



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

Nuclear Department

August 9, 1984

U. S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs

Dear Mr. Martin:

NRC COMBINED INSPECTION 50-272/84-16 AND 50-311/84-16
SALEM GENERATING STATION
UNITS NO. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

During the referenced inspection, conducted from April 30 to May 4, May 8-10, and May 18, 1984, two violations were identified concerning failure to take adequate corrective actions and failure to follow procedures. The following is PSE&G's response to the Notice of Violation.

NOTICE OF VIOLATION

Item A

10 CFR 50, Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

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The May 6, 1983 Order Modifying the License requires in part that:

"The licensee shall implement and/or maintain the items specified in Attachment 1 to this Order, as more fully described and in the manner described in the licensee's submittals dated March 14, April 4, and April 7, and 8, 1983, no later than the dates specified in Attachment 1,"

Attachment 1 to the Order, item C.2.b.1 requires that PSE&G "Verify completeness and accuracy of MEL for remaining O list systems and reissue as a controlled document by May 1983".

Contrary to these requirements:

Subsequent to May 1983, PSE&G management failed to take adequate measures to correct discrepancies in the Master Equipment List, so that the list is complete, accurate and that personnel clearly understand its proper use.

Response to Item A:

The process that exists for addressing items questioned on the MEL is defined in the instructions for use of the MEL. The MEL was one of the source documents used in the development of the Managed Maintenance Program (MMP). MEL questions raised under MMP were addressed under the existing process. The questions raised on MEL, when received by Nuclear Engineering, were referred to the appropriate sponsor engineers for dispositioning as necessary. The dispositioning of these questions was not as prompt as it should have been in all cases. PSE&G will modify the current process and require more prompt dispositioning and more active follow-up of the MEL questions. ~~Management involvement with items not promptly dispositioned will be specified.~~ This will be in place by September 1984.

The MEL Update Program that was in effect at the time of the referenced NRC Inspection was to issue an updated MEL every six (6) months. PSE&G recognized the inadequacy of this update cycle and has instituted a program wherein monthly MEL updates in the form of page changes will be issued to controlled copyholders, with complete reissue on a bi-annual basis. Additionally, a program is under way to convert the various MEL sections to a common computer data base. This is expected to be completed by January 1985.

Valves are not to appear on both mechanical and control valve master equipment lists (MEL). During development of the mechanical MEL, all valves, both mechanical and controls, were listed in order to preclude inadvertent omission; then the control valves were deleted from the list. The three "WG" valves identified in the May 8 MMP discrepancy letter appear to be isolated cases of control valves not being deleted from the mechanical MEL. To ensure that these are in fact isolated cases, a review will be made of the two valve lists. This will be completed by September 1984.

The "CAA" and "CBV" items from the May 8 letter are HVAC dampers. The original philosophy in development of the listings for dampers was that the damper body was listed on the mechanical MEL, and the damper operator was listed on the controls MEL. The classification inconsistencies will be corrected along with the other MMP identified discrepancies. Additionally, a specific review to ensure consistency of damper and damper operator classifications will be completed by September 1984.

The report refers to the work orders associated with removal of the No. 23 Feedwater Nozzle on April 29, 1984. The work order for removal of the pipe spool piece containing the nozzle was correctly classified as non-safety related. The pipe is part of the Feedwater System in the Turbine Building and is, in fact, non-safety related. The only error associated with the work done on the removal of this spool piece and the internal feedwater nozzle was that the initial cutting of the instrument lines connected to the feedwater nozzle was done as non-safety related work and should have been classified as safety-related. Subsequent work on reinstallation of the spool and reconnection of the flow nozzle instrument tubing was correctly done as non-safety related and safety-related respectively.

It is the position of PSE&G that the work order classification questions associated with this occurred due to personnel unfamiliarity with the fact that certain limited numbers of controls components which provide input to the reactor protection system for reactor trip or perform functions initiated by the protection system are located in the turbine building and by the very nature of their location are not generally understood to be safety-related equipment. The detailed logic for this classification and a listing of the specific equipment is contained in a document, CD-M-60, which is included in the MEL Instructions issued with the MEL, but which is not required to be consulted directly when making equipment classifications. Therefore, the unfamiliarity with the CD-M-60 equipment exists.

To preclude recurrence of this type of misclassification, the following actions have been taken or will be taken:

1. A training program was presented to station personnel who classify work orders and to appropriate Quality Assurance and Nuclear Engineering personnel to explain the existence of certain safety-related equipment in the turbine area.
2. The MEL Systems List which is utilized in making classifications has been modified to specifically highlight Systems which contain safety-related components in plant areas that are not normally associated with safety functions.
3. Additional training will be developed and provided to sponsor engineers for clarification of component classification and guidelines to assist in such classification and assure consistency in classification. This will be completed by November 1984.
4. A Quality Assurance audit of the MEL and its use within the Nuclear Department was planned for 1984 at the request of the Nuclear Review Board, and is currently scheduled to be conducted in November.

PSE&G will be in full compliance with the above by January 1985.

In summary, it is the position of PSE&G that the items identified under the Managed Maintenance Program did not constitute a major generic inadequacy in the MEL and were being addressed by a process that would adequately correct any errors identified and that this in conjunction with the monthly MEL Update Program does adequately address the concerns identified in this referenced inspection report.

Item B

Technical Specification 6.8.1 and Regulatory Guide 1.33, Revision 2, November 1978, require development and implementation of procedures to protect safety-related items from damage and deterioration.

Procurement and Material Control Procedure, M11-P-500, Paragraph 4.2, requires that each safety-related item be classified for proper storage. Paragraph 4.4 defines the storage requirements for each of the storage classifications.

Contrary to these requirements:

On May 9, 1983, the licensee had two safety-related components, a Chem Pump, folio number 33-7033, and a type D Regulator, folio number 40-8131, classified for level "A" storage, stored in the warehouse in less than a level "A" storage area. In addition, two items, folio numbers 60-6270 and 60-6273, were classified for level "B" storage, but were stored outdoors in less than a level "B" storage area.

Response to Item B:

Investigation of the identified items revealed that all material was stored in appropriate storage levels. In each case the storage level identified on the inspection release tag was incorrect, i.e., the Chem Pump was stored in the appropriate storage level "B" although the storage level was incorrectly identified as level "A" on the inspection release tag.

The cause of the discrepancy is attributed to improper identification of the required storage level on the inspection release tag by warehouse personnel.

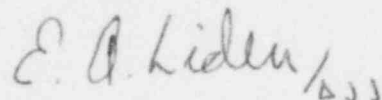
To preclude recurrence of this type of incorrect identification, the following steps have been or will be taken:

1. Procedure M11-P-500 has been reviewed with appropriate warehouse personnel with emphasis on the importance of proper identification of the correct storage level.
2. The material storage requirements have been reviewed and show that no equipment with the exception of selected measuring and test equipment should be identified as requiring level "A" storage. All material currently stored in less than "B" storage conditions has been physically verified as appropriately stored.
3. All material currently in storage will be reviewed to ensure proper identification of the required storage level on the appropriate tag. This will be conducted on a class by class basis as material is relocated to permanent storage locations. This activity is anticipated to be completed by January 1985.

4. The Quality Assurance Program will be revised to provide for OA verification of the storage level identified on the appropriate tag. Appropriate procedural changes will be accomplished by September 1984.

PSE&G will be in full compliance by January 1985.

Sincerely,



E. A. Liden
Manager - Nuclear
Licensing and Regulation

C Mr. Donald C. Fischer
Project Licensing Manager

Mr. James Linville
Sr. Resident Inspector

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