

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 February 7, 1997, to March 28, 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:

10 CFR 50.59 requires, in part, that "the licensee shall maintain records of changes in the facility... made pursuant to this section, to the extent that these changes constitute changes in the facility 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 does not involve an unreviewed safety question."

Contrary to the above, on and before March 28, 1996, PSE&G failed to provide adequate bases for plant design configurations that differed from the FSAR description as evidenced by the following examples:

1. Section 8.1.4.2.4, Revision 11, dated July 22, 1991, specified "a minimal vertical and horizontal spacing between redundant trays of 18 and 12 inches, respectively..."

In safety evaluation S-C-ZZ-EEE-0841, Revision 1, dated July 22, 1996, PSE&G revised the FSAR to allow cables of redundant channels to be separated by a distance less than that previously accepted using criteria for fire protection/Appendix R instead of separation criteria contained in Regulatory Guide 1.75, Revision 1.

2. On October 19, 1990, PSE&G failed to prepare a safety evaluation for FSAR revisions that permitted cable separation configurations not allowed or not specifically allowed by the previous FSAR revision, as in the three examples below.
 - New section 7.9.1 (1) allowed nonsafety-related cables associated with redundant channels to run together, after leaving the associated vital tray.
 - Revised section 8.1.4.2.4 deleted a requirement that, when redundant trays cross each other at less than 18 inches, a fire-resistant blanket be installed on the top of the lower tray, extending a minimum of 24 inches beyond each side of the crossover. In the containment annulus area no fire-resistant blankets were provided where trays cross each other.

- Revised Section 8.1.4.2.5, added a requirement that a minimum separation of 6 inches be provided between redundant channels within panels and racks.

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

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. 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 3rd day of June, 1997.