Richard A. Uderitz
Vice President -
Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 935-6010

March 17, 1983

Mr. Ronald C. Haynes, Regional Administrator
U.S. Nuclear Regulatory Commission - Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki
Division of Project and Resident Programs

Gentlemen:

NRC COMBINED INSPECTION 50-272/82-36, 50-311/82-33
SALEM GENERATING STATION
UNITS NO. 1 AND 2
DECEMBER 22, 1982 THRU JANUARY 25, 1983

The following is our response to the item of violation identified during the subject inspection.

ITEM OF VIOLATION

Item A

Unit 1 Environmental Technical Specification 2.3.4b requires that gaseous releases to the environment...shall be continuously monitored for gross radioactivity. Whenever these monitors are inoperable, grab samples shall be taken and analyzed daily for gross radioactivity.

Contrary to the above:

> During the period December 25, 1982 to January 4, 1983, gaseous releases to the environment from the Unit 1 plant vent were not continuously monitored for gross radioactivity and daily grab samples of plant vent releases were not taken and analyzed.

Reply to Item A

The cause was identified by the NRC as: "The procedures for the Control Room personnel did not adequately address the need for establishing a daily grab sample when the monitor was inoperable."

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Reply to Item A (continued)

In order to clarify the requirement, Operations Directive-12, Technical Specification Interpretations, has been expanded to include Interpretation Guide-11 (attached), which states that when the R16 monitors are inoperable, the R41C monitors may be used as backup. It also requires that if both the R16 and R41C monitors are inoperable then the Chemistry Engineer must be notified that plant vent grab samples are required to be taken and analyzed daily for gross radioactivity.

The Control Room Logs for both Unit 1 and Unit 2 have also been revised to provide the requirements to notify the Chemistry Department to take grab samples when the RMS channels are inoperable. Additionally, footnotes were added to the logs to provide reference to the requirements in Interpretation Guide-11.

The licensed operators were notified of the procedure and log changes concerning this violation through the issuance of Information Directive Notice 83-18.

Sincerely,

R. G. Zeller

Attachment

CC: Director, Office of Inspection and Enforcement
Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Leif J. Norrholm
NRC Senior Resident Inspector

INTERPRETATION GUIDE - 11

PLANT VENT RMS OPERABILITY
ENVIRONMENTAL TECHNICAL SPECIFICATION 2.3.4 Table 2.3-4
UNITS 1&2

INTERPRETATION:

A. Environmental Technical Specification 2.3.4 states that gaseous releases to the environment through the plant vent must be continuously monitored. This monitoring is normally performed by R16. If R16 is inoperable, R41C can be used for a backup. If both R16 and R41C are inoperable, the Chemistry Engineer must be notified in order to have a daily grab sample taken of the plant vent on the affected Unit.

When a release is made from the gas holdup system, the R41A, R41B, and R41C monitors must be in operation. If any of these monitors are inoperable, a release shall not be made.

BASIS:

Not Required.