



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038

Nuclear Department

May 24, 1984

Regional Administrator, Region 1  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

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

Dear Mr. Starostecki:

NRC COMBINED INSPECTION 50-272/84-13 AND 50-311/84-13  
LALEM GENERATING STATION  
UNITS NO. 1 AND 2  
DOCKET NOS. 50-272 AND 50-311

During the subject inspection, conducted on March 7 through April 11, 1984, two violations were observed including failure to post and control access to a high radiation area and failure to take prompt corrective action involving the removal of combustibles identified in the auxiliary building. The following are PSE&G's responses to this Notice of Violation.

NOTICE OF VIOLATION

Item A

Criteria XVI of 10 CFR 50 Appendix B requires that the licensee's Quality Assurance Program (QAP) establish measures to assure that conditions adverse to quality be promptly identified and corrected. Section 17.2.16 of the SGS-UFSAR, the licensee OAP, requires that administrative procedures (AP) which govern station activities covered by the OAP provide for timely discovery and correction of nonconformances. AP 25,

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Station Fire Protection Program, requires timely correction of identified deficiencies and requires removal of packing materials and other combustibles from work areas immediately following work completion or at the end of each shift, whichever comes first.

Contrary To The Above:

Cardboard boxes of MSA ventilation filters in an area without fixed suppression on the 122' elevation of the Unit 2 auxiliary building were identified as a deficiency in the licensee Management Cleanliness and Material Inspection Report dated March 2, 1984 and the deficiency was not corrected as of March 22, 1984.

Reply to Item A

a. Corrective Steps Which Have Been Taken And The Results Achieved:

The Operations Department responded by immediately removing the combustible packing material from the building and moving the filters to an area protected by a fixed suppression system until installation could be completed.

b. Corrective Steps Which Will Be Taken To Avoid Further Violations

The Operations Manager has directed his staff and shift personnel to aggressively enforce the station combustible material control program. Discrepancies noted on the OD-34 log will be promptly corrected if in the opinion of the Shift Support Supervisor, these are violations of AP-25, Station Fire Protection Program. All operating personnel responsible for implementation of the combustibles control program have been advised that action must be taken immediately when violations occur, and their responsibilities in this area have been reemphasized.

c. Date When Full Compliance Will Be Taken

We are in full compliance.

Item B

Technical Specification 6.12 requires that high radiation areas (greater than 100 mrem/hour) be barricaded and conspicuously posted as a High Radiation Area and that areas accessible to personnel with radiation levels such that a major portion of the body could receive a dose greater than 1000 mrem in one hour be locked to prevent unauthorized access.

Contrary To The Above:

On March 26, 1984, a zone survey of the Unit 2 Skimmer Filter Room identified a high radiation area in which a person could receive greater than 1000 mrem to a major portion of the body in one hour. As of March 30, 1984, the area was neither conspicuously posted as a High Radiation Area nor locked to prevent unauthorized access.

Reply To Item B

a. Corrective Steps Which Have Been Taken And The Results Achieved

The Radiation Protection Department responded by immediately blocking all doors leading to the Unit 2 Spent Fuel Pool Skimmer Filter Room. Personnel responsible for failing to take action to properly control this area were disciplined. Meetings were held with Radiation Protection Department personnel to inform them of the incident and to emphasize the importance of conducting thorough surveys and questioning abnormal conditions and the need for proper posting of area. Department personnel have been instructed to document (on the survey map) all postings within an area when conducting a zone survey. A trending mechanism is being utilized to provide early warning to Radiation Protection personnel of the need to take corrective action due to changing dose rates for this and other areas where changing dose rates exist.

An instruction was placed in the night order book for Radiation Protection Technicians giving instructions regarding the identification of High Radiation or High Contamination readings on Radiation-Contamination survey forms. The filter survey form was modified to include the Unit 1 and Unit 2 Spent Fuel Pool Skimmer Filter.

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Lockable gates have been installed at the entrance to the room for purposes of controlling personnel access. Also, a Design Change Request has been initiated to lower the setpoints on 1R29 and 2R29 to provide additional warning of increasing dose rates.

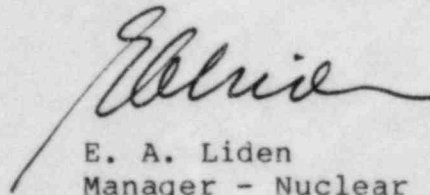
b. Corrective Steps Which Have Been Taken To Avoid Further Violations

A review of the practice of having Radiation workers performing "Zone" surveys will be conducted to determine if these persons possess the required skills to perform an adequate "Zone" survey.

c. Date When Full Compliance Will be Achieved

We are in full compliance.

Sincerely,



E. A. Liden  
Manager - Nuclear  
Licensing and Regulation

C Mr. Donald C. Fischer  
Licensing Project Manager

Mr. James Linville  
Senior Resident Inspector

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