

APPENDIX A

NOTICE OF VIOLATION

Public Service Electric and Gas Company  
Hope Creek Generating Station

Docket No. 50-354  
License No. CPPR-120

As a result of the inspection conducted on December 17, 1984, - January 27, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion XII, and Hope Creek Generating Station administrative procedure SAP-19, Revision 4, require measures to assure that measuring and test devices used in activities affecting quality are properly controlled.

Contrary to the above, as of January 11, 1985, the inspectors identified that measuring and test devices were not adequately controlled to provide sufficient assurance of their proper and traceable use, in that:

- A. SAP-19 requires that portable test equipment shall remain exclusively in the possession and control of the individual to whom issued. However, calibrated portable test equipment was commonly transferred between workers in the field.
- B. SAP-19 requires all measuring test equipment (MTE) to be issued by the Startup Test Equipment Coordinator (STEC). However, MTE has commonly been issued on backshifts, in absence of the STEC, through MTE trailer access provided by the operating shift. No procedural guidance is provided in this area.
- C. SAP-19 requires that, if MTE is signed out for an extended period, MTE log cards shall be submitted weekly. However, as of January 11, 1985, one 1000-volt megger had been checked out for over three weeks, and no MTE log cards had been submitted. Also, several pressure gages (#812, 815, 066, 654, and 655) had been signed out since October 1984, and no log cards had been submitted.
- D. SAP-19 requires personnel to update MTE log cards daily for equipment in their possession and to submit the log card upon return of equipment. The usage record is then maintained via the log cards or a computer record. However, as of January 11, 1985, no log cards or computer records were on file for usage of gage numbers 066, 654, and 655 during October 4 - 10, 1984. Also, the inspector observed on January 11, one technician returning equipment without a log card and two persons filling out the card from memory upon return.

- E. SAP-19 requires calibration of MTE on schedule. Fixed MTE may remain in a fixed location for the duration of a test if it remains in calibration. However, numerous gages (including 066, 654, 655, 812, and 815) were not calibrated on schedule and were allowed to remain in fixed locations beyond the calibration due dates.

This is a Severity Level IV violation.

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas Company is hereby required to submit to this office within 30 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.

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