



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

Nuclear Department

August 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:

COMBINED INSPECTION REPORT 50-272/84-23 AND 50-311/84-23
SALEM GENERATING STATION
UNITS NO. 1 AND 2
DOCKET NOS 50-272 AND 50-311

During the referenced inspection conducted from June 9 to July 6, 1984, a violation was observed involving failure to have a procedure to perform the functional testing of mechanical snubbers and failure to perform a SORC review of a vendor test procedure prior to implementation. The following are PSE&G's responses to this Notice of Violation.

Item A

Technical Specification 6.8.1.c requires that written procedures covering surveillance and test activities of safety related equipment shall be established.

Contrary to the Above:

On July 5, 1984, it was determined that no procedure had been established to perform the functional testing of safety related equipment, mechanical snubbers, as required by Technical Specification Surveillance Requirement 4.7.9.c and e.

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Reply to Item A

Even though there was not any implementing procedure, functional testing of both mechanical and hydraulic snubbers was performed in accordance with the Technical Specification testing requirements and reported to the NRC in the Ninety Day report required by ASME Section XI. All work was properly documented and reviewed by the Nuclear Operations Quality Assurance.

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Due to the nature of the deficiency and the fact that the objective of the Technical Specification surveillance testing was met, there was no immediate corrective action.

PSE&G recognizes the need to have implementing procedures to comply with Technical Specification 4.7.9.c and e to cover the functional testing of hydraulic and mechanical snubbers.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Nuclear Site Maintenance Procedure, M9-IAP-2, In-Service Inspection Program is being revised to address Technical Specification 4.7.9.c and e, functional testing of snubbers. An additional Nuclear Site Maintenance procedure shall be written that implements Technical Specification 4.7.9.c and e. This action will ensure that the evaluation of functional snubber test reports is in full compliance with the Technical Specification requirements.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

We will be in full compliance by November 1, 1984.

Additional Item

In addition, AP-3, "Document Control Program" requires that all procedures used on-site, on safety related equipment be recommended for approval by SORC and approved by the General Manager - Salem Operations.

Contrary to the Above:

On July 2, 1984, the Wyle Mobile Laboratory arrived on site to conduct the functional testing of mechanical snubbers using their own procedure (6108-545 Rev. B). Functional testing was commenced prior to review and approval of the procedure by SORC and the General Manager.

Reply to Additional Item

Procedure M9-IAP-1, Administrative Instructions requires that vendor procedures be processed through SORC regardless of how they are used on site. The use of Wyle's mobile snubber testing facility on site was regarded as an extension of their home office facility. The work involved was originally contracted to be done at the home office facility in Huntsville, Alabama, and it was not until additional testing became necessary, that the mobile unit was requested. Off site vendor procedures are not required to be SORC reviewed.

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

While Wyle was on site, a Stop Work Order was placed on their operations until their procedure was reviewed and approved through proper channels.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

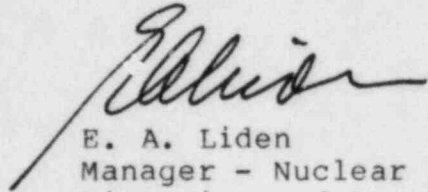
Nuclear Site Maintenance Procedure M9-IAP-1, Administrative Instructions, will be revised to clarify the review and approval requirements of vendor procedures used at Salem Station. The importance of this matter shall be stressed to appropriate personnel.

8/24/84

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

We will be in full compliance by October 1, 1984.

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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