

U.S. NUCLEAR REGULATORY COMMISSION

Region I

Report No. 50-272/84-03
50-311/84-03

Docket No. 50-272
50-311

License No. DPR-70
DPR-75 Priority -- -- Category C
C

Licensee: Public Service Electric and Gas Company
80 Park Plaza
Newark, New Jersey 07101

Facility Name: Salem Nuclear Generating Station, Units 1 & 2

Inspection at: Hancocks Bridge, New Jersey

Inspection conducted: February 27-March 2, 1984

Inspectors: S. D. Hudson March 27, 1984
S. D. Hudson, Senior Resident Inspector
Nine Mile Point, Unit 1
date signed

date signed

Approved by: L. J. Norrholm 4/4/84
L. J. Norrholm, Chief, Reactor Projects
Section 2B, DPRP
date signed

Inspection Summary:

Inspection February 27-March 2, 1984 (Report No. 50-272/84-03 and 50-311/84-03)

Areas Inspected: Special inspection by one inspector (35 hours). Areas inspected are required by the Order Modifying the License issued May 6, 1983 including procurement, vendor manuals, post maintenance testing, training, the Inspection Order System, and the Nuclear Assurance and Regulation Department.

Results: One violation was identified. (Failure to perform a review of vendor manuals for post maintenance testing).

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DETAILS

1. Persons Contacted

- *J. Driscoll, Assistant General Manager-Salem Operations
- *J. Jackson, Technical Engineer
- J. Meredith, Principal Training Supervisor
- J. Morrison, Senior Staff Engineer, Maintenance
- F. Omohundro, Manager-Corporate Quality Assurance
- A. Orticelle, Instrument and Control Engineer
- M. Rosenzweig, Q.A. Procurement Engineer
- R. Vanderdecker, Senior Staff Engineer, Instrument and Control
- *J. Zupko, General Manager-Salem Operations

*Designates those individuals who attended the exit interview.

2. Inspection Scope

On May 6, 1983, the Salem Nuclear Generating Station, Units 1 and 2 were issued an Order Modifying the License which required implementation of a number of near-term and long-term actions. On September 28 - October 6, 1983, a special team inspection (No. 50-272/83-15; 50-311/83-12) was performed to review and evaluate specific items in the Order. The scope of this inspection involves the review of follow up items from the previous team inspection and long term training programs which are not yet required to be implemented. The item numbers refer to the May 6, 1983 Order.

3. Item C.1.b.1, Verify Completeness of the Master Equipment List (MEL)

Unresolved Item (50-272/83-25-01): Licensee to review inconsistencies in the Controls section of the MEL concerning Commercial Catalog Item classification. The licensee has not yet completed his review of this item but the licensee stated that it would be completed as a part of the next semi-annual review of the MEL. The previous NRC inspection (No. 50-272/83-25) found no discrepancies in the safety classification of components in this section of the MEL. This item remains open pending review of the licensee's actions.

Inspector Followup Item (50-272/83-25-02): Licensee to revise Administrative Procedure AP-9. The inspector reviewed AP-9, "Control of Station Maintenance," Revision 9, including minor revisions dated February 2, 1984 and verified that it now contains the instructions on use of the MEL specified in Field Directive S-C-A900-NFD-080; Revision 3. This item is closed.

4. Item C.2.b.1, Modify Procurement Procedures

Inspector Followup Item (50-272/83-15-06, 50-311/83-12-06): Licensee to revise Administrative Procedures (AP) and Quality Assurance Department Procedures (QAP) to incorporate VPN-PP-1, "Procurement Control Procedure." The inspector reviewed AP-19, "Supplies and Material Procurement Program" and determined that the responsibilities for management of the procurement

program and component classification are clearly specified. The inspector also reviewed QAP 3-1, "Procurement Document Review," QAP 3-2, "Supplier Evaluation/Approval," and QAP 4-1, "Receiving Inspection" and verified that the appropriate QAP's had been established. This item is closed.

Inspector Followup Item (50-272/83-15-07, 50-311/83-12-07): Licensee to provide guidance on verification of proper classification of material order/item classification (MOIC's) forms. QAP 3-1 requires that the quality assurance department review all MOIC's for accuracy and completeness. Additionally, QAP 3.1-1 requires that the safety classification of 5% of all MOIC's is independently verified by Q.A. engineers. This verification requires that the safety classification be evaluated against specific criteria rather than simply accepting the classification listed on the MEL. This independent verification therefore provides an additional level of assurance the MOIC's are properly classified. This item is closed.

