

NOTICE OF VIOLATION

Public Service Electric and Gas Company
Salem Nuclear Generating Station
Unit 2

Docket No.: 50-311
License No.: DPR-75

During an NRC inspection conducted on December 2, 1996, to January 20, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Criterion V of Appendix B to 10 CFR 50 requires that activities affecting quality shall be prescribed by procedures and shall be accomplished in accordance with those procedures.

Procedure NC.DE-AP.ZZ-0012(Q), Rev. 6, Test Program, Section 4.1 requires tests to verify correct installation and proper operation. Also, Section 5.1.c requires that design change Special Test Procedures (STPs) be prepared in accordance with the format and guidelines contained in that procedure. The requirements include: "Initial Conditions...such as filling tanks, valve lineups, support system operational status, etc." are to be included in STPs with sign-offs; "The step by step instructions should include a description of expected plant response and specific guidance for when to abort the test and how to do so...;" and should "Provide test engineer sign-offs on the appropriate steps of the data sheets...to ensure that the step was completed."

Contrary to the above, post-modification test procedures for the Salem control room area air conditioning system did not contain required initial conditions or step sign-offs, as evidenced by the following examples:

1. Procedure STP-1, Revision 1, Integrated Test of Control Area Air Conditioning System (CAACS)/Emergency Air Conditioning System (EACS) [to verify proper operation of isolation dampers and EACS fans], had no provision for establishing initial conditions for the ventilation system nor support systems, such as power and air. In addition, after testing the system in an emergency mode and then pressing the "Normal" control switch, there was no confirmation step to ensure the dampers had returned to the "Normal" position before continuing with the next emergency mode test. Also, the procedure had no provisions for aborting and exiting the test nor for re-entering the test.
2. Procedure 1EC-3505-1 STP-3, Revision 2, CAV Testing and Balancing, had no provisions for initial conditions for the ventilation system or support systems, nor did the procedure consistently provide for sign off of steps requiring the collection of data.

This is a Severity Level IV violation (Supplement 1).

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 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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania
this 12th day of March, 1997