

AUG 22 1984

Docket Nos. 50-272
50-311

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: Combined Inspection 50-272/84-15, 50-311/84-15

This refers to your letter dated July 13, 1984, in response to our letter dated June 12, 1984.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

With respect to your reply to item B of the report, we agree that the violation as stated may be in error. However, the fact remains that nonconservative misclassifications of work did occur, a point with which you agree as indicated by your proposed corrective action. We have considered your justification for the misclassifications and corrective actions and have decided that the actions are incomplete. Since personnel from a number of different departments, including Maintenance, Operations, Engineering and Quality Assurance, were all involved, to some degree, in the review and approval of the misclassified work orders, it appeared that the MEL must have been in error. However, in your response, you clearly indicate that the MEL was correct and the problem arose because these personnel were unfamiliar with the classification logic and affected equipment for the classification "functionally safety related" as detailed in memorandum CD-M-60, which is appended to the MEL instructions. This unfamiliarity could have been prevented by complete and appropriate training in the use of the MEL for classifying work orders. For this reason, we have attached a revised Appendix A, Notice of Violation, which addresses improper training of appropriate personnel in the use of the MEL as required by the May 6, 1983, Order Modifying the License Effective Immediately. Item B in Appendix A to our June 12, 1984 letter is withdrawn.

We find that your proposed corrective actions in response to Item B will provide a sufficient level of training to preclude recurrence; however, we are concerned that safety related equipment, such as that listed in CD-M-60, may not have been maintained so as to enhance safety. Since QA personnel were unfamiliar with CD-M-60 requirements, any misclassifications that occurred would not have been identified by their review. In addition, since personnel from the Engineering Department were involved, we question the method of

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referring to the sponsor engineer for proper classification. Finally, since your corrective actions do not address the degree to which misclassifications have occurred; we expect that your response will address this issue and, any actions necessary to prove operability of any equipment, either listed in CD-M-60 or otherwise, that may have been improperly classified and maintained.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure 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.

The responses directed by this letter and the accompanying 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.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

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

Enclosure: Appendix A, Notice of Violation

cc w/encl:

The Honorable Joseph R. Biden, Jr

J. Rodriguez

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

R. Fryling, Jr., Esquire

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
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
NRC Resident Inspector


State of New Jersey

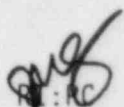
bcc w/encl:
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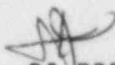
DPRP Section Chief
Director, DETP



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