

Public Service
Electric and Gas
Company

Steven E. Miltenberger

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

Vice President and Chief Nuclear Officer

NLR-N88084
May 26, 1988

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

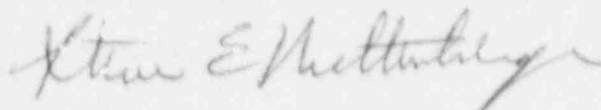
Gentlemen:

REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-354/88-03
DOCKET NO. 50-354
HOPE CREEK GENERATING STATION

Public Service Electric and Gas Company (PSE&G) is in receipt of your letter, dated April 27, 1988, which transmitted a Notice Violation involving a failure to comply with the requirements of 10 CFR 50, Appendix B, Criteria V.

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
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 50-354/88-03

As described in Appendix A of your April 27, 1988 letter, 10 CFR 50, Appendix V states, in part, that: "Activities affecting quality shall be accomplished in accordance with instructions, procedures...". Procedure number VPN-MSP-07, Section 8.2.1 states, in part, that: "The use of whiteout and/or obliteration is not permitted on Quality Assurance records. Changes shall be made by a single line drawn through the item with new information written in, initialed and dated." Contrary to the procedural requirements, on January 29, 1988, EQ files were found with whiteout changes and/or deletions of original text and the changes had not been initialed or dated. This was identified as a Severity Level V violation.

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, VPN-MSP-07.
3. IMMEDIATE CORRECTIVE ACTIONS:

A memorandum was distributed on February 4, 1988, instructing those personnel responsible for the equipment qualification program to adhere specifically to the procedural requirements of VPN-MSP-07, Section 8.2. This instruction was reinforced on February 9, 1988, during a staff meeting with the responsible group.

A sample of the EQ files was reviewed to determine the extent of the use of whiteout and/or correction tape, and any other lack of compliance with the requirements of VPN-MSP-07, Section 8.2. The results of the review indicated that only "Review Checklists", which are used by the EQ engineers in their review of Vendor Test Plans and Qualification Reports, contained non-conformances with the subject VPN procedural requirements.

ATTACHMENT 1 (CONT'D)

A four hour training class was held on April 11, 1988 to clarify to all engineers working on our Salem and Hope Creek Generating Stations' EQ files, proper preparation, review and updating techniques for EQ file binders.

4. ACTIONS TAKEN TO PREVENT RECURRENCE:

Programmatic Standard, DE-PS.ZZ-0002(Q)-A6, "Audit Binder Control", will be revised to specifically address the methods of updating documents and to reinforce the prohibition of the use of whiteout and/or correction tape on QA records.

PSE&G will restructure the Hope Creek Generating Station Equipment Qualification files. An implementation plan and schedule for this effort will be submitted to the NRC by June 30, 1988. During the implementation of this program, PSE&G will examine, particularly, methods to reinforce proper correction techniques for all EQ files.

5. WE ARE IN FULL COMPLIANCE.