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March 12, 1985

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

Attention: Mr. Samuel J. Collins, Chief
Projects Branch No. 2
Division of Project and Resident Programs

Gentlemen:

NRC INSPECTION 50-272/84-47 AND 50-311/84-47
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

The referenced inspection, conducted from December 15, 1984 to January 22, 1985, identified two violations, the first involving the failure to follow radiation protection procedures for documenting personnel contamination surveys and the second identifying a failure to follow the Administrative Procedure for control of maintenance activities. The following is PSE&G's response to the Notice of Violation:

NOTICE OF VIOLATION

Item A

Technical Specification 6.11 requires that procedures for personnel radiation protection be adhered to for all operations involving personnel radiation exposure.

Radiation Protection Procedure 1.006, Decontamination of Personnel, requires that incidents of personnel contamination be recorded in the shift TN log and that survey results be documented on a personnel survey map.

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Contrary to the Above:

There was no record in the shift TN log and no survey results documented on a personnel survey map for a contractor employee assigned security badge number 900-208, who was contaminated at about 2:30 am on December 18, 1984.

Response to Item A:

Examination of existing documentation indicates that appropriate radiological control area precautions were being maintained. It is believed, however, that the title of the Radiation Protection Procedure RP 1.006, "Decontamination of Personnel," misled the radiation protection technician since no personnel decontamination was actually required. Due to the extremely short lived nature of the rubidium 88 (Rb-88), personnel are simply detained until the contamination decays. Due to the insignificance of the dose associated with Rb-88 and the method of handling personnel contaminated with Rb-88, documentation was not contemplated and therefore not performed. The procedure does, however, require a survey map and log entries for all personnel contamination, regardless of the type of contamination.

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

A directive has been placed in the Radiation Protection Department's required reading book to reinforce the requirements of RP 1.006 for documenting all personnel contaminations regardless of the source of contamination. RP 1.006 will continue in effect until the Radiation Protection Procedure RP 1.027, "Handling of Contaminated Personnel," is developed and implemented. No incidents of this nature have occurred since this step was taken.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

A new procedure RP 1.027 is being developed which will incorporate specific guidance for handling personnel contaminated with short lived activity as well as those applicable portions of RP 1.006.

3. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Because of the interim steps taken to insure compliance with the existing radiation protection procedures, we are now in full compliance. Radiation Protection Procedure RP 1.027, "Handling of Contaminated Personnel," an enhancement to our program, will be implemented by April 30, 1985.

Item B

Technical Specification 6.8.1 requires that written procedures, as recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, shall be implemented.

Appendix "A" of Regulatory Guide 1.33, Revision 2 requires maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures.

Section 5.2 of Administrative Procedure No. 9, Maintenance Program, states that maintenance shall be scheduled and planned so as not to jeopardize the safety of equipment.

Contrary to the Above:

On January 9, 1985, maintenance was scheduled and begun on the vital heat trace of No. 12 Boric Acid Transfer Pump while the redundant pump was inoperable, which jeopardized the safety of both the Boron Injection Tank recirculation flow path and the required boration flow path for reactivity control.

Response to Item B:

On January 2, 1985, a seal leak was identified on No. 11 BAT pump. Permission was given to start the repair work on January 7, 1985, during the day shift (0700 to 1600 hours). During the second shift (1600 to 2400 hours), a work order to begin troubleshooting the heat trace circuits associated with No. 12 BAT pump was approved. The shift supervisor did not anticipate that this troubleshooting activity would affect the operability of the heat trace circuits. The actual work on the heat trace circuits was not begun until January 9, 1985. The specific actions to complete the troubleshooting were not brought to the attention of the shift supervisor by the

personnel performing this work. When the January 9th day shift was informed that work was being performed on both BAT pumps, they entered the action statement for ECCS heat tracing per LCO 3.5.4.2B. The shift determined that the boron injection tank remained operable during the time the temperature was low by verifying flow through the recirculation flow path.

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Prior to this event, the need for an improved means to keep the shift supervisor informed of maintenance activities had been recognized. In addition to the efforts underway to improve the work order list, a daily department engineers meeting was initiated, as previously planned, to develop and formalize maintenance activities for the day on the operating unit. This action provided sufficient corrective action to address this violation. These plans are communicated to the shift supervisors to assure that shift personnel are aware of maintenance activities. The operating shifts have been advised, via the daily newsletter, to be especially cognizant of maintenance activities. Likewise, the need to keep the shift supervisor aware of maintenance activities associated with or affecting safety-related equipment is being reinforced with maintenance personnel.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

No additional corrective steps are required. However, the review of the work order and maintenance planning processes are currently in progress. Enhancements to administrative procedures and planning activities when identified, will be incorporated into plant operations relating to maintenance planning, monitoring and control.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Because of the corrective actions taken to assure compliance with our technical specifications and administrative procedures, we are now in full compliance.

Sincerely.

R A Uderitz / JTB

Mr. Samuel J. Collins

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C Mr. Donald C. Fischer
Licensing Project Manager
Senior Resident Inspector