

APPENDIX A

NOTICE OF VIOLATION

Public Service Electric and Gas Company  
Salem Nuclear Generating Station  
Units 1 and 2

Docket Nos. 50-272  
50-311

License Nos. DPR-70  
DPR-75

As a result of the inspection conducted on September 17-21, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

- A. Section 6.5.1.6 of the Unit 1 and 2 Technical Specifications requires that the Station Operations Review Committee review all procedures required by Specification 6.8 and changes thereto. Section 6.8.1 requires that written procedures shall be established, implemented and maintained for surveillance and test activities of safety related equipment. Administrative Procedure 3, "On-The-Spot Change", requires that if changes are made to procedures while in use for the performance of tests, these changes must be documented on Form AP-3-1, and then must be subjected to post-change review, including that of the department head, the site quality assurance engineer, the SORC chairman, and the station manager.

Contrary to the above, during July 1984, on-the-spot changes were made to several safety related air filtration system in-place testing procedures, without obtaining the post-change review by the department head, the site quality assurance engineer, the SORC Chairman, and the station manager. The Operational Test Group performed on-the-spot changes to revision 0 of procedure numbers M9-TVP-CR-001, M9-TVP-AB-011, M9-TVP-AB-012, and M9-TVP-AB-013 without obtaining the required review.

This is a Severity Level IV violation (Supplement I).

- B. Section 6.4 of the Unit 1 and 2 Technical Specifications requires, in part, a retraining program for the facility staff that meets or exceeds the requirements of Section 5.5 of ANSI N18.1 - 1971. Section 5.5 of ANSI N18.1 - 1971, states that means should be provided in the training programs for appropriate evaluation of its effectiveness. Section 5.5.1 states that the retraining program should include, among other items, normal plant operating conditions and procedures, and operation of selected auxiliary systems important to overall plant safety. Administrative Procedure No. 14, Rev. 4, "Station Training Program", implements these requirements. Administrative Procedure 14 states, in part, "The job performance of inspection, examination and testing personnel shall be evaluated initially and at two year intervals. The results of each evaluation shall be reviewed and documented by the department head..."

Contrary to the above, the Certificate of Qualification for a Chemistry Technical Assistant had expired on June 25, 1984, and the required requalification training was not provided in accordance with Procedure AP-14.

This is a Severity Level V violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.