are provided and maintained."

The Emergency Classification Guide (ECG), Section 10, "Loss of Instrumentation/ Annunciation/ Communications," requires an alert declaration if "Loss of most or all (>75%) Overhead Annunciators, (excluding a scheduled test or maintenance activity for which pre-planned compensatory measures have been implemented) and 15 minutes have elapsed since the loss of annunciators."

Contrary to the above, on October 4-5, 1995, the control room emergency response facility equipment provided was not adequate to support the emergency response, in that design deficiencies existed in the overhead annunciator system equipment that resulted in inadequate support of the emergency classification and action level scheme. Additionally, the design deficiencies were not detected and or indicated by the overhead annunciator equipment tests in such a manner that the loss of most or all (>75%) overhead annunciators could be determined by the operators and therefore support an alert declaration. This violation applies to both Salem Unit 1 and Unit 2, since the overhead annunciator equipment is identical for both units.

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

Notice of Violation

3

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at King of Prussia, Pennsylvania  
this 31<sup>st</sup> day of January 1996.