

Richard A. Uderitz

Vice President -

Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 935-6010

January 27, 1983

Mr. Ronald C. Haynes, Regional Administrator
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 MEETING REPORT 50-272/82-32, 50-311/82-30
SALEM GENERATING STATION
UNITS NO. 1 AND 2
NOVEMBER 9, 1982

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

ITEMS OF VIOLATION

Item A

Technical Specification 6.8.1 requires the preparation and implementation of equipment control procedures. Administrative Procedure (AP)-15, "Safety Tagging Program" requires an independent verification of alignment and tagging when safety related equipment, including auxiliary feedwater, is taken out of service. Operations Directive (OD)-8, "TRIS (Tagging Request and Inquiry System) Tagging Operations" describes independent verification as a subsequent check of the tagging and valve alignment by a second qualified individual.

Contrary to the above:

On October 4, 1982, independent verification of a tagging and valve alignment operation on Auxiliary Feedwater Pump 23 was not conducted in that a subsequent check by a second qualified individual was not performed.

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Mr. R. C. Haynes, Regional Administrator
U.S. Nuclear Regulatory Commission

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Reply to Item A

The cause of the valve misalignment was personnel error. It was not discovered because a second independent verification was not performed. The omission constituted an inadequacy in the implementation of administrative and procedural controls.

The Operations Manager personally discussed with each Operations Department Supervisor the importance of procedure adherence and compliance. It was stressed that it was their responsibility to ensure that all personnel who reported to them were to be held accountable for procedure adherence.

They were reinstructed in their responsibility to monitor activities of all their personnel with increased surveillance, and to verify strict adherence to departmental policies and procedures. The need for disciplinary action, when required, was emphasized.

It was clearly established that this is a very serious subject and immediate corrective action will be taken in all cases where established departmental policies and procedures are not strictly adhered to. The existing system of audits to verify strict procedure adherence will continue in order to identify problem areas.

In addition, actions have been initiated to evaluate the feasibility of installation of a system to continuously monitor the position status of all major critical flow path isolation valves that are installed in the Emergency Core Cooling System.

In order to further reduce the probability of human error and prevent undetected valving errors, the administrative programs delineating the requirements for the manipulation and alignment of mechanical and electrical components will be thoroughly reviewed and revised as required to ensure continuity in policy and philosophy.

Sincerely,



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

Mr. Leif J. Norrholm
NRC Senior Resident Inspector