

APPENDIX A
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 January 14, 1996 to February 24, 1996, 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:

A. Technical Specification 6.8.1 requires, in part, that licensees establish, implement, and maintain written procedures covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33 requires written procedures to control safety related surveillances and fire protection program implementation. During the inspection period, the following examples of failure to adhere to procedures occurred:

1. Salem surveillance procedure S1.OP-ST.DG-0001, 1A Diesel Generator Surveillance Test, revision 9, step 5.5.1 requires that a second operator complete Attachment 7, Independent Verification, following restoration.

Contrary to the above, on January 29, 1996, Salem Unit 1 operators performed S1.OP-ST.DG-0001 and failed to perform the required independent verification following restoration.

2. Salem surveillance procedure S1.OP-ST.DG-0002, 1B Diesel Generator Surveillance Test, revision 21, step 5.1.1 requires that an operator perform diesel generator pre-start checks in accordance with Attachment 2. Attachment 2 requires operators to notify chemistry to sample the jacket water expansion tank for potassium chromate following makeup to the tank.

Contrary to the above, on February 15, 1996, Salem Unit 1 operators performed S1.OP-ST.DG-0002 and failed to notify chemistry to sample the jacket water expansion tank following makeup to the tank.

3. Procedure NC.NA-AP.ZZ-0009, Work Control Process, revision 9, step 5.7.1.d requires workers to perform the work per the work package. Work Order 951103362, Act 1, step 4c requires verification of tagging.

Contrary to the above, on February 20, a job supervisor failed to verify tag number 098438.

4. Procedure NC.NA-AP.ZZ-0025(Q), Revision 3, "Operational Fire Protection Program," requires the Job Supervisor to inspect a work area for hotwork per the criteria established in Part 2 of the hotwork permit form and sign the permit signifying the area is safe to work, loose combustibles within a 35 foot radius have been removed, and firewatches remain in the work area for a minimum of 30 minutes after hotwork was performed.

Contrary to the above, on January 24, 1996, procedures were not implemented properly, in that, the job supervisor's work area inspection did not meet hotwork permit form criteria, combustible materials were stored within 35 feet of an ignition source being used to perform hotwork, and firewatches did not remain in a work area for a minimum of 30 minutes after hotwork had been performed.

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

- B. The Code of Federal Regulations 10 CFR 50.59(b)(1) requires, in part, that the licensee maintain records of changes in the facility and of changes in procedures made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report or to the extent that they constitute changes in procedures as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change, test, or experiment does not involve an unreviewed safety question.
 1. Contrary to the above, on February 14, 1996, workers installed temporary jumpers in the energized 125VDC control circuit for Salem Unit 1 vital bus 1B without adequately determining if the jumpers modified the plant as described in the Safety Analysis Report.
 2. Contrary to the above, some time prior to February 15, 1996, the licensee changed the diesel generator jacket water expansion tank makeup system, as described in the safety analysis report, and failed to perform a written safety evaluation which provides the bases for the determination that the change did not involve an unreviewed safety question.
- C. The Code of Federal Regulations 10 CFR 50, Appendix B, Criterion XVI requires that licensees promptly correct conditions adverse to quality and take action to preclude recurrence. During the inspection period, the following examples of inadequate corrective action was identified.
 1. Contrary to the above, on February 20, 1996, the licensee failed to prevent recurrence of radiation worker failures to adhere to radiation protection program requirements.

2. Contrary to the above, on January 24, 1996 and before, adequate corrective actions were not taken in that, a fifth fire event occurred involving plasma cutting of coal-tar lined service water piping and measures had not been established considering internal operating experience data from four previous and similar fires to assure that the conditions adverse to quality were determined.

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

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas Company 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 25th day of March 1996.