

APPENDIX A

NOTICE OF VIOLATION

Public Service Electric and Gas Company
Salem Units 1 and 2

Docket/License: 50-272/DPR-70
Docket/License: 50-311/DPR-75

As a result of the inspection conducted on April 12, 1984 - May 8, 1984 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

A. Technical Specification 6.8.1.a requires that written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 be implemented.

1. Integrated Operating Procedure (IOP) 8, Maintaining Hot Standby (HSB), Revision 1, requires that Operating Instruction (OI) III.9.3.4, Placing the Condensate System in Service for Cleanup, Revision 0, be carried out if the plant will remain in HSB for more than three hours. OI III.9.3.4 requires that valves 21-24BF13 be closed.

Contrary to the above, 21-24BF13 were not closed during the period between a unit trip at 9:17 a.m. on April 6, 1984 and a water hammer event which occurred while stroke testing feedwater regulating valve 23BF19 at 4:33 p.m. on April 6, 1984 with the unit in HSB.

2. Administrative Director (AD) 16, Post Reactor Trip/Safety Injection Review, Revision 4 requires that if the cause of the event is not clearly determined, then the results of the investigation shall be presented to SORC for thorough review. Upon completion of the SORC evaluation, the Committee shall make recommendations to the General Manager - Salem Operations on reactor startup.

Contrary to the above, on April 23, 1984, the acting Operations Manager approved reactor startup without presenting the investigation to SORC for thorough review and recommendation to the General Manager before reactor startup, after a reactor trip for which the cause had not been clearly determined, even though evidence was available to show that the feedwater flow indication was not as expected and contributed to the cause as determined during a startup on April 29, 1984 following a similar reactor trip on April 27, 1984.

This is a Severity Level IV Violation (Supplement 1) applicable to DPR-75.

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- B. The May 6, 1983 Order Modifying the License immediately required that the licensee implement and/or maintain the items specified in the licensee's letter dated April 28, 1983.

The licensee's April 28, 1983 letter stated that the Master Equipment List (MEL) was required to be verified complete and accurate for Q list systems by May 1983.

Contrary to the above, on May 1, 1984, the MEL was not complete and accurate as indicated in the examples below. Even though the MEL identified the components involved as safety related and functionally safety related components respectively in the non-safety related portion of the feedwater system, misclassifications occurred as result of failure of the MEL to also classify them as components in the safety related protection and engineered safety features actuation systems, respectively.

- a) Work Order MD 946229 was not classified as safety related for replacement of the No. 23 Feedwater Flow Nozzle F-659-2; and,
- b) Work Order MD 946237 was not classified as safety related for work on the No. 23 Feedwater Main Regulating Bypass Valve (23BF40).

This is a Severity Level IV Violation (Supplement 1) applicable to both DPRs 70 and 75.

- C. Criterion 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 12.2.16 of the SGS-UFSAR, the licensee QAP, requires that the General Manager Salem Operations assure that conditions adverse to quality are promptly identified and corrected for activities involving operations.

Contrary to the above, the licensee did not take adequate corrective action for the events reported in LER 311/84-006, in that adequate procedures have not been developed to ensure that rod position indication could be restored in sufficient time so that the 2A and 2C Emergency Diesel Generators could be tested within the one hour required by Technical Specification 4.8.1.1.2.a.2 for events such as the 2B vital bus being deenergized on March 18, 1984.

This is a Severity Level IV Violation (Supplement 1) applicable to DPR-75.

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.