

Public Service
Electric and Gas
Company

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OCT 14 1997

LR-N970660

United States Nuclear Regulatory Commission
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Washington, DC 20555

**RESPONSE TO NRC NOTICE OF VIOLATION
INSPECTION REPORT 50-272/97-16 AND 50-311/97-16
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311**

Gentlemen:

Combined Inspection Report No. 50-272/97-16 and 50-311/97-16 for Salem Nuclear Generating Station Unit Nos. 1 and 2 was transmitted to Public Service Electric & Gas Company (PSE&G) on September 17, 1997. Within the scope of this report, one violation of NRC requirements was cited. The violation involved; 1) the failure to properly conduct testing in accordance with approved procedures. This constituted a violation of 10 CFR 50 Appendix B criterion V.

PSE&G recognizes that as a result of the extensive design change modifications performed to the Salem Units during the extended outage, the performance of the Installation and Test Group has been the focus of attention of both, PSE&G and NRC. In general, the Test group performance has been adequate; however, a number of corrective actions have been taken as a result of poor performance that needed to be improved. Although, these corrective actions, including management changes, are relatively new (and the full effectiveness of the actions has not been realized), improvements in the Test Program are continuing.

PSE&G has clearly established and communicated its expectations relative to procedure adherence. Although management's expectations for problem identification and procedure adherence are continually being reinforced throughout the organization, there are cases where individuals have failed to meet these expectations.

The Nuclear Business Unit has emphasized its expectations relative to problem identification and procedure adherence. These expectations include proper implementation of PSE&G's disciplinary policy in accordance with the Management Associated Results Company (MARC) principles.

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This positive approach to discipline is primarily focused on improving personnel performance. This is accomplished through a multi-stage approach of providing direct employee feedback for their actions via coaching, counseling, verbal and written feedback. Termination of employment is also a viable option for failure to meet the fundamental expectations of problem identification and procedure adherence.

Notwithstanding these efforts to improve personnel performance, the Nuclear Business Unit will continue to search for ways to improve its processes and programs to ensure safe operation.

In accordance with 10 CFR 2.201, PSE&G is submitting its response to the cited violation in Attachment I to this letter. Should there be any questions regarding this submittal, please contact us.

Sincerely,



Attachment (1)

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**ATTACHMENT I
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During an NRC inspection conducted on June 14 to July 25, 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 SH.PI-AP.ZZ-0012(Q), Rev. 0, "Modification Test Program," Section 5.2.1.1 states that the Test Engineer is responsible for verifying that prerequisites are complete prior to testing. Section 5.2.2 states that test performers are responsible for performing test steps and making appropriate data entries.

Procedure SC.SE-AP.ZZ-0002(Q), Rev. 0, "Conduct of Testing," Section 5.2.2 requires test instructions to be followed.

Contrary to the above, post-modification test procedures for the Salem Advanced Digital Feedwater Control System were not followed, as evidenced by the following examples:

1. On or about June 15, 1997, at the start of Procedure 2EC-3178, Package No. 1, STP-2, Revision 2, "Advanced Digital Feedwater Control System Power Ascension Testing," Section 5.5.1, "Mode 5 Signal Sampling," no prerequisites were signed off as having been verified.
2. On June 15, 1997, prior to the start of Procedure 2EC-3178, Package No. 1, STP-2, Revision 2, "Advanced Digital Feedwater Control System Power Ascension Testing," Section 5.5.2, "MS10 Dynamic Tuning," Prerequisite 5.2.1, requiring all pre-operational testing in accordance with [DCP] test sections 10.1 through 10.9 and STP-001 was signed off indicating completion, even though STP-001 had not been completed.

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

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PSE&G concurs with the violation

(1) The reason for the violation.

The reason for the violation is attributed to personnel error - the test engineer failed to follow procedures.

DCP 2EC-3178-1 installed the ADFCS in Salem Unit 2. The DCP contains several installation and testing sections, which could be performed during and through different operational modes. On January 2 1997, the Level III test engineer implemented the Noise Monitoring testing in STP-002. STP-002 Prerequisite (5.2.1) requires the completion of STP-001 prior to start of STP-002. On January 2 1997, the test engineer signed off four of the five STP-002 prerequisites. Prerequisite 5.2.1 was not completed and the test engineer made test log entry notes to that effect. The log entry indicates that the test engineer evaluated STP-001, and determined the remaining tests in STP-001 did not effect the start of STP-002. The Test Engineer evaluated plant conditions and verified that testing sections in STP-001 that would have effected conduct of STP-002 noise checks had been completed. Similarly, on June 15, 1997, the same test engineer again evaluated the restart of testing in STP-002 for the "MS10 Dynamic Tuning," and determined that the incomplete STP-001 and prerequisite 5.2.1 did not effect the 21,22,23,24MS10 testing.

In both these cases, the test engineer failed to write a Modification Concern Resolution (MCR) to remove the requirement to complete STP-001, or to complete all the required pre-requisites. Without completing STP-001 or revising the test procedure via an MCR, the test engineer failed to comply with procedures.

(2) The corrective steps that have been taken.

1. Appropriate personnel are being held accountable for their actions in accordance with PSE&G disciplinary policy.

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2. The test engineer was made aware of the requirements for procedure compliance and that:
 - a) All prerequisites for test procedures must be met prior to starting any test,
 - b) Any changes to procedures must be made via an MCR or revision to the procedure and incorporated into the controlled copy being used.
3. On June 15, 1997, MCR 283 was issued deleting the requirement to complete STP-001 prior to starting STP-002. MCR 283 also deleted pre-requisites 5.2.3, 5.2.4 and 5.2.5.
4. The lessons learned from this event have been shared with the rest of the Test Engineers.

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

No further corrective actions are deemed necessary at this time.

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

PSE&G achieved full compliance on June 15, 1997, with the issuance of MCR 283.