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September 28, 1982

Mr. Ronald C. Haynes, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs

Gentlemen:

NRC COMBINED INSPECTION 50-272/82-17 AND 50-311/82-17
SALEM GENERATING STATION
UNITS NO. 1 AND 2
JULY 7 THRU AUGUST 3, 1982

The following is our response to the items of violation identified during the subject inspection.

ITEMS OF VIOLATION

Item A.1

10CFR50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions and procedures and shall be accomplished in accordance with such procedures. With respect to availability of as-built drawings, the above is implemented through FSAR Amendment 43 which establishes a commitment to ANSI N 18.7 - 1976 and thus to ANSI N 45.2.8. Administrative Procedure, AP-3, describes the system whereby the Technical Document Room distributes a list (Operational Design Change Notice (ODCN) Report) of those design changes outstanding against drawings and how the list is used to determine "as-built" status. The Administrative Procedure also states that ODCN's are to be distributed by the TDR and filed by receiving departments.

Contrary to the above, failures to maintain as-built information in Operations Department files are listed below:

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- (a) Changes were not identified in the ODCN list dated July 1, 1982 for the following drawings affected by the indicated design changes:
 - (1) 205336 - DCR 2 ET 760
 - (2) 205226 - DCR 1 SC 525
- (b) Files in the control room were deficient in describing as-built conditions of completed work for the following drawings:
 - (1) 205201 - DCR 1 EC 1215 ODCN not filed and drawing not stamped "DCP issued"
 - (2) 205236 - DCR 1 EC 1212 ODCN not filed
 - (3) 205234 - DCR 1 EC 0975 ODCN not filed
 - (4) 205246 - DCR 1 EC 555A ODCN not filed
- (c) Procedures were not updated to reflect system changes in that installed valve 1 SW 963 was not in the system valve lineup nor in the Tagging Request and Inquiry Sytem (TRIS) computer data base.
- (d) The as-built condition of partially completed Design Change 1 EC 0723, affecting drawings 205231 and 205242, was not described in any available documentation.

Reply to Item A.1 (a)

- 1. The design package for this change has been reviewed. The change was initiated to facilitate endurance testing of the auxiliary feedwater pumps in response to NRC requirements. Due to NRC questions regarding test data, the possibility of additional testing dictated leaving the test piping hooked up after the original tests were completed. Since the test arrangement was temporary, no formal ODCN was issued; only a sketch delineating the interim piping configuration was included. Our review of other Testing Design Change Packages indicates that no clear-cut guidance exists for a uniform method for inclusion of drawings for temporary hook-ups in Test DCR's.

Station Administrative Procedure will be revised to ensure that future temporary design changes are either removed in a timely manner, or made permanent by issuance of a new Design Change Request (DCR). Additionally, Nuclear Engineering Procedures will require that all future test DCR's with temporary plant modifications are to be issued with ODCN's for Technical Document Room distribution. The necessary procedural changes will be made by November 15, 1982.

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2. The design change package for this change has been reviewed. The package, which installed a level control, was issued by instrument and controls discipline and the mechanical discipline was inadvertently not notified to make the appropriate revision to mechanical piping diagram 205226. Current procedures require lead change sponsors to ensure that all necessary disciplines are involved in developing design changes. This item is regarded as an isolated error, not indicative of a system problem.

The appropriate revision to the affected drawing will be issued by November 15, 1982.

Reply to Item A.1 (b) and (d)

The present system employed to ensure drawings are current and updated when a design change is implemented is cumbersome and difficult to follow.

Upon notification by the Resident NRC Inspector of his findings, the departmental drawing files were reviewed and all deficient drawings were identified. The deficiencies that could be immediately corrected were, and in the cases where replacement ODCN's or the proper drawing revisions could not be obtained from TDR, they were placed on order. As soon as the ordered documents are received, they will be inserted into the departmental drawing files. This action was an interim measure. The Administrative Procedures for design changes and document distribution are being evaluated. The methods to update drawing lists, to handle Design Change Packages, and to control document distribution will be included.

The evaluation is expected to be completed, and the new method in place by January 1, 1983.

Reply to Item A.1 (c)

Staff personnel noted which procedures had to be changed due to the DCR, and the DCR was passed on through the review process in order to expedite the review and closeout. However, the changes were not entered into the procedures in a timely fashion.

A review of AP-8 revealed that no specific requirement exists requiring all procedure changes to be complete before signing off a DCR.

Mr. R. C. Haynes, Director
U.S. Nuclear Regulatory Commission

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However, upon notification of the problem, the required procedure changes were immediately made. Staff personnel were advised not to pass on any DCR unless all required changes are completed.

Item A.2

Technical Specification 6.8.1 and Administrative Procedure AP-6, Incident Report and Reportable Occurrence Program, require the preparation of incident reports for events requiring notification in accordance with Technical Specifications.

Contrary to the above:

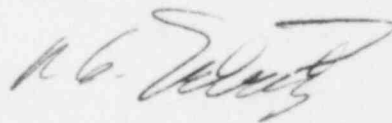
No incident report was prepared for failure of the 1C Vital Ventilation Control Center feeder breaker on June 23, 1982, an event which resulted in inoperability of Control Room Emergency Air Conditioning Fan 12 and invoked Technical Specification Action Statement 3.7.6.1.a. Inquiry by the NRC Senior Resident Inspector on July 19, 1982 resulted in preparation of an incident report and submittal of a Licensee Event Report within 30 days, as required by Technical Specification 6.9.1.9.b.

Reply to Item A.2

The reporting requirements were oversights because the 1C Vital Ventilation MCC was not specifically listed in STS as a bus that was required to be energized.

A Technical Specification Interpretation Guide will be developed to cover this area of concern and will be included in OD-12, Technical Specification Interpretations. The revision to OD-12 will be issued by October 1, 1982.

The late submittal of this response has been discussed with Mr. L. Norrholm, Senior Resident Inspector, and Mr. B. Keimig of the Project and Resident Programs Division.




CC Director, Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

STATE OF NEW JERSEY)
) SS: COUNTY OF SALEM
COUNTY OF SALEM)

RICHARD A. UDERITZ, 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 response dated
September 28, 1982, to the NRC's combined inspection report
50-272/82-17 and 50-311/82-17 are true to the best of my knowledge,
information and belief.



RICHARD A. UDERITZ

Subscribed and sworn to before me
this 4TH day of OCTOBER, 1982



Notary Public of New Jersey

My Commission expires on SEP 10 1988
RUDOLPH L. von FISCHER JR.
Notary Public of New Jersey
~~My Commission Expires Sept 10, 1988~~