

July 20, 1984

Docket/License: 50-311/DPR-75
EA No. 84-70

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

Gentlemen:

Subject: Notice of Violation (Inspection Report No. 50-311/84-22)

On June 27, 1984, an Enforcement Conference was held with you and members of your staff at the NRC Region I office to review the circumstances associated with a violation of NRC requirements which occurred at the Salem Nuclear Generating Station, Unit 2. The violation, which was identified by NRC Resident Inspectors, was reviewed during an NRC inspection conducted on May 29-30, 1984. The report of the inspection was sent to you on June 19, 1984. At the enforcement conference, the cause of the violation, its relation to previous occurrences at Salem, and your corrective actions were discussed.

The violation, which is described in the enclosed Notice, involved violation of a technical specification limiting condition for operation in that the automatic isolation function of the Containment Gaseous Activity Monitor was inoperable. This monitor provides automatic isolation of the containment purge and pressure vacuum relief paths in the event of a high gaseous radiation level in containment. The isolation function of this monitor was inoperable in that the isolation signal, present at the time, was manually blocked to permit a containment pressure relief.

The violation occurred because an otherwise permissible "on-the-spot" change was made to a station procedure to permit manual blocking of the isolation signal without adequate review. Specifically, the change, which was authorized by two senior licensed operators, was not adequately reviewed and evaluated by the operators, and did not receive a sufficient level of review by station management, to assure that the change would not result in a violation of the technical specifications. The specific technical specification and the referenced plant procedure would allow manual blocking of the isolation signal and use of the plant vent gaseous activity monitor as a substitute if the setpoints for the plant vent activity monitor were reduced. However, those setpoints were not reduced.

We recognize that the safety significance of this violation, when considered individually, is low since: (1) the automatic isolation function of the plant vent gaseous monitor was operable, although at the higher setpoints; (2) the plant vent gross activity monitor was operable throughout the period with a conservative alarm setpoint, and if a high level release occurred, existing procedures require manual isolation of the plant vent; and (3) the automatic isolation signals were operable for the particulate and iodine monitors for both containment and the plant vent. Therefore, in accordance with the revised

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NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register (49 FR 8583) on March 8, 1984, the violation has been classified at Severity Level IV.

Nonetheless, the cause of the violation, namely, inadequate review and evaluation of an "on-the-spot" change to a procedure, is of significant concern to the NRC, particularly in light of a recent violation described in Inspection Report 50-272/84-08 which similarly involved inadequate review and evaluation of an "on-the-spot" change. Accordingly, a civil penalty could have been issued for this Severity Level IV violation. However, we have exercised our discretion under the NRC Enforcement Policy and have decided not to issue a civil penalty in this case. Similar examples of inadequate review and evaluation of "on-the-spot" changes in the future may result in additional enforcement action.

You are required to respond to the enclosed Notice and you should follow the instructions specified therein in preparing your response. In your response, you should describe the specific actions taken or planned to improve your safety review process, and its implementation. Also, in view of the above concerns, you should consider acceleration of any ongoing reviews you have in process in this area. This should include any related action plan items or any other actions you have planned. Please include the accelerated schedule in your response.

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.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original Signed By:

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

Enclosure: Notice of Violation

cc w/encl:

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

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bcc w/encl:
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DPRP Section Chief
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