

APPENDIX A

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 December 1, 1997 through February 1, 1998, 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:

- A. Technical Specification (TS) 6.8.1 requires, in part, that written procedures be implemented for procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33 recommends that equipment control of safety related systems be covered by written procedures. Administrative procedure SC.OP-AP.ZZ-0103, Step 5.1, requires that components in an off-normal position be tagged to identify the abnormal condition and that the position be updated in the Tagging Request Inquiry System database (TRIS).

Contrary to the above, the licensee did not properly implement administrative procedure SC.OP-AP.ZZ-0103 as evidenced by the following examples:

1. On December 6, 1997, the operators isolated non-essential chilled water loads to comply with Technical Specification Action Statement (TSAS) 3.7.10.a.1, and did not identify the off-normal position of the associated isolation valves with tags or update the valves' positions in TRIS. The non-essential loads were improperly restored on December 11, since the requirement to have the valves in their off-normal position was not recognized by the control room operators. This resulted in violation of TSAS 3.7.10.a.1.
2. On January 30, 1998, the operators opened breakers 2-INCOR-DRY1 and 2-INCOR-DRY2 to comply with TSAS 3.8.3.1.a, and did not identify their off-normal position with tags or update their position in TRIS. The breakers were subsequently repositioned closed on February 3, by Reactor Engineering personnel without knowledge of the on-shift operators.

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

- B. 10 CFR 50, Appendix B, Criterion XI; "Test Control," requires, in part, that test results shall be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, on or before January 31, 1998, PSE&G failed to properly document and evaluate the results of VOTES testing to assure that the test requirements had been satisfied, as evidenced by the following examples:

1. The equation for calculating maximum allowable thrust readings, on Attachment 15 of test procedure SC.MD-EU.ZZ-0012 (Q), includes values for Thrust Switch Repeatability (TSR) and Torque Correction Factor (TCF).

In calculating the maximum allowable thrust reading for valves 1 PR6, 2PR6 and 12CC16, PSE&G used an incorrect value for TSR and, for valve 2PR6, an incorrect value for TCF. These errors were not identified.

2. Attachments 18 and 19 of test procedure SC.MD-EU.ZZ-0012 (Q) require the recording of the valve maximum allowable thrust reading for comparison to actual test results.

The maximum allowable thrust reading recorded on Attachments 18 and 19 for valves 1PR6 and 1PR7 was incorrect. In addition, for valve 12CC16 the maximum (closed) thrust was slightly larger than the maximum allowable thrust reading. The errors were not identified.

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

- C. Sections 4.8.3.1.a.2 and 4.8.3.1.b of the Salem Unit 2 Technical Specification (TS) require, in part, that containment penetration conductor overcurrent protective devices be demonstrated operable by (a) selecting and functionally testing a representative sample of at least 10% of the molded case circuit breakers of that type at least once per 18 months; and (b) subjecting each circuit breaker to an inspection and preventive maintenance in accordance with manufacturers recommendations at least once per 60 months.

Contrary to the above, on and before January 31, 1998, PSE&G failed to demonstrate operability of a molded case circuit breaker, used as a containment penetration conductor overcurrent device, in that the circuit breaker in Panel 97-2 was not in the molded case circuit breaker testing program and no record existed of it having undergone inspection and preventive maintenance.

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 or severity level, (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 5th day of March, 1998

APPENDIX B

NOTICE OF VIOLATION REQUIRING NO RESPONSE

Public Service Electric and Gas Company
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Units 1 and 2

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

During an NRC inspection conducted on December 1, 1997 through February 1, 1998, 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 identified below:

10 CFR 50.49, sections (d) and (j) require, in part, that licensees prepare a list of electric equipment important to safety covered by this section [requiring environmental qualification] and that a record of qualification be maintained in an auditable form to permit verification that each item of electric equipment important to safety is qualified for its application and meets its specified performance requirements when it is subjected to the conditions predicted to be present when it must perform its safety function up to the end of its qualified life.

Contrary to the above, before October 6, 1997, four power range neutron detectors located in a harsh environment were not included in the list of equipment important to safety requiring environmental qualification. In addition, a record of qualification did not exist to verify that the detectors were qualified for their intended application and met their performance requirements when subject to be present when they must perform their safety function.

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

No response to this violation is required.