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Nuclear Business Unit

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United States Nuclear Regulatory Commission
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RESPONSE TO NRC IDENTIFIED WEAKNESS
INTEGRATED INSPECTION REPORTS 50-272/96-17, 50-311/96-17
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

Gentlemen:

Inspection Report Nos. 50-272/96-17 and 50-311/96-17 for Salem Nuclear Generating Station Unit Nos. 1 and 2 was transmitted to Public Service Electric & Gas (PSE&G) on January 8, 1997. Within the scope of that report a request was made to address an identified weakness in the Radiological Occurrence Report process. PSE&G is submitting its response to the weakness in the attachment to this letter.

Should you have any questions or comments on this transmittal please contact us.

Sincerely,

David F. Garchow
General Manager -
Salem Operations

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Attachment

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The power is in your hands.

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ATTACHMENT

During the NRC's Resident Inspection conducted Salem Generating Station Unit 1 & 2 between November 3, 1996, and December 14, 1996, a weakness in the resolution of issues identified in radiological occurrence reports was identified. As a result, the NRC requested in a letter dated January 8, 1997, from L. Nicholson (NRC) to L. Eliason (PSE&G) that PSE&G response to this identified condition within 30 days. This response addresses the weakness.

REPLY TO THE IDENTIFIED WEAKNESS

Description of the Weakness

The NRC inspector identified that the investigations of the level 2 and 3 Radiological Occurrence Reports (ROR) were thorough and detailed. However, a weakness in the corrective action resolution to address all of the issues identified in the ROR investigation was identified. Specifically, the corrective actions were often being limited to counseling of the involved individuals and communication to the organization.

Reason for the Weakness

The NRC inspector's concerns related to corrective actions fully addressing root causes and any causal factors that were identified as contributors in the ROR. The inspector characterized the ROR investigations as thorough and detailed; however, the corrective action options, discussed in detail in the ROR, that were not being pursued for further consideration, were often not well documented. The inspector gave two examples to illustrate the weakness, ROR 96-123 (involving work control errors resulting in unnecessary exposure) and ROR 96-168 (a worker entering a High Radiation Area without a TLD). In these two cases issues were identified in the ROR, but the corrective actions did not appear to adequately address the underlying generic implication issues to fully address the issues.

The corrective action process, including the Root Cause Manual, were recently enhanced in 1996. The program requirements now include identification of a corrective action for each root cause or causal factor or the need to provide justification including why a corrective action was not specified, was inappropriate, or was

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not feasible (Root Cause Manual Chapter 3, Section 7a). In addition, the Root Cause Manual specifies definite types of corrective actions which have been proven effective for certain root causes, apparent causes, and causal factors. Further, the Corrective Action Process includes the use of verification of effectiveness evaluations which revisit serious issues to ensure that corrective actions were effective. The corrective actions also address generic implications of the event. This process, which has recently been implemented for ROR'S, provides a systematic and consistent approach to address corrective actions.

Corrective Steps That Have Been Taken and Results Achieved

As of January 1, 1997, the ROR program has been fully integrated with the Corrective Action Process and subject to the process standards. Currently, ROR corrective actions explicitly address all causal factors identified in the ROR investigation.

Corrective Steps that Will Be Taken to Avoid Further Weaknesses

Establish a Radiation Protection Corrective Action Desk Guide to ensure Corrective Action Coordinator's consistency of actions and standards in addressing causal factors and generic implications in ROR. The desk guide will be developed by March 31, 1997.