



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

Nuclear Department

September 21, 1984

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

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

Dear Mr. Starostecki:

SUPPLEMENTAL RESPONSE
NRC COMBINED INSPECTION 50-272/84-15 AND 50-311/84-15
SALEM GENERATING STATION
UNITS NO. 1 AND 2
DOCKET NOS. 50-272 AND 30-311

During the referenced inspection, a violation was identified for failure to develop a complete and accurate Master Equipment List (MEL). As a result of our response, dated July 13, 1984, the original violation has been revised to address improper training of appropriate personnel in the use of the MEL. PSE&G hereby provides a supplemental response to the item of violation:

ITEM OF VIOLATION

- A. The May 6, 1983 Order Modifying the License Effective Immediately required that the licensee implement and/or maintain the items specified in the licensee's letter dated April 28, 1983.

The licensee's April 28, 1983 letter stated that the following corrective actions were complete:

1. Instruct appropriate personnel in purpose and use of MEL (C.1.a.2); and,

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2. Conduct a training program to ensure that work orders are properly classified (C.3.a.2).

Contrary to the Above:

Personnel involved with classifying Work Orders MD946229 and MD946237 were not properly trained in the classification logic detailed in memorandum, CD-M-60 which is an addendum to the MEL, in that the work orders were not properly classified as safety-related.

RESPONSE:

In our response, dated July 13, 1984, the following corrective actions were proposed:

1. Develop and present a specific training program for appropriate personnel to ensure familiarity with the existence of certain safety-related components in the turbine area.
2. Modify the MEL Systems List to highlight the existence of these components.
3. Provide more frequent issuance of MEL revisions.

These corrective actions are now complete.

The revised notice of violation accepted the PSE&G proposed corrective action in the area of training as being sufficient to preclude recurrence; however, it requested resolution in the following areas of concern:

- a. assurance as to the adequacy of utilizing sponsor engineers to provide classifications
- b. assurance that safety-related equipment, such as that listed in CD-M-60, was maintained so as to enhance safety
- c. the degree to which misclassifications have occurred and actions necessary to prove operability of equipment that may have been improperly classified and maintained.

We have examined our method of referring to sponsor engineers for proper classifications, and conclude that this remains the best available information source for resolution of apparent conflict. The training program conducted served to reinforce sponsor engineer (as well as OA and Station personnel) awareness of CD-M-60 type equipment, and we are confident that future errors of the type identified will not occur.

In order to ascertain the performance of proper installation and maintenance, and continued operability of CD-M-60 equipment, for which work orders may have been misclassified, a review of the work order history on this equipment is being performed.

For any equipment which is found to not have been installed or maintained in accordance with appropriate safety-related type procedures or using appropriate materials, an evaluation as to a need for specific corrective action to assure continued operability will be made and such action performed.

As you are aware, PSE&G is developing a formalized preventive maintenance program. During the various reviews that were conducted for that program, a number of inconsistencies in the Master Equipment List were identified and documented. Although a relatively small percentage of the inconsistencies identified constituted nonconservative classifications of equipment, it is conceivable that they could have resulted in nonconservative work order classifications. To provide further assurance that safety-related equipment remains operable, the work order history for this equipment is being reviewed in a manner similar to that described above for the CD-M-60 equipment, and appropriate corrective actions will be taken.

We are currently approximately 58% through the aforementioned review efforts, which involve approximately 133 work orders. To date, only 23 non-conservatively classified work orders have been found, and these have been evaluated as not requiring corrective action to ensure operability.

In order to assure the operability of any equipment which, in the future, may be identified as having nonconservative classifications, formal procedural requirements will be instituted to perform a review and resolution of the specification, procurement, installation, test and maintenance of such equipment.

We anticipate that the above actions will be complete by November 1, 1984, after which time you will be notified of final results.

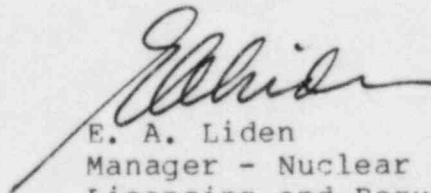
PSE&G is keenly aware of the vital importance of the correctness and completeness of the MEL, as it is a major source document used in assuring proper procurement, installation, maintenance, and operability of safety-related plant systems, structures, and components. We are currently undertaking a comprehensive program to enhance many aspects of our operations associated with the MEL. Some major facets of this program involve:

- enhanced "user friendliness" through on-line computerization and restructuring of data
- enhanced training in understanding and using the MEL
- development of enhanced guidelines and training for Sponsor Engineers to assist and ensure consistency in classifications
- review of industry experience in applications of MEL-type documents for potential use at PSE&G

We feel that the aforementioned specific corrective actions, and our dedication to longer term, overall improvement of MEL associated programs will help assure efficient, safe, and correct conduct of our Nuclear Operations.

If you have any questions, please feel free to contact us.

Sincerely,



E. A. Liden
Manager - Nuclear
Licensing and Regulation

C Mr. Donald C. Fischer
Licensing Project Manager

Mr. James Linville
Sr. Resident Inspector