

JUN 19 1984

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

Public Service Electric and Gas Company
ATTN: Mr. Richard A. Uderitz
Vice President - Nuclear
P. O. Box 236
Hancocks Bridge, New Jersey 08038

Gentlemen:

Subject: Inspection 50-311/84-22

This refers to the special resident safety inspection by Messrs. J. Linville and R. Summers on May 29-30, 1984 at the Salem Nuclear Generating Station, Hancocks Bridge, New Jersey. The inspection consisted of document reviews, interviews, and observation of activities. The findings were discussed with Mr. J. M. Zupko, Jr. of your staff.

The apparent violation which is described in the attached report involved the inoperability of the isolation function of the Containment Gaseous Activity monitor. This monitor is required by Technical Specification Limiting Conditions for Operation to be operable to provide automatic isolation of the containment purge and pressure vacuum relief paths in the event of a high radiation level in containment. The isolation function of this monitor was made inoperable by manually blocking the isolation signal which was present at the time, to permit a containment pressure relief. A station procedure was changed by an "on-the-spot change" to permit this activity. In our view, the review of the applicable Technical Specification to determine if this change altered the intent of the procedure was inadequate. Specifically, the technical specifications and the applicable plant procedure provided a clear alternative in that if the affected RMS channel is inoperable the plant vent activity monitor can be used as a substitute with reduced setpoints. Based on our understanding of the situation, the operators involved in this review apparently disregarded this direction and without seeking further guidance elected to alter the intent of the procedure through the use of an "on-the-spot" change.

On another recent occasion we identified a concern with your approach to changing procedures with on-the-spot changes. NRC Inspection Report 50-272/84-08 and 50-311/84-08 detailed a violation of procedures involving "hot leg to hot leg" recirculation for the RHR system during shutdown conditions. Your response to that violation states "that the on-the-spot change does not provide the review process necessary to make a change of this nature". You further concluded that when contemplating methods of operation outside normal established and approved procedures, the review shall determine if the proposed operation potentially involves an unreviewed safety question or "constitutes operation outside of parameters analyzed in the UFSAR or delineated in the Technical Specifications". Since the enclosed report highlights a decision to make an "on the spot" change to a procedure which was outside parameters delineated in Technical Specifications we are concerned that the criteria and guidance provided to the operators for such situations is still not clearly understood.

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Our Inspection Report 50-272/84-15 and 50-311/84-15 dated June 12, 1984 also discusses additional instances in which decisions were made by operations staff personnel apparently without benefit of the appropriate safety review process. Furthermore, the need for additional reviews was identified by the resident inspectors and was apparently not recognized or evaluated by station management. Based on this concern, we have tentatively scheduled an Enforcement Conference for June 29, 1984 at the Region I office. You should be prepared to discuss these matters at that meeting, including your assessment as to whether your Action Plan addresses the causes of these problems and whether solutions will be evident as you implement the resulting program changes. In our view, as evidenced by our observations, your efforts to date have not been fully effective in assuring that the operating staff fully understands the safety review process and how it should be integrated into the daily conduct of operations. We will make our decision relative to enforcement action based on the outcome of this meeting and will forward it under separate correspondence.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed by

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

Enclosure: NRC Region I Report 50-311/84-22

cc:

R. L. Mittl, General Manager - Nuclear Assurance and Regulation
J. M. Zupko, Jr., General Manager - Salem Operations
C. P. Johnson, Manager - Quality Assurance Nuclear Operations
E. A. Liden, Manager - Nuclear Licensing and Regulation
P. M. Krishna, Manager - Nuclear Review Board
M. J. Wetterhahn, Esquire
R. Fryling, Jr., Esquire
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New Jersey

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bcc:
Region I Docket Room (with concurrences)
Senior Operations Office (w/o encls)
Section Chief, DPRP
Director, DETP

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