

Public Service  
Electric and Gas  
Company

**Louis F. Storz**

Public Service Electric and Gas Company

P.O. Box 236, Hancocks Bridge, NJ 08038

609-339-5700

Senior Vice President - Nuclear Operations

**MAR 25 1999**

LR-N990111

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

**REPLY TO NOTICE OF VIOLATION  
EXAMINATION REPORT 354/98-302  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354**

Public Service Electric and Gas (PSE&G) provides the attached information in response to the Notice of Violation issued on February 26, 1999, in Hope Creek Examination Report 50-354/98-302.

If you have any questions concerning the above information, please contact Brian Thomas at 609-339-2022.

Sincerely,

*Louis F. Storz*

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C Mr. H. J. Miller, Administrator - Region I  
USNRC Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Richard J. Conte, Chief  
Operator Licensing and Human Performance Branch  
Division of Reactor Safety  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. R. Ennis, Licensing Project Manager -- Hope Creek  
U. S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Mail Stop 14E21  
Rockville, MD 20852

Mr. S. Pindale (X24)  
USNRC Senior Resident Inspector

Mr. K. Tosch, Manager, IV  
Bureau of Nuclear Engineering  
P.O. Box 415  
Trenton, NJ 08625





**ATTACHMENT  
REPLY TO NOTICE OF VIOLATION  
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During an NRC inspection conducted from November 24, 1998 through December 4, 1998, the following violation of NRC requirements was identified as described below:

10 CFR 55.59(a)(5)(i) requires, in part, that the facility licensee shall maintain records documenting the participation of each licensed operator and senior operator in the requalification program.

Contrary to the above, from March 1998 through November 1998, the facility licensee failed to maintain records for five operators documenting their participation in the requalification program. Specifically, the facility licensee was missing training attendance records for five operators on mandatory requalification program training classes.

This is a Severity Level IV violation (Supplement I).

**RESPONSE:**

**PSE&G concurs with the violation.**

**(1) The reason for the violation.**

The reason for the failure to maintain records for the five operators in the requalification program is attributed to the following:

- Less than adequate Training Management Oversight concerning records program implementation and resource control. Training Management did not provide proper oversight of training records processing since record transmittal was allowed to consistently extend beyond the 7-day requirement contained in the procedures. Training Management also failed to increase supervision sufficiently to preclude record retention anomalies during implementation of training records retention using new SAP database.
- Failure to submit the training records package for processing within seven business days of course completion contrary to the 'Nuclear Training Records' procedure.
- Inadequate implementation of new SAP database for training records.

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**(2) The corrective steps that have been taken.**

- A. Hope Creek Licensed Operator Training completed a full audit of the 1998 requalification training records. The Hope Creek Licensed Operator Training Staff took immediate actions to have all licensed operators make up any training for which records were missing. The outstanding records for requalification training were then reissued. This activity was completed prior to the end of the 24 month licensed operator requalification training cycle.
- B. A review of the 1998 Salem Licensed Operator requalification training records was performed and no significant problems were identified.
- C. The Operations Training Instructors qualification process has been revised to include SAP database orientation for documenting training records.
- D. The expectation that a records review will occur after each segment of operations requalification training and this review be conducted by the cognizant training supervisor has been promulgated by Operations Training Management.
- E. Appropriate personnel involved with the administration and oversight of the Hope Creek operations training records processing were held accountable for their inappropriate actions in accordance with PSE&G policies.

**(3) The corrective steps that will be taken to avoid further violations.**

- A. Training will be provided to the Operations Training Instructors and Training Management personnel involved in the processing of training records by June 1, 1999. This training will include a review of regulations governing training records, internal requirements and guidance concerning training records, and SAP computer training related to training record processing.

**(4) The date when full compliance will be achieved.**

Full compliance was achieved by December 31, 1998, when the outstanding training records for requalification training were issued. This action was completed prior to the end of the requalification training cycle.