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March 11, 1977

Mr. James P. O'Reilly, Director U. S. Nuclear Regulatory Commission Office of Inspection and Enforcement Region I 631 Park Avenue King of Prussia, Pennsylvania 19406

Dear Mr. O'Reilly: -

NRC INSPECTION REPORT 50-272/77-05 INSPECTION DATE: JANUARY 26-28, 1977 NO. 1 UNIT SALEM NUCLEAR GENERATING STATION



We have received and reviewed the report of your inspection conducted January 26 - 28, 1977. The report was transmitted with your letter of February 18, 1977 and received on February 25, 1977. Our response to the items of noncompliance is as follows:

77-05-03 "Criterion XI, Appendix B, 10 CFR 50 states in part, 'A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedure...' The licensee's Quality Assurance Program states, in FSAR Amendment 28 Appendix D1.4.4, that the preoperational and operational test programs are described in FSAR Chapter 13. FSAR Chapter 13, Amendment 34, Section 13.1 states in part, 'A carefully conceived and executed startup program will be implemented ... The program includes tests...necessary to assure that...power operation can be safely undertaken ... Whenever feasible, tests are performed under conditions similar to normal station operation'.

> "Contrary to the above, during the performance of SUP 82.5, Shutdown from Outside of the Control Room, on January 3, 1977 the procedural requirement that the directions for the positioning of the Auxiliary Feedwater valves be given by the operator at the Hot Shutdown Panel (outside the Control Room) was not followed. The directions for positioning of the Auxiliary Feedwater valves were given by an operator in the control room at the control console".

Analysis of Noncompliance

The decision to give direction for the positioning of auxiliary feedwater valves during SUP 82.5 from the control room instead of the hot shutdown panel was made because the acceptance criteria for the test could not be met using the instrumentation available at the shutdown panel. SORC Meeting No. 2-77 noted that the test failed and recommendation was made to revise the acceptance criteria to allow steam generator level to drop to the low, low water point instead of the operating level and still maintain the high level point to prevent carryover.

A decision should have been made at that time to repeat the test to document that a safe shutdown can be conducted without the aid of information from the control room. Subsequent to your inspection (77-05), the test was conducted on February 24, 1977 and the results were acceptable.

The following corrective measure has been initiated:

To prevent recurrence of this type of oversight, the Station Manager has initiated quarterly meetings with key station supervisory personnel to review and discuss items of this nature.

77-05-02

"Criterion XI, Appendix B, 10 CFR 50 states in part, '...Test Results shall be documented and evaluated to assure that test requirements have been satisfied ...' The licensee's Quality Assurance Program states, in FSAR Amendment 18 Appendix D1.4.4, that the preoperational and operational test programs are described in FSAR Chapter 13'.

"FSAR Chapter 13, Amendment 34, Section 13.1 states in part, 'A carefully conceived and executed startup program will be implemented...The program includes tests...necessary to assure that...power operation can be safely undertaken...Analyses of test results are made to verify that systems and components perform satisfactorily and to determine corrective action, if required. Mr. James P. O'Reilly

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"Contrary to the above, on December 13, 1976 following the determination of the boron endpoint with all control banks inserted as required by procedure SUP 80.3 page 15, the acceptance criteria was incorrectly evaluated. The measured boron endpoint concentration was 946 PPM. The correct acceptance criteria based on design values was 920 <u>+</u> 22 PPM and the licensee used an incorrect acceptance criteria of 942 <u>+</u> 22 PPM".

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Analysis of Noncompliance

Due to an administrative error, a change to the formula for the Design Value Acceptance Criteria was not properly entered in the Master Copy of SUP 80.3, Page 15. The change was subsequently incorporated into the SUP and the test results were verified to be correct.

The following corrective measure has been initiated:

To preclude recurrence of this type, the Reactor Engineer has instructed the Test Engineers to exercise more care when incorporating changes.

With respect to your concern about the implementation of our management control systems that permitted these items to occur, PSE&G QAD will perform an audit of the SUP review cycle to assure non-recurrence of this noncompliance. This audit will be completed by May 30, 1977.

Very truly yours,

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CC: Dr. Ernest Volgenau Bethesda, Maryland