

Public Service  
Electric and Gas  
Company

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Senior Vice President - Nuclear Operations

OCT 23 1996  
LR-N96331

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

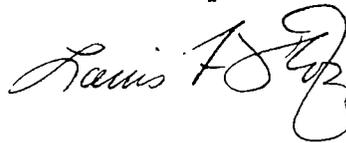
RESPONSE TO NRC NOTICE OF VIOLATION  
INTEGRATED INSPECTION REPORTS 50-272/96-12, 50-311/96-12  
SALEM GENERATING STATION  
UNIT NOS. 1 AND 2  
DOCKET NOS. 50-272 AND 50-311

Inspection Report Nos. 50-272/96-12 and 50-311/96-12 for Salem Nuclear Generating Station Units Nos. 1 and 2 was transmitted to Public Service Electric & Gas Company (PSE&G) on October 1, 1996. Within the scope of this report, one violation of NRC requirements was cited. In accordance with 10CFR2.201, PSE&G is submitting its response to the violation in the attachment to this letter.

In the cover letter of the above-mentioned inspection report, the NRC indicated that the safety consequences of the specific issue resulting in the violation was low; however, a concern was raised that our organization had exhibited symptoms of past poor performance in that we attempted to justify the problem rather than resolve the issue. Although in this specific instance, a violation resulted from an incorrect Technical Specifications interpretation I want to emphasize that nuclear safety, regulatory compliance, and quality decision making continues to be our focus. As our restart effort moves forward, we are emphasizing self assessment and corrective actions as necessary behaviors to meet these objectives.

Should there be any questions regarding this submittal, please contact us.

Sincerely,



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Attachment

C Mr. Hubert J. Miller, Administrator - Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. L. N. Olshan, Licensing Project Manager - Salem  
U. S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Mail Stop 14E21  
Rockville, MD 20852

Mr. C. Marschall - Salem (S09)  
USNRC Senior Resident Inspector

Mr. K. Tosch, Manager, IV  
NJ Department of Environmental Protection  
Division of Environmental Quality  
Bureau of Nuclear Engineering  
CN 415  
Trenton, NJ 08625



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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 August 11, 1996 to September 14, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires, in part, that conditions adverse to quality are promptly identified and corrected, and in the case of significant conditions adverse to quality, the cause of the condition shall be documented, appropriately reported to levels of management, and action taken to preclude repetition.

- A. Contrary to the above, a significant condition adverse to quality existed at Salem Unit 2 facility from December 6, 1995 through December 8, 1995, in that operators did not insure that the reactivity requirements of Technical Specification 3.9.1 had been met prior to entering mode 6. On December 7, 1995, an operator identified and documented the failure to meet Technical Specification 3.9.1 requirements, however, the licensee failed to take action to preclude repetition.

PSE&G concurs with the violation.

**(1) The reason for the violation.**

The failure to sample the water in the Refueling Canal was identified within the Corrective Action Program in December 1995. At that time, a determination using the Technical Specification Bases was made that this was not a Technical Specification violation because the water in the Fuel Transfer Canal had no reasonable potential to affect reactor criticality. This determination, which was later recognized as incorrect, adversely affected the corrective actions taken to prevent recurrence. Corrective actions included revision of the Integrated Operating Procedure for entering Mode 6 (Refueling) from Mode 5 (Cold Shutdown) to add a step to sample for boron concentration in water in the Refueling Canal prior to entering Mode 6. However, another procedure, one for Filling the Refueling Cavity, was revised to include a note to exempt water in the lower Fuel Transfer Canal portion of the Refueling Canal from this requirement. This latter procedure was revised as a direct consequence of the incorrect Technical Specification interpretation. Additionally, Operations personnel failed to note that the acceptance criteria for boron samples was not clearly stated in the revised Integrating Operating Procedure.



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**(2) The corrective steps that have been taken.**

- a) The procedure for filling the Reactor Cavity, S2.OP-SO.SF-0003(Q), has been revised to delete the incorrect note regarding water in the Fuel Transfer Canal portion of the Refueling Canal.
- b) A Technical Specification Surveillance Improvement Program (TSSIP) has been initiated for Salem Units 1 and 2. The scope and content of the TSSIP program was described previously in LER 311/96-008-00. The TSSIP review is expected to be completed December 31, 1997.

**(3) The corrective steps that will be taken to avoid further violations.**

- a) The Integrated Operating Procedures "Cold Shutdown to Refueling," and "Defueled to Mode 6" (which contain similar acceptance criteria regarding boron concentration) will be revised to include proper criteria and appropriate controls prior to entry into Mode 6 for Salem Units 1 and 2.
- b) This violation response will be issued to the Operations and Licensing Departments as required reading by November 1, 1996, to further emphasize the appropriate understanding and implementation of Technical Specifications.
- c) Technical Specification 3.9.1 Bases will be revised to reflect that sampling is required without regard to the amount of water in the refueling canal. This will be completed by March 31, 1997.

**(4) The date when full compliance will be achieved.**

Full compliance was achieved on December 8, 1995, when the Refueling Canal was sampled and confirmed to meet the requirements of Technical Specification 3.9.1.

