

Public Service
Electric and Gas
Company

Corbin A. McNeill, Jr.

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge NJ 08038 609 339-4611

Vice President
Nuclear

March 21, 1986

Mr. Richard W. Starostecki
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Starostecki:

ADDITIONAL INFORMATION
ALLEGATION LETTER DATED 1/8/86
HOPE CREEK GENERATING STATION

We have reviewed our October 24, 1985 response in light of the questions conveyed in your letter dated January 8, 1986 and provide the following information accordingly. The concerns expressed have been grouped below by root cause.

1. Improper/Inadequate Test Packages (GKC-0176, GJC-0062 and GKC-0044)

The allegor was correct in stating that these test packages were inadequate or improper for performing the calibration work at hand. Given that Hope Creek has approximately 16,000 instruments installed, we realize that these problems will occur during initial calibration activities. Our startup program makes provision for handling problems of this nature.

We have evaluated your concern over the generic implications of potentially incorrect test packages. The startup program provides a multi-tiered review process for all I&C test packages which precludes successful completion of a test utilizing an improper documentation package. It is apparent that the allegor did not understand the review process and the control that the process provides. Each package is reviewed by the I&C Technician, his Supervisor, the responsible Startup Test Engineer (STE), the STE's Group Lead, a Level III reviewer, the Startup Administrative Group and QA, as appropriate. This review process is very thorough and effective in identifying the use of improper/inadequate test packages.

8709290354 870924
PDR FOIA
MAXWELL87-413 PDR

B-9

Similar concerns regarding the adequacy of the Hope Creek startup program were addressed in a third party review conducted from January 27 to February 7, 1986. The review was performed by Power Management Associates of Niantic, Connecticut. Their report concluded that our startup program has demonstrated very strong control of test exceptions and changes despite the number of SDR's written.

2. Lack of Information (AFC-0027, GSC-0194, OHB FT-N120 and Westinghouse Controllers)

All of these concerns were either being addressed by Startup Deviation Reports (SDR's) already issued (e.g., AF-0088 and 0094) or were subsequently resolved through the startup test exception process by the dayshift personnel. Again, it appears that the allegor did not understand the startup program provisions for resolution of problems.

The generic implication aspect of these concerns was addressed to our satisfaction in Section 1.A of the Safeteam Report which states, in part:

The Safeteam interviewed sixteen (16) Instrumentation & Controls (I&C) Technicians from PSE&G and the sub-contractor. All have had similar problems on test packages concerning procedures and calibration requirements. All Technicians interviewed said these types of problems can be identified on the exception list in each test package or be taken to the responsible Startup Test Engineer (STE) to be corrected.

3. Misread/Misapplied Requirements (Blowdown Valves, Compression Fittings and Motor Control Centers)

The allegor was in error regarding compliance to requirements beyond his limited scope of responsibility. In the case of the blowdown valves, the requirement was misstated and the instrument vents were identified incorrectly as blowdown valves.

The compression fittings requirement was similarly misapplied. There is no Class I instrument tubing in the Hope Creek plant. Substitution of flared fittings in Class 2 and 3 instrument lines has been approved by PSE&G Engineering.

Regarding the motor control center clearance requirements, the allegor cited a standard that does not apply to nuclear power plants. However, Design Change Package No. 615 has been generated to provide additional room to facilitate maintenance activities. This is in accordance with IEEE Standard 141 and constitutes good engineering practice. The installed conditions do not violate the intent of applicable safety codes and are acceptable to PSE&G Engineering.

There are no potential generic implications regarding these three concerns.

In general, root cause and generic implication questions are addressed by the PSE&G Steering Committee that performs a utility oversight function for all Safeteam concerns. As required, questions and requests for additional information are directed to cognizant onsite organizations prior to final response to the concerne.

Sincerely,



C NRC Resident Inspector - Hope Creek
P.O. Box 241
Hancocks Bridge, NJ 08038

ALLEGATION MANAGEMENT SYSTEM

ALLEGATION NUMBER - R111-B6-A-0060

RUN DATE: 860402

DOCKET/FACILITY/UNIT: 05000461 / CLINTON 1

DOCKET/FACILITY/UNIT: /

DOCKET/FACILITY/UNIT: /

DOCKET/FACILITY/UNIT: /

/ 1
/
/
/
/

ACTIVITY TYPES - REACTOR

MATERIAL LICENCES -

FUNCTIONAL AREAS - CONSTRUCTION

DESCRIPTION - NRC REVIEW OF THE ILLINOIS POWER COMPANY'S SYSTEM FOR
PROCESSING ALLEGATIONS RECEIVED BY THE LICENSEE AT THE
CLINTON POWER STATION, SAFETEAM.

CONCERNS -

1

SOURCE - NRC REGION 111

CONFIDENT - NO

RECEIVED - 860402 BY - CH WEIL

/ R3

ACTION OFFICE CONTACT - CH WEIL

- (FTS) 388-5535

SAFETY SIGNIFICANCE - NO

BOARD NOTIFICATION - NO

STATUS - CLOSED SCHED COMPLETION -

DATE CLOSED - 860402

ALLEGATION SUBSTANTIATED - NO

ALLEGER NOTIFIED - NO

OI ACTION - NO

OI REPORT NUMBER -

REMARKS - THE REGION 3 REVIEW OF THE CLINTON "SAFETEAM" WAS
DOCUMENTED IN INSPECTION REPORT NO. 50-461/86004.

ENTERED SYSTEM - 860402 CLOSED SYSTEM - 860402 RECORD CHANGED - 860402

B-10
SECRET
J468

B. ACTION OFFICE									
*1 ALLEGATION NUMBER		*2 CONTACT (first two initials, last name)		*3 CONTACT'S TELEPHONE		*4 SAFETY SIGNIFICANCE		5 BOARD NOTIFICATION RECOMMENDED	
YEAR	DATE	YEAR	MONTH	DAY	AREA CODE	NUMBER	a YES	b NO	a YES
86	1-11-00	86	11	00	FTS	381-5535	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
*6 STATUS		*7 ALLEGATION WAS SUBSTANTIATED		*8 ALLEGER NOTIFIED OF CLOSURE		a YES		b NO	a YES
a OPEN	DATE COMPLETION SCHEDULED	a b	DATE CLOSED	a b	a YES	b NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
REMARKS (800 characters, use additional page if necessary)									
See Inspection Report No. 50-46186004 (DRP).									
10 OI ACTION		a YES		b NO		11 OI REPORT NUMBER			
<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>					
* REQUIRED ENTRIES									
* REQUIRED IF STATUS IS CLOSED									