

Public Service  
Electric and Gas  
Company

**Steven E. Miltenberger**  
Vice President -  
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Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 339-4199

May 4, 1988  
NLR-N88066

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

Gentlemen:

REPLY TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT 50-354/88-05  
DOCKET NO. 50-354  
HOPE CREEK GENERATING STATION

Public Service Electric and Gas Company (PSE&G) is in receipt of your letter, dated April 4, 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. G. W. Meyer  
USNRC Senior Resident Inspector

Mr. D. M. Scott, Chief  
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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 50-354/88-05

As described in Appendix A of your April 4, 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-057, "Device/Equipment Calibration, Dwyer Differential Pressure Switch Series 1800 and 1900", 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-057 was improperly performed, in that, the "B" channel FRVS fan flow pressure switch 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 February 26, 1988, the 'B' Filtration, Recirculation and Filtration System (FRVS) ventilation fan flow pressure switch was not properly returned to service after completion of a surveillance test. 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 and immediate corrective actions were implemented, 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 maintenance manager personally conducted training on procedural compliance with members of the maintenance-controls organization (including contractors) with an NRC representative in attendance. The presentation was video-taped for future personnel training.

Additional specific training was conducted by maintenance-controls supervisory personnel regarding documentation and verification of valve/switch manipulations. All members of the controls group reviewed and signed a statement acknowledging both instructional sessions and their full understanding and acceptance of their responsibilities.

The station quality assurance department dedicated two inspectors to round-the-clock monitoring of the maintenance-controls group activities throughout remainder of the outage. During the six week surveillance period, no additional problems occurred or were uncovered by the QA team. The dedicated surveillance monitoring team did note increased presence and participation by maintenance-controls supervisors in field activities.

Work orders to perform lineup verification prior to startup of the unit were completed that included the four channels of RPS/NSSSS/ECCS level and pressure instruments as well as selected instrument valve lineups for the Reactor Recirc, Main Steam, Feedwater, Reactor Water Cleanup, and other containment support systems.

4. ACTIONS TAKEN TO PREVENT RECURRENCE:

The safety review organization conducted a human performance evaluation system review. The resulting recommendations and comments are being reviewed for potential programmatic improvements or corrective measures.

As described in our response to a previous Notice of Violation involving 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. This latest incident occurred too quickly after the formation of the working group for any improvements to be implemented that could have precluded further procedural compliance problems.

5. WE ARE IN FULL COMPLIANCE.