



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

Nuclear Department

August 20, 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 INSPECTION REPORT NO. 50-311/84-22
SALEM GENERATING STATION
NO. 2 UNIT
DOCKET NO. 50-311

The referenced inspection, conducted on May 29-30, 1984, identified one violation of a Technical Specification limiting condition for operation (LCO) for failure to maintain the pressure-vacuum relief valves closed with the Containment Gaseous Activity Monitor inoperable. It appears that this violation was caused by inappropriate use of the procedure for On-the-Spot Changes to procedures. The following is PSE&G's response to the Notice of Violation.

ITEM OF VIOLATION

Technical Specifications 3.3.2, 3.3.3.1 and 3.9.9 require that the containment gaseous radiation monitor be operable, or the plant vent gaseous radiation monitor be operable with reduced setpoints, to provide automatic purge and pressure-vacuum relief isolation capability during the plant venting operations. If these conditions are not met, each of the purge and pressure-vacuum relief penetrations providing direct access from the containment atmosphere to the outside atmosphere are to be kept closed.

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Contrary to the above:

On May 28, 1984 between 7:15 p.m. and 8:15 p.m., the containment gaseous radiation monitor was inoperable in that the isolation signal was blocked, and the plant vent gaseous radiation monitor isolation setpoint was not reduced, resulting in a loss of this automatic purge and pressure-vacuum relief isolation capability, and during this period, penetrations which provide direct access from the containment atmosphere to the outside atmosphere were not closed and a containment venting operation was conducted.

Response to Item of Violation

On May 28, 1984, a Containment Pressure Relief was performed. Prior to performing the pressure relief, the isolation function for the 2R12A radiation monitor was blocked, rendering it inoperable. The Unit 2 Technical Specifications allow for this provided that the setpoints for the 2R41C radiation monitor are lowered. However, the setpoints were not lowered and the pressure relief was performed in accordance with an On-the-Spot Change to the Containment Ventilation procedure. During the pressure relief, the operators monitored RMS channels 2R16 and 2R41C and estimated the release to be approximately 1% of the Technical Specification limit.

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

The supervisor responsible for this action was counseled.

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

The incident and the proper use of On-the-Spot Changes are being reviewed with all shift supervision. In addition, a Special Task Force has been formed to review the safety review process presently utilized for the Station, and to make recommendations, if necessary, for its improvement. This Task Force is considering specific OTSC review criteria for use in determining that no unreviewed safety questions exists, and that the intent of a procedure is not changed.

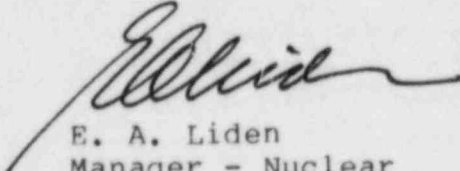
Public Service Electric and Gas (PSE&G) has a parallel effort in progress to obtain a License Amendment that will remove routine station department procedures and revision reviews from SORC's functions. This will place that responsibility with an independent departmental review system and will allow compliance with the review criteria to be given more detailed scrutiny. It is anticipated that the recommendations of the Task Force can be more thoroughly implemented by independent reviewers at the station department levels. In addition, Action Plan 2.2.1, "Safety Review Management," recommendations to enhance the safety review process parallel those of the Special Task Force and should result in an enhanced safety review process, with specific emphasis on determination of unreviewed safety questions.

C. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Shift Supervisor reviews on the use of OTSCs will be completed by September 1, 1984.

The Special Task Force report will be completed by September 1, 1984. The approved recommendations will be correlated as much as practical with the implementation schedule for Action 2.2.1, but in any event will be implemented by October 31, 1984.

Sincerely,



E. A. Liden
Manager - Nuclear
Licensing and Regulation

C Mr. Donald C. Fischer
Licensing Project Manager

Mr. James Linville
Senior Resident Inspector