

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

April 6, 1988
NLR-N88053

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

Gentlemen:

REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-354/88-01
DOCKET NO. 50-354
HOPE CREEK GENERATING STATION

Public Service Electric and Gas Company (PSE&G) is in receipt of your letter, dated March 7, 1988, which transmitted a Notice Violation involving a failure to comply with the requirements of Technical Specification 3/4.7.10, Liquid Radwaste Monitoring Instrumentation.

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

Sincerely,

BBO4120326 BBO406
PDR ADOCK 05000354
G PDR



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 50-354/88-01

As described in Appendix A of your March 7, 1988 letter, Technical Specification 3.3.7.10 requires that the liquid radwaste discharge line to the cooling tower blowdown line isolate if a circuit failure or instrument downscale failure occurs. Surveillance test requirement, 4.3.7.10 requires that this isolation function be tested quarterly.

Contrary to the above, on January 6, 1988, it was determined that the liquid radwaste discharge to the cooling tower blowdown line did not isolate upon a circuit failure or instrument downscale failure and that this function had not been tested quarterly.

1. PUBLIC SERVICE ELECTRIC AND GAS COMPANY DOES NOT DISPUTE THE VIOLATION.
2. THE ROOT CAUSE OF THE VIOLATION WAS PERSONNEL ERROR IN NOT VERIFYING THAT STATION FUNCTIONAL TEST PROCEDURES FOR THE LIQUID RADWASTE MONITOR MET THE SPECIFIC REQUIREMENTS OF TECHNICAL SPECIFICATIONS.

The original design logic for the liquid radwaste monitor did not include an isolation of the liquid radwaste discharge to the cooling tower blowdown line upon circuit or downscale failure. As described in the PSAR, there was only a control room alarm for these failures. However, the version of the Technical Specifications issued with the operating license requires this isolation function on a circuit failure or downscale failure. The disparity between the as-built design and technical specifications test requirements was not noticed during surveillance test procedure reviews. Consequently, neither correction by a design change or by an amendment of the technical specifications was accomplished.

3. IMMEDIATE CORRECTIVE ACTIONS:

A design change was implemented on January 13, 1988 which modified the Liquid Radwaste Discharge Monitor logic...adding the capability to automatically isolate the liquid radwaste discharge to the cooling tower blowdown line upon a downscale or circuit failure.

IMMEDIATE CORRECTIVE ACTIONS - (CONT'D)

The reviewer responsible for the error in verification of the functional testing of the liquid radwaste discharge monitor is no longer employed at Hope Creek Generating Station. Since that individual was dedicated to the review of only Radiation Monitoring System (RMS) procedures, all of the RMS procedures were re-verified to ensure that all Technical Specification requirements are addressed.

4. ACTIONS TAKEN TO PREVENT RECURRENCE:

This event was reviewed with all currently designated Station Qualified Reviewers (SQR's) emphasizing thoroughness of reviews of procedural changes against the current technical specifications and design documents. The event was also reviewed for inclusion in the SQR training program.

As described in the inspection report, previous instances of mismatch between as-built plant configuration and technical specifications were cited in Inspection Report 50-354/87-16. Since measures enacted in response to that report were not totally effective, the Nuclear Safety Review Department has now been charged with performing a complete, independent review and re-verification of the Hope Creek Generating Station Technical Specifications surveillance program... presently scheduled to be completed by June 30, 1988.

That re-verification is in progress and includes:

- ° A full, line-by-line comparison of the latest T.S. requirements with those of the Hope Creek Station surveillance matrix.
- ° A full comparison of the surveillance matrix against the Managed Maintenance Information System (MMIS) surveillance test data base and against the various logs for surveillance more frequent than once per seven days.
- ° A review of Station programs and procedures related to Technical Specification revisions and the handling of required surveillances.
- ° A technical review of a representative sample of surveillance procedures with reference to design intent, FSAR description, and T.S. surveillance requirements.

5. WE ARE IN FULL COMPLIANCE.