

Public Service
Electric and Gas
Company

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JUN 17 1998

LR-N980287

Mr. H. J. Miller
Regional Administrator - Region I
U.S. Nuclear Regulatory Commission
475 Allendale Rd.
King of Prussia, PA 19406

Dear Mr. Miller:

**REQUEST TO RELEASE PUBLIC SERVICE ELECTRIC AND GAS
FROM THE REQUIREMENTS OF CONFIRMATORY ACTION LETTER
(CAL-1-95-009) FOR SALEM GENERATING STATION NOS 1 and 2
FACILITY OPERATING LICENSES DPR-70 and DPR-75
DOCKET NOS. 50-272 and 50-311**

On June 9, 1995, the Nuclear Regulatory Commission (NRC) issued a Confirmatory Action Letter (CAL) for Salem Units 1 and 2. Since this date, Public Service Electric & Gas (PSE&G) has taken the required actions and provided information concerning these actions via letters dated June 27, 1997 and March 23, 1998, for Units 2 and 1 respectively. Accordingly, NRC responded by modifying the CAL via letters dated August 6, 1997 (Unit 2 restart) and April 1, 1998 (Unit 1 restart).

With the April 1, 1998 letter, the NRC modified CAL 1-95-009 to permit the restart of Salem Unit 1. NRC also requested PSE&G to provide a summary of our operating and testing experience, and an evaluation of our overall restart plan, including any lessons learned. PSE&G hereby provides the requested information and respectfully requests that it be released from the requirements of CAL 1-95-009 for Salem Units 1 and 2.

Following the May/June 1995 shutdown of both Salem Units and the issuance of the CAL, PSE&G conducted a comprehensive review (self-assessment) of our operational readiness. This review led to the development of the Salem Restart Plan (SRP). The SRP consisted of a comprehensive and systematic approach for the identification, review, approval, assessment and affirmation of the activities needed to support the restart and reliable operation of the Salem Units. The SRP contained three major sections; (1) Plant, People and Process Improvements, (2) Restart Readiness Review and Affirmation, and (3) Startup and Power Ascension Testing.

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As part of this overall SRP, PSE&G established the Management Review Committee (MRC). The MRC was established as an oversight committee to review amongst other things the restart action plans (RAPs), and the System Readiness Review Program (SRRP). The RAPs were developed to address the major areas described above and the identified root and contributing causes for their deficiencies. The root and contributing causes identified and addressed by the RAP were the causes, which led to the decline in performance and eventual shutdown of the Salem Units. The SRRP provided PSE&G with reasonable assurance that equipment operability and reliability issues had been identified, and that effective corrective actions had been taken. This was accomplished by a methodical review of selected systems. These systems were selected on the basis of a combination of attributes such as safe shutdown risk, risk significance, and historical power reduction and high incidence of corrective maintenance. The SRP and its associated RAPs and SRRP were considered living documents/programs. As PSE&G moved forward with the restart process, the SRP was revised (e.g., the Operations and Maintenance interventions) to ensure that PSE&G accomplished the goals necessary to allow for a safe and event free restart of the Salem Units.

In summary, the successful implementation of the Salem Restart Plan in conjunction with other activities, such as the closure of all NRC restart items, led PSE&G to request the NRC to begin its Readiness Assessment Team Inspections (RATI). These inspections independently concluded that PSE&G was ready to proceed with the restart of the Salem Units and embarked on the last portion of the SRP; the Startup and Power Ascension Testing. Modifying the CAL via letters dated August 6, 1997 (Unit 2 restart) and April 1, 1998 (Unit 1 restart) provided this concurrence.

At the MRC of June 15, 1998, departmental affirmations were completed establishing the readiness of the Salem management team to support the safe and reliable operation on the Salem Units. In essence, this affirmation signaled the completion of the startup and testing of the Salem Units 1 and 2.