5. Item C.6.b, Long Term Actions for Updating Vendor-Supplied Information

Inspector Followup Item (50-272/83-15-03, 50-311/83-12-03): Review vendor manuals identified in the short term program, completed May 1, 1983, and revise any station procedures where necessary by January 1, 1984. In a letter from Mr. E. A. Liden, PSE&G, to Mr. H. B. Kister, NRC, dated February 22, 1984, the licensee identified that it has started a program to review vendor manuals against maintenance and operating procedures. This program will take longer to complete than initially estimated since recommendations in the vendor manuals need to be evaluated against the installed equipment. Some vendor recommendations may not be incorporated due to equipment modifications, equipment actual usage rate, or operating experience. This program includes:

- a. Review of the current safety related vendor manuals against pertinent operating, maintenance and surveillance procedures. This task will be completed by July 1, 1984.
- b. Review of safety related vendor manuals, completed design changes, field directives and safety evaluations to identify significant differences. Completed design changes, field directives or safety evaluations which affect specific information addressed in the vendor manuals will be documented by issuing manual revisions or addenda by January 1, 1985.
- c. Differences identified in (a) will be evaluated. This evaluation will resolve each difference by either certifying its acceptability, revising station procedures and/or initiating a long term investigation, as appropriate. This task will be complete by January 1, 1985.
- d. Review of revised Vendor Manuals (identified during task (b)), Safety Evaluations and Field Directives against station procedures will be completed by July 1, 1985.
- e. Review of vendor manuals against procedures will also be incorporated into an ongoing process as part of the normal review and validation program conducted biennially for each procedure.

Senior station management representatives stated that the differences between station procedures and vendor manuals would be evaluated as soon as identified, thus the January 1, 1985 date represents a completion date for those items requiring a more detailed engineering review.

The inspector noted that the licensee has issued Administrative Procedure AP-8, "Vendor Manual Deviation Documentation Program," Revision 0, dated February 9, 1984 to ensure that each deviation is formally documented and approved by the Stations Operations Review Committee. The inspector noted that while the Maintenance Department personnel have started a review of vendor manuals, they are already behind their schedule for on time completion. The Instrument and Control Department has not yet started its review. Additionally, a forced outage of Unit 1 has just begun which may place significant demands on the individuals involved in this review. The inspector also found no prioritized schedule was established to ensure that vendor manuals for those systems most important to safety would be reviewed first. The licensee stated that a prioritized review schedule would be established.

This item remains open pending NRC review of the licensee's actions.

Inspector Followup Item (50-272/83-15-04, 50-311/83-12-04): Licensee to provide direction to all individuals on the proper use of vendor documents. The inspector reviewed a PSE&G letter from the General Manager-Nuclear Support to all General Managers and Departmental Managers regarding the proper use of vendor manuals. Some departments have chosen to maintain superceded copies of vendor manuals. For example, the I&C department maintains superceded manuals for conducting training on older models of equipment which have been removed from the plant. The inspector examined several of these superceded manuals. They are stored in separate training areas and are clearly labelled "For Training Only." This item is closed.

Inspector Followup Item (50-272/83-15-05, 50-311/83-12-05): Revise AP-3 to require timely review of new or revised Vendor Manuals. The inspector reviewed a minor revision to Administrative Procedure AP-3, "Document Control Program," dated October 18, 1983 which requires that vendor manuals be reviewed and incorporated into departmental procedures as appropriate, within 60 days of receipt. The licensee stated that they intend to implement this updating requirement of procedures following completion of the initial review of vendor manuals on July 1, 1984. This item is closed.

6. Item C.8.a.1, Revise Station Procedure Concerning Post Maintenance Testing

Inspector Followup Item (50-272/83-15-02, 50-311/83-12-02)" Licensee to revise A-21 to include leak rate testing of ECCS check valves. The inspector reviewed Maintenance Department Procedure A-21, "Maintenance Department Testing and Retest Notification," Revision 2, dated November 2, 1983 and verified that the leak rate test required by Technical Specifications for ECCS check valves had been included in the procedure. This item is closed.

7. Item C.8.a.2, Review Vendor Manuals for Post Maintenance Testing Recommendations and Incorporate Necessary Changes

This long term action of the Order required that the licensee "complete (a) review of vendor and Engineering recommendation (for post maintenance operability testing) and incorporate necessary changes into departmental documents by January 1984." The inspector found that the licensee has completed a review of Westinghouse Technical Bulletins and Data Letters and its Engineering Department's Field Directives for post maintenance testing recommendations. Approximately five changes were required and have been made as a result of this review. However, the licensee has not yet reviewed the manuals provided by other vendors of safety related equipment. A senior station management representative stated that they intended to review only the Westinghouse Technical Bulletins and Data Letters by January 1984. Other vendor manuals would be reviewed by July 1, 1984 as specified in PSE&G letter dated February 22, 1984.

