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Public Service Electric and Gas Company 80 Park Plaza Newark, N.J. 07101 201/430-8316

March 30, 1981

Mr. Boyce H. Grier, Director
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

NRC INSPECTION REPORT 50-354/80-21, 50-355/80-21
NO. 1 AND 2 UNITS
HOPE CREEK GENERATING STATION

We have reviewed the report of your inspection conducted from December 1, 1980 to January 4, 1981. The report was transmitted with your letter of March 4, 1981, and received on March 11, 1981.

The following is our response.

Notice of Violation:

"As of December 18, 1980, foreign matter consisting of wood and steel rod was visually observed to be contained inside the 24" HPCI turbine steam discharge line located in the suppression chamber. Final closure welds had been made by the installing contractor. This is considered a third item of noncompliance relative to piping internal cleanliness."

A. Comments

1. On December 19, 1980, Schneider, Inc. Site QC identified a missing pipe end cap on the open end of spool piece P-201, outside the suppression chamber and documented this on a Housekeeping Inspection Report along with the debris inside the P-201 spool piece. The pipe end cap was replaced on the same date. The debris inside P-201 was noted on additional Inspection Reports prepared on December 23, 1980 and December 29, 1980. Its removal was documented on an Inspection Report dated December 31, 1980.

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2. Schneider Inc.'s Inspection Plans define cleanliness requirements to be performed prior to fit-up of a weld joint. For the subject piping spool, internal cleanliness had been verified by Schneider QC during receipt inspection from their fabrication shop on June 23, 1980. Internal cleanliness was again verified prior to fit-up of the closure weld (F.W. #3) on July 15, 1980. From this supporting documentation, it can only be ascertained that the debris entered the pipe spool through the penetration from outside the Suppression Chamber; an area that is not under control of Schneider, Inc. NRC Inspection Report 80-16 identified a previous Schneider housekeeping problem. Investigation of that noncompliance found that Schneider, Inc. failed to perform committed surveillance from October 1, 1980 through October 21, 1980. In addition, the pipe cap on the exterior of the torus was removed during this period to permit radiography of the closure weld. It is Schneider's position that the debris entered pipe spool P-201 during this time frame.
3. These facts were clearly presented to the NRC during the meeting at Region I on February 5, 1981, with particular emphasis on the time frame of the closure of access to this spool from Schneider's work areas and the previous housekeeping problems noted by the NRC. We also reviewed the presence of construction craft employees of other contractors in the area of access to spool P-201. We are reiterating our contention that it is unreasonable to assume that Schneider, Inc. activity is the cause of foreign matter being found in spool P-201 when there is no access to this spool from Schneider's work area. Therefore, this should not be considered a third item of noncompliance related to Schneider Incorporated's performance.

B. Corrective Steps Taken and Results Achieved:

1. Debris inside spool piece P-201 has been removed.
2. Reinspection of Schneider, Inc.'s installed piping systems for internal cleanliness will be performed. This reinspection will be performed to detect debris which may have entered piping systems during the October 1, 1980 through October 31, 1980 period when Schneider, Inc. failed to perform housekeeping surveillance.

C. Corrective Steps Taken to Avoid Further Items of Noncompliance:

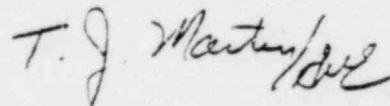
The corrective actions previously provided in our response to NRC Inspection Report 80-16 are still considered adequate to prevent entry of foreign material into piping systems. Those corrective actions included the revision to Schneider, Inc. Housekeeping Inspection Plan S-520-1 and the reinstatement of their weekly (minimum) surveillance of housekeeping activities. Schneider, Inc. has performed and documented their inspections twice a week. In addition, Schneider, Inc. QC and Construction Personnel have been directed that housekeeping is a full-time concern and that poor practices and violations of the Housekeeping Procedures should be addressed and corrected immediately.

D. Date When Full Compliance Will be Achieved:

Reinspection of Schneider, Inc. installed piping systems will be completed by March 31, 1981.

The records of the above activities are available on site for review by your inspectors.

Very truly yours,



CC: Office of Inspection and Enforcement
Division of Reactor Construction and Inspection
Washington, D.C.
H. E. Morris
Bechtel Power Corporation

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STATE OF NEW JERSEY)

) SS: COUNTY OF ESSEX
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RICHARD M. ECKERT, being duly sworn according to law deposes
and says:

I am a Vice President of Public Service Electric and Gas
Company, and as such, I find the matters set forth in our
letter dated March 30, 1981, concerning combined NRC
Inspection Report 50-354/80-21 and 50-355/80-21 are true to
the best of my knowledge, information, and belief.

Richard M. Eckert

RICHARD M. ECKERT

Subscribed and sworn to before me
this 30th day of March, 1981

Walter F. Valaiba

Notary Public of New Jersey

My Commission expires on Feb-18, 1985