The Startup and Power Ascension Program for the Salem units was originally developed as a part of the PSE&G Restart Plan. The successful restart of both Units demonstrated that the SRP was successful in improving our plant, process and people. The lessons learned from the Unit 2 startup were captured and used to improve the startup and testing for Unit 1. For example, Unit 2 problem equipment was fixed on Unit 1 and the scheduled was adjusted to do complex tasks first. As a result of better test planning, coordination between departments no major test delays were encountered during the Unit 1 startup.



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In addition, test procedures were improved, test set-ups and sequencing of activities were better controlled, planning was more complete and experienced test engineers applied their knowledge, which resulted in fewer tests and test procedures to test the same functions. This outcome, in itself, was very positive.

Another way to measure the success of the Unit 1 startup is to compare the efficient use of time and resources during the two restarts. The following table provides such a comparison:

UNIT 2 STARTUP		Event	UNIT 1 STARTUP		Unit 1 vs. Unit 2
Day of Startup	Activity Days		Day of Startup	Activity Days	Days
1		Entered Mode 6	1		
5		Fuel Load Complete	4		
11		Entered Mode 5	11		
175		Entered Mode 4	60		
194	45	Entered Mode 3	87	21	-24
239	8	Entered Mode 2	108	5	-3
247	5	Entered Mode 1	113	3	-2
252	3	Reactor Power at 25%	116	4	1
255	9	Reactor Power at 47%	120	4	-5
264	8	ADFCS 10% Load Swing Performed	124	6	-2
272	3	Reactor Power at 90%	130	3	0
275	-	Reactor Power at 100%	133	-	-
	81	Total Mode 3 to 1		46	-35

However, since the Unit 2 startup was delayed by several unscheduled activities (e.g., installation of the containment fan coil unit (CFCU) modification), the comparison can best be measured by evaluating the timeframe from Mode 3 to 100 percent power (i.e., below the heavy black line). As the table shows for this period, the Unit 2 startup took 81 days, while the Unit 1 startup took only 46 days. This difference represents a 43% reduction in the startup time for Unit 1, an accomplishment even more significant since it also included testing of the new steam generators.



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Again, this comparison demonstrates how better teamwork has resulted in greater schedule adherence and more efficient use of organizational resources.

In summary, the Unit 1 startup demonstrated that the Nuclear Business Unit (NBU) has successfully integrated plant, people and process to assure safe, and reliable operation of our nuclear plants.

Attachment 1 to this letter contains a detailed comparison of the two unit startups.

As we move into the future, PSE&G acknowledges that there are a number of areas requiring further management attention. Reducing the Maintenance and Engineering Backlogs, and fully implementing the WorkWeek Management process are areas where additional management focus is needed. Currently, plans are in place to implement the same model to reduce the maintenance backlog that was used for Hope Creek. The engineering backlog will be reduced utilizing both internal and external resources. The plans to reduce the backlogs are either in place or being developed and will be initiated during the remainder of 1998. PSE&G expects that several operating cycles will be needed to achieve their full effect.

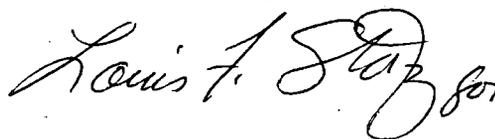
In conclusion, PSE&G is committed to operating its nuclear plants safely and reliably. Our goal is to become a top quartile performer. A strong foundation has been established to achieve this goal; however, we must continue to improve our performance to maintain pace with today's increasing industry standards and competitive challenges. In particular, we need to continue to improve our quality of work and ensure that our operational decisions are conservative. We recognize that the nuclear environment requires people to work to increasingly higher standards.

PSE&G leadership strives not only to meet these standards but exceed them in our daily work practices.

Based on the discussion above and the information contained in Attachment 1, PSE&G firmly believes that it has demonstrated its ability to safely and reliably operate all of its nuclear units. Therefore, PSE&G respectfully requests that it be released from the requirements of CAL 1-95-009 for Salem Units 1 and 2.

If you have any concerns regarding this submittal, please contact us.

Sincerely,



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Mr. H. J. Miller
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