Public Service
Electric and Gas
Company

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LR-N970371

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

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT 50-311/97-06
SALEM GENERATING STATION
UNIT NO. 2
DOCKET NO. 50-311

Gentlemen:

Inspection Report No. 50-311/97-06 for Salem Nuclear Generating Station Unit No 2 was transmitted to Public Service Electric & Gas Company (PSE&G) on May 30, 1997. Within the scope of this report, one violation of NRC requirements was cited. The violation involved the failure to follow established procedures for the documentation of test results.

In accordance with 10 CFR 2.201, PSE&G is submitting its response to the cited violation in the Attachment to this letter.

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

Sincerely,

Louis F. Storz

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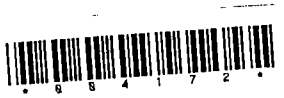

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Attachment

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ATTACHMENT
LR-N970371

Public Service Electric & Gas Company Docket No: 50-311
Salem Nuclear Generating Station License No: DPR-75
Unit 2

During an NRC inspection conducted on March 1 to April 12, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions." NUREG-1600, the violations are listed below:

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

Procedure NC.DE-AP.ZZ-0012(Q), "Test Program", Revision 6, Section 5.2.c requires testing to be conducted with approved step-by-step Special Test Procedures, existing procedures, or standards. Section 5.2.e requires recording test data on data sheets. Section 5.2.f requires evaluating test results to ensure they are acceptable prior to restoring plant equipment.

Contrary to the above, post-modification test procedures for Salem control room area air conditioning system (CAACS) were not followed, required data was not recorded, and plant equipment was restored with test results outside established acceptance criteria, as evidenced by the following examples:

1. Procedure 1EC-3505 package No. 1 STP-2, Revision 2, Control Area Air Conditioning System (CAACS) and Emergency Air Conditioning System (EACS) Coil Test Procedure (to verify heat transfer capability of Unit 1 CAACS and Unit 1 EACS cooling coil units), steps 5.5.3.7 and 5.5.4.7 required the initiation of an Action Request (AR) to clean the coils if the coil appearance was not "bare metal or shiny appearance". The condition of the coil for 1HVE200, recorded on Attachment 7.12 was "...covered with white chalky film..." and an AR to clean the coil was not initiated.

2. Procedure 1EC-3505 Package No. 1, STP-4, Revision 3, Control Area Ventilation (CAV) Leakage Test [for leak testing the ductwork and filter housing which have the potential for leakage into the control room pressure boundary], attachment 7.3 establishes EACS charcoal filter housing and duct maximum allowable leakage test acceptance criteria of 8.0 cubic feet per minute (cfm). Actual leakage rates recorded were 10.78 cfm for Unit 1 and 10.59 cfm for Unit 2. Both recorded leakage rates were outside the established acceptance criteria, but the test results were approved and the EACS system was restored to service.

3. Procedure 1EC-3505 Package No. 1 STP-4, Revision 3, attachment 7.3 requires an EACS charcoal filter housing and duct test pressure of 4.0 inches water column (inwc). Based on the atmospheric pressure recorded in inches of mercury (inHg) and initial boundary pressures in pounds per square foot (psf) absolute (abs.), the test pressures were less than the required 4 inwc.

4. Procedure 1EC-3505 Package No. 1 STP-4, Revision 3, Appendix A, steps 2.e and 2.h require recording the initial and final times of the test. The times were not recorded.

5. Procedure 1EC-3505 Package No. 1, STP-4, Revision 3, Step 5.6.1, requiring review of test data by the test engineer was incorrectly deleted by Modification Concern and Resolution 297.

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

PSE&G concurs with the violation.

(1) The reason for the violation.

The reason for the violation was poor human performance by the CAV project team and testing personnel and management oversight. Personnel involved failed to meet PSE&G's standard of procedural compliance. Personnel did not properly revise CAV Special Test Procedures (STPs) in accordance with PSE&G procedures to reflect changes in testing methodology and acceptance criteria. In addition inadvertent removal of the test engineer acceptance signoff by the project team is an example of inattention to detail. PSE&G management also did not provide an adequate level of management oversight of personnel preparing and implementing the CAV Special Test Procedures.

(2) The corrective steps that have been taken and results achieved.

A. Personnel involved with the occurrences were held accountable for their actions in accordance with PSE&G disciplinary policy.

B. The procedure that details the test program, NC.DE-AP.ZZ-0012(Q), has been replaced by a new procedure SH.PI-AP.ZZ-0012(Q). The new procedure enforces several new standards for special test procedure format and conduct of testing. The new procedure identifies expectations for compliance in test format and acceptance of test results. Test personnel have been trained to SH.PI-AP.ZZ-0012(Q).

C. The acceptance criteria issues associated with each cited example have been addressed and test data has been confirmed and accepted by design engineering personnel.

D. PSE&G management oversight of testing has been enhanced. The Test Review Board (TRB) is made up of qualified senior level engineers, supervisors and managers that perform reviews of test activities. The TRB now conducts post reviews in addition to pre-implementation reviews of design change package Special Test Procedures for effectiveness and compliance to standards. In the TRB review of other HVAC design change package STPs, the TRB found similar deficiencies. These have been corrected. Since the corrective actions identified above have been implemented, the TRB has observed verbatim compliance to STP acceptance criteria in their post modification review of design change package STPs.

   The function of the TRB review is temporary and limited to the testing completed during the current Salem extended outages. In the future the test review function may be assumed by the responsible system manager.

E. In response to the issues in CAV STPs, the TRB reviewed ten non-HVAC system STPs in the following five systems: Fire Protection, 115 VAC, Emergency Diesel Generators, Safety Injection, and Service Water. These STPs were conducted prior to corrective actions being implemented. No other examples of noncompliance to acceptance criteria were identified.

F. Management changes have been implemented within the Project Management & Installation Group to provide greater focus on the conduct of testing. The test group supervision has been strengthened by the addition of more experienced testing personnel. This will enhance management oversight for the conduct of testing.

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

The TRB will continue to perform reviews of post modification STPs for the Salem Unit 1 and 2 restart effort.

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

PSE&G achieved full compliance when the acceptance criteria issues associated with each cited event were addressed and the test data was confirmed and accepted by engineering and design.