The Order references a series of PSE&G letters that provide details of the long and short term programs that the licensee must complete. A March 14, 1983 PSE&G letter, Section 3.9, Updating Vendor-Supplied Information, stated that controlled copies of all Westinghouse Technical Bulletins and Data Letters have been obtained. "A review will be made to ensure that applicable documents are incorporated into Station procedures, where appropriate, by July 1, 1983." This action is listed in the Order as Item C.6.b.e. The March 14, 1983 PSE&G letter Section 3.11, Post Maintenance Operability Testing, states: "A review of vendor and engineering recommendations and current testing procedures will be made. Based on this review, changes will be incorporated into departmental documents by January 1, 1984." This action is listed in the Order as Item C.8.a.2. Since the licensee stated the Westinghouse Technical Bulletins and Data Letters would be reviewed and incorporated by July 1, 1983, the review of vendor and Engineering recommendations and necessary revision of departmental documents apparently means a review of other vendors of safety related equipment by January 1, 1984. The failure to perform this review as required by Item C.8.a.2 is an apparent violation of the May 6, 1983 Order. (50-272/84-03-01, 50-311/84-03-01)

8. Item C.8.a.3, Incorporate Items Identified into the Inspection Order System

The Inspection Order (I.O.) System is a computerized scheduling system to help ensure that preventive maintenance items and technical specification required surveillance tests are performed on time. In 1983, as the result of a previous review by PSE&G, 5000 new items were added to the I&C Department's list and 3000 new items were added to the Maintenance Department's list. The current total number of items for the I&C and Maintenance Departments stands at approximately 11,500 and 4500, respectively. Additionally, as the result of the ongoing review of the Managed Maintenance Program, it is estimated that 2000 more items will be added to the I&C Department and 3000 more items to the Maintenance Department.

The I&C and Maintenance Departments currently have an I.O. backlog of 800 and 2700 outstanding items, respectively. No technical specifications required

surveillance tests are overdue. Each department attributed the backlog to manpower shortages and the current backlog of items requiring corrective maintenance. The licensee stated that they had recently obtained a temporary maintenance contractor to help relieve this backlog. The implementation of the I.O. system will be examined during a future inspection. (50-272/84-03-02, 50-311/84-03-02)

9. Item C.9.1, Complete Staffing of Nuclear Assurance and Regulation Department

The Nuclear Assurance and Regulation Department was established to provide senior management with an independent evaluation of nuclear safety, regulatory compliance, reliability and the quality assurance program. The two major functional areas are Corporate Quality Assurance and Nuclear Safety Assurance.

The inspector reviewed the charter of the Manager-Corporate Quality Assurance and his January 1984 monthly report. He also discussed the responsibilities of the function with the current Manager. These evaluations are not designed to replace the Q.A. audit or Q.C. inspection. There is no systematic program of areas to be examined or checklists for performing these reviews. However, this area appears to be functioning satisfactorily. Although this area had been staffed with 6 people, the licensee has reduced the staffing to just one engineer working directly for the Manager-Corporate Quality Assurance. Both individuals are located at the site. The inspector had no further questions in this area.

Neither the Manager-Nuclear Safety Assurance, nor the engineer working for him, nor the General Manager-Nuclear Assurance and Regulation were on-site during this inspection. This area will be examined during a future inspection. (50-272/84-03-03, 50-311/84-03-03)

10. Item C.9.4, Training Program for Senior Supervisory Personnel

Inspector Followup Item (50-272/83-15-01, 50-311/83-12-01): Licensee to implement senior supervisory training. The inspector reviewed Training Procedure TP-902, "Technical Supervisory Skills Program-2," Revision 0. This outlines a five week long program to be presented to all second level supervisors up to department managers. This encompasses about 40-50 people. The topics include: plant systems, labor relations, technical administration, Q.A. program, Nuclear Department and industry policies, standards and ethics, managing, and aberrant behavior. The inspector observed a portion of a class on plant systems. The licensee intends to complete the initial training for all senior supervisors currently at Salem by the end of 1984. This item is closed.

11. Item C.9.5, Develop a Program for Periodic Training for Supervisory and Management Personnel

This program is still under development. Per the Order, it is not required to be completed until Spring 1984. The inspector reviewed draft Training Procedure TP-903HC, "Technical Supervisory Skills Program-3." The program will be designed to provide continual training to all first line supervisors thru department managers. At least one managerial and one technical topic would be presented each quarter. Attendance at each course

will be determined by the department manager.

This item remains open pending review of the implementation of the program.

12. Item C.9.5, Develop Technical Training Program for Non-Station Personnel

This program is still under development. Per the Order, it is not required to be completed until Spring 1984. The program will be designed to provide managerial and technical training to a broad based group of engineers and support personnel located at the site. The licensee has developed a training matrix of introductory topics and a listing of more detailed topics in the areas of Q.A., B.W.R. technology, P.W.R. technology, and management skills. Department managers will assign individuals to attend the detailed topics on an as-needed basis.

This item remains open pending review of the implementation of this program.

13. Exit Interview

At the conclusion of the inspection, the inspector met with those individuals designated in paragraph 1 to discuss the inspection findings. In a phone call, the inspector discussed the apparent violation with Mr. J. Zupko on March 7, 1984 and Mr. J. Driscoll on March 8, 1984.