Public Service
Electric and Gas
Company

Corbin A. McNeill, Jr.
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Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 339-4800

January 15, 1988
NLR-N88008

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

Gentlemen:

REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-354/87-17
DOCKET NO. 50-354
HOPE CREEK GENERATING STATION

Public Service Electric and Gas Company (PSE&G) is in receipt of your letter, dated December 18, 1987, which transmitted a Notice Violation identifying two violations. The first violation involved a failure to comply with a Technical Specification limiting condition for operation. The second violation concerned a failure to comply with the requirements of an approved station procedure for equipment control.

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 50-354/87-17

ITEM A

One of the violations identified in your letter dated December 18, 1987 involved the failure to comply with a Limiting Condition for Operation (LCO) in Technical Specification 3.3.3 and Table 3.3.3-1. As described in the Notice of Violation, the LCO for the Automatic Depressurization System (ADS) requires that whenever the reactor is in Operational Condition 1,2 or 3, two residual heat removal (RHR) pump discharge pressure instruments per pump shall be operable to satisfy the ADS actuation permissive logic. With less than two pressure instruments per pump operable, the affected pump must be declared inoperable... and, pursuant to the requirements of LCO Action Statement 3.5.b.1, with one RHR pump inoperable, operation of the reactor may continue for not more than 30 days, provided that at least one core spray system is operable.

Contrary to the above requirements, for some period of time after April 10, 1987 until July 11, 1987, while the reactor was in Operational Condition 1, the two discharge pressure instruments for the "C" RHR pump were inoperable because the isolation valve for transmitters PTN055H and PTN056D was closed and the "C" RHR pump was not declared inoperable. Since the transmitter isolation valve was last verified open on April 10, 1987, the "C" RHR pump is considered to have been inoperable for more than 30 days.

ITEM B

The second violation described in Appendix A of your December 18, 1987 letter involved a failure to comply with an approved station procedure in that, Operations Department Administrative Procedure OP-AP.ZZ-108(Q), "Removal and Return of Equipment to Service" requires that applicable Technical Specifications LCOs be reviewed to determine if equipment status requires entry into an action statement.

Contrary to the above, two instances were cited in the Notice of Violation where the review of the LCOs was not adequate... resulting in the station not entering required action statements for Technical Specifications Sections 3.3.3 and 3.5.1.

ATTACHMENT 1 (CONT'D)

1. PUBLIC SERVICE ELECTRIC AND GAS COMPANY DOES NOT DISPUTE THESE TWO VIOLATIONS.

2. THE ROOT CAUSE OF BOTH VIOLATIONS HAS BEEN DETERMINED TO BE INSUFFICIENT MANAGEMENT CONTROL OF EQUIPMENT ALIGNMENT.

   AN ADDITIONAL IMPORTANT OBSERVATION WAS A NEED TO IMPROVE THE QUALITY OF ROOT CAUSE EVALUATIONS AND CORRECTIVE ACTIONS.

3. IMMEDIATE CORRECTIVE ACTIONS:

   The Operations Manager issued a letter to all operators and held small group meetings to review the recent valving and switching errors.

   Quarterly shift meetings, conducted by the General Manager - Hope Creek Operations, were implemented to discuss the concerns of licensed and non-licensed operators and to identify issues needing management support.

   The General Manager - Hope Creek Operations issued a letter to all personnel clarifying responsibilities for plant operations. Department managers held small group meetings to review responsibility for equipment operations.

   The Operations Manager revised procedure OP-AP.ZZ-109(Q), "Equipment Operational Control" to address partial system restorations prior to returning equipment to service. This change will ensure that valves that require repositioning during equipment repair or surveillance testing are either controlled by safety tagging (TRIS) or procedurally addressed for proper alignment after the equipment is released for return to service.

   Retraining, during requalification training for licensed and non-licensed operators, on recent valve and control problems throughout the industry was commenced and will be completed by February 1, 1988.

3. IMMEDIATE CORRECTIVE ACTIONS (Cont'd)

A Nuclear Department Incident Assessment/Human Performance Evaluation/Scram Response Task Force, chaired by the General Manager - Hope Creek Operations, has been instituted. The Task Force's stated objectives include:

- Upgrade and standardization of Nuclear Department procedures regarding Licensee Event Report (LER) and Incident Report (IR) preparation.
- Standardization of root cause analysis techniques.
- Enhancement of corrective action programs.
- Development of a uniform trending program for LERs and IRs for our nuclear plants.
- Formation of a Scram/Significant Event Response Team that will rapidly mobilize, following any event, for analysis and remedial recommendation formulation using techniques and program developments described above.

In addition to the above, the Task Force has:

- Sponsored a presentation of the INPO Human Performance Evaluation System (HPES) to station management.
- Evaluated HPES program applications for 1988.
- Dispatched several team members to attend the INPO course at other utility locations.

To complement the above effort, the Maintenance Manager - Hope Creek is chairing a Scram Elimination and Procedures Compliance Task Team. This team will draw on the knowledge and experience of both management and bargaining unit personnel. Additionally, station management has participated in BWR Owners Group workshops on scram reduction, root cause analysis, and LER reduction.

ATTACHMENT 1 (CONT'D)

4. LONG TERM CORRECTIVE ACTIONS:

By June 30, 1988, the following programmatic enhancements will be implemented:

- Conduct a Tagging Request Inquiry System (TRIS) audit of instrument root valves on a continuing basis as F&IDs are revised to complete our update program.
- Complete intermediate valve numbering and locking program for instrument sensing lines.
- Reanalyze the need for Q/non-Q boundary valves in those pressure indication lines that require periodic use.

An annual review will be conducted in 1988 and 1989 by the Nuclear Safety Review organization to determine the effectiveness of the above actions.

5. WE ARE NOW IN FULL COMPLIANCE.