

March 18, 1997

Mr. Leon R. Eliason
Chief Nuclear Officer & President
Nuclear Business Unit
Public Service Electric and Gas Company
P.O. Box 236
Hancocks Bridge, New Jersey 08038

SUBJECT: SALEM GENERATING STATION LICENSED OPERATOR TRAINING - NOTICE
OF VIOLATION

Dear Mr. Eliason:

This letter addresses recent facility letters related to licensed operator training and forwards the enclosed Notice of Violation pertaining to the required requalification training of certain Salem Generating Station licensed operators. Further, this letter requests that PSE&G's response to the violation address the broader issue of assurance of the satisfactory administration of the Salem licensed operator training program.

Specifically, in January 1996 Salem restructured the requalification training program for Salem licensed operators to create a Restart Training Program, including months-long periods of training to groups of operators with the objectives of implementing improved management expectations for operational activities and understanding the revised emergency operating procedures (EOPs). Based on our inspections of the training we have concluded that the training has been high quality and effective. In addition, during initial operator license examinations in January 1996, July 1996, and January 1997, the 23 applicants have been thoroughly trained, and they have passed the examinations with one isolated exception.

Nonetheless, there have been indications that the administration of the licensed operator requalification program has been deficient. For example, in a November 7, 1996, letter PSE&G requested that NRC approve a permanent change to the requalification program cycle such that the two-year cycle which ended in August 1996 would be followed by a two-year cycle beginning on January 1, 1997. Further, the letter requested NRC approval of temporary changes including administering the 1996 annual operating test for a group of fourteen Salem operators in 1997.

In a December 5, 1996, meeting between NRC and PSE&G managers to address the proposals, NRC managers noted that approval of the above requests would represent exemptions from 10 CFR 55.59(a)(1) and 10 CFR 55.59(a)(2), respectively, and as such, PSE&G should submit exemption requests if they intended to pursue such requests.

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In a January 6, 1997, letter, PSE&G requested an exemption to 10 CFR 55.59(a)(2) that was subsequently revoked in a February 12, 1997, letter. Also, it should be noted that the exemption request was submitted after the 1996 operating test requirement had already been violated, and approval of the revised two-year training cycle was proposed in November 1996 after the previous two-year cycle had been completed in August 1996. In a February 5, 1997, letter PSE&G provided a "two-year plan" beginning in January 1997 for requalification training of Salem licensed operators.

Based on the above, the NRC has determined that your requalification training program administration has violated the requirements for an annual operating test and for a continuous training program not to exceed two years in duration. The violation is cited in the enclosed Notice of Violation (Notice)(VIO 50-272/97-03-01). In your January 6 and February 12 letters, PSE&G stated that any operators that did not pass a 1996 operating test would not perform licensed duties and that prior to performing licensed duties, proficiency watches would be performed to ensure watchstanders met the regulations. Based on this we have concluded that these operator licenses remain valid and no action regarding the operator licenses is needed.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

As training has been continuing for Salem licensed operators, the violation appears to represent a weakness in planning on your part. Nonetheless, we are concerned that other training requirements may not have been met. Accordingly, we request that your response to the violation provide assurance on the broader concern about whether your Salem licensed operator requalification training (LORT) program is being administered such that all 10 CFR Part 55 requirements associated with LORT are being met.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room.

Sincerely,

ORIGINAL SIGNED BY:

James T. Wiggins, Director
Division of Reactor Safety

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

Enclosure: Notice of Violation

cc w/encl:

L. Storz, Senior Vice President - Nuclear Operations
E. Simpson, Senior Vice President - Nuclear Engineering
E. Salowitz, Director - Nuclear Business Support
A. F. Kirby, III, External Operations - Nuclear, Delmarva Power & Light Co.
D. Garchow, General Manager - Salem Operations
J. Benjamin, Director - Quality Assurance & Nuclear Safety Review
D. Powell, Manager, Licensing and Regulation
R. Kankus, Joint Owner Affairs
A. Tapert, Program Administrator
J. J. Keenan, Esquire
M. Wetterhahn, Esquire
J. A. Isabella, Manager, Joint Generation
Atlantic Electric
Consumer Advocate, Office of Consumer Advocate
William Conklin, Public Safety Consultant, Lower Alloways Creek Township
Public Service Commission of Maryland
State of New Jersey
State of Delaware

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checked w/ Linville who had no objections *Jim*

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DATE	<i>Jim</i> 03/17/97	<i>Jim</i>	03/17/97	<i>Jim</i>	03/17/97	<i>Jim</i>	03/18/97		03/ /97

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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

In correspondence between November 5, 1996 and February 12, 1997, 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:

1. 10 CFR 50.54(i-1) requires that the facility "shall have in effect an operator requalification program which must as a minimum, meet the requirements of 55.59(c)."
- A. 10 CFR 55.59(c)(4)(i) requires that the "requalification program must include ... annual operating tests.

Contrary to the above, by January 1, 1997, PSE&G conducted a requalification program such that an annual operating test was not provided for fourteen Salem licensed operators in calendar year 1996.

- B. 10 CFR 55.59(c)(1) requires that the "requalification program must be conducted for a continuous period not to exceed two years, and upon conclusion must be promptly followed, pursuant to a continuous schedule, by successive requalification programs."

Contrary to the above, PSE&G conducted one two-year training program that ended on August 31, 1996, and did not begin the next two-year training program until January 1, 1997.

These two examples comprise one 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.

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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 18 day of March 1997