

Public Service
Electric and Gas
Company

Steven E. Miltenberger
Vice President -
Nuclear Operations

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 339-4199

February 26, 1988
NLR-N88032

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-354/87-29
DOCKET NO. 50-354
HOPE CREEK GENERATING STATION

Public Service Electric and Gas Company (PSE&G) is in receipt of your letter, dated January 28, 1988, which transmitted a Notice Violation involving a failure to comply with the requirements of an approved station procedure.

Pursuant to the provisions of 10 CFR 2.201, our response to the Notice of Violation is provided in Attachment 1.

Sincerely,



Attachment

C Mr. W. T. Russell, Administrator
USNRC Region I

Mr. G. W. Rivenbark
USNRC Licensing Project Manager

Mr. R. W. Borchardt
USNRC Senior Resident Inspector

Mr. D. M. Scott, Chief
Bureau of Nuclear Engineering
Department of Environmental Protection
380 Scotch Road
Trenton, NJ 08628

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ATTACHMENT 1

10 CFR 2.201 INFORMATION
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HOPE CREEK GENERATING STATION
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NUMBER 50-354/87-29

As described in Appendix A of your January 28, 1988 letter, Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes Administrative Procedures.

I&C Calibration Procedure IC-DC.ZZ-175(Q), "Tavis Pressure Transducer, Model P-8C Device Calibration", specifies correct system restoration including an independent verification of system lineup at the conclusion of the device calibration.

Contrary to the above, procedure IC-DC.ZZ-175(Q) was improperly performed, in that, the flow transducer was not correctly returned to service. Additionally, the independent verification of system lineup failed to identify the discrepancy.

1. PUBLIC SERVICE ELECTRIC AND GAS COMPANY DOES NOT DISPUTE THE VIOLATION.
2. THE ROOT CAUSE OF THE VIOLATION WAS PERSONNEL ERROR IN NOT COMPLYING WITH THE PROCEDURE.

On December 4, 1987, the 'B' Filtration, Recirculation and Filtration System (FRVS) recirculation fan flow transmitter was found isolated while difficulties were being experienced with starting and running the recirculation fan. This event was caused by a lack of strict procedural compliance on the part of the I&C technicians responsible for the performance of the calibration and return to service of the subject instrument.

While this violation of a station procedure was licensee identified, it was cited as a violation due to recurring problems in the area of procedural compliance.

ATTACHMENT 1 (CONT'D)

3. IMMEDIATE CORRECTIVE ACTIONS:

The instrument was properly restored to service and 'B' FRVS recirculation fan was demonstrated OPERABLE.

The I&C technicians (contractors) involved in this event received formal reprimands and disciplinary suspensions.

This event was reviewed with all maintenance controls supervisory personnel and technicians in a group meeting with the Maintenance Manager.

4. ACTIONS TAKEN TO PREVENT RECURRENCE:

As described in our response to Notice of Violation 50-354/87-23-01, which also involved procedural compliance problems, a multi-disciplined working group, chaired by the Maintenance Manager, has been established and is charged with the investigation and development of methods to ensure procedural compliance.

5. WE ARE IN FULL COMPLIANCE.