



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038

Nuclear Department

November 21, 1983

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Martin:

NRC COMBINED INSPECTION 50-272/83-22 AND 50-311/83-22
SALEM GENERATING STATION
NO. 1 AND 2 UNITS
DOCKET NOS. 50-272 AND 50-311

The subject inspection report identified several violations and one deviation related to the Salem Generating Station Radiation Protection and Health Physics programs. PSE&G's responses to the violations and one deviation are provided below.

NOTICE OF VIOLATION

Item A

Technical Specification 6.4 requires, in part, that a retraining and replacement training program for the facility staff shall be under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971. Section 5.5 of ANSI N18.1-1971 requires that a training program be established to maintain the proficiency of the operating organization through periodic training exercises, instruction periods and reviews covering those items which relate to safety operation of the facility and recommends that means be provided for appropriate evaluation of its effectiveness. Section 5.5.1 of ANSI N18.1-1971 recommends that changes in operating procedures be included in the retraining program.

Contrary to the above:

As of July 29, 1983, the In-Plant Radiation Protection Technician retraining and replacement training program was not under the direction of the Training Manager. In addition, the established retraining program for Radiation Protection Technicians was inadequate to maintain the proficiency of the operating organization in that no method was in-place to

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assure that technicians had been trained in procedure changes and new procedures before the technicians carried out tasks involving the changes or new procedures.

Reply to Item A

The violation involves two aspects of training: 1) in-plant training not being under the direction of the training manager and 2) lack of an effective method to ensure familiarization with procedure changes. The lack of direction from the training manager occurred due to oversight during the transfer of responsibility for training to the Manager - Nuclear Training and the establishment of the Nuclear Training Center. The inadequacy of the retraining program was due to oversight in developing a procedure for distribution and review of significant procedure changes.

a. Corrective steps which have been taken and results achieved

1. A training program was instituted on September 12, 1983 and completed on November 4, 1983 under the direction of the Manager - Nuclear Training. This training will be given on an annual basis.
2. Radiation Protection Department training records have been transferred to the Manager - Nuclear Training.
3. Training sessions were held to familiarize personnel with past procedural changes and were completed on September 30, 1983.
4. The Nuclear Training Center staff has developed and implemented a procedure entitled "Radiation Protection Contractor Acceptance and Procedure Update" (Training Procedure No. 404). Additionally, the Nuclear Training Department initiated an "Instructor Development Program" in September of 1982.

b. Corrective steps which will be taken to avoid further violations

1. The in-plant training instructor will report to the Manager - Nuclear Training as opposed to the Radiation Protection Engineer.
2. A 60-day limit on due dates for significant procedural change familiarization will be implemented.

3. The Radiation Protection Instruction familiarization record will be modified to create one familiarization record for each procedure for each appropriate category of personnel. Prior to a shift implementing a procedure that has been significantly changed, they will be made familiar with the change by either attaching a familiarization record to the shift turnover log or through formal briefing by the supervisor.

c. Date when full compliance will be achieved

We will be in compliance by February 1, 1984.

Item B.1

Technical Specification 6.11 requires that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Radiation Protection Procedure RP 1.009, Revision 2, requires in Section J that quantitative sampling of the breathing air system be performed every 48 hours while the system is in continuous operation or prior to its use if it has not been sampled within the previous 24 hour period.

Contrary to the above:

The breathing air system was used extensively during the period February 11, 1983 through April 13, 1983 to support Unit 2 Steam Generator work, however, no sampling of the breathing air system was performed during the period.

Reply to Item B.1

During outages and other periods when breathing air is employed for radiation protection purposes, breathing air is sampled at least every 48 hours during its use. With regard to the period between February 11, 1983 through April 13, 1983, the personnel responsible for sampling of the breathing air were interviewed to determine the circumstances surrounding the incident. The personnel involved recalled that the breathing air was sampled in accordance with established procedures at the correct time interval; however the documentation to substantiate these actions has been lost. During the period in question, the responsibility for sampling the breathing air was temporarily

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assigned to personnel who were not normally involved with the procedures and resulted in inadequate control of the documentation log.

a. Corrective steps which have been taken and results achieved

On August 15, 1983, the responsibility for strict control of breathing air sampling and analysis documentation was returned to the Technical Supervisor in charge of instruments and equipment.

b. Corrective steps which will be taken to avoid further violations

Radiation Protection Procedure RP 6.020 has been revised to clarify the documentation and records requirements in this area. The reassignment of responsibility for documentation of the procedure and instruction to all personnel on the importance of strict control of the documentation log should prevent recurrence of this problem.

c. Date when full compliance will be achieved

We are now in full compliance.

Item B.2

Radiation Protection Procedure No. RP 1.009, Revision 2, requires in Section F that the Respirator Protection Program records section maintain copies of respiratory protective equipment procurement information.

Contrary to the above:

As of July 29, 1983, the Respirator Protection Program records section was not maintaining copies of respiratory protective equipment procurement information.

Reply to Item B.2

a. Corrective steps which have been taken and results achieved

The referenced procedure has been changed to eliminate this unnecessary requirement.

b. Corrective steps which will be taken to avoid further violations

Same response as answer (a) above.

c. Date when full compliance will be achieved

We are now in full compliance.

Item B.3

Radiation Protection Procedure No. RP 1.009, Revision 2, requires in Section I.1, that the DEL-MONOX breathing air purification system be maintained in accordance with the manufacturer's recommended maintenance instruction. The instruction requires that the filters be changed annually.

Contrary to the above:

As of July 29, 1983, DEL-MONOX breathing air purification systems were not being maintained in accordance with the manufacturer's recommended maintenance instruction. Filters on 5 DEL-MONOX Units in USC had not been changed in at least 18 months.

Reply to Item B.3

The lack of required maintenance of the DEL-MONOX units was due to inadequate procedural control.

a. Corrective steps which have been taken and results achieved

The breathing air purification units in question were tagged out of service. The replacement filters for these units are on order. Since the inspection, the only breathing air purification unit employed has been maintained in accordance with the manufacturer's instruction.

The maintenance requirements for these DEL-MONOX units have been placed in the Station Inspection Order System. Radiation Protection Procedure RP 8.044 has been revised to indicate the tagging requirements for equipment which cannot be maintained in accordance with procedures.

b. Corrective steps which will be taken to avoid further violations

Once new filters received, the tagged out units will be placed back in service.

c. Date when full compliance will be achieved

We are now in full compliance.

Item B.4

Radiation Protection Procedure No. RP 6.009, Revision 4, requires in Section B that when a respirator is issued, the individual receiving the mask shall be responsible for its return. Section C states nasal smears shall normally be taken by respirator users and counted before an individual is released from the controlled area.

Contrary to the above:

During the period July 20-27, 1983 about 10 individuals were issued respirators who did not return them nor take nasal smears prior to their leaving the controlled area.

Reply to Item B.4

This item of noncompliance was the result of failure of personnel to follow established procedures.

a. Corrective steps which have been taken and results achieved

Notices were placed in the TLD slots of the individuals involved. When these individuals picked up their TLDs, they were instructed in their responsibilities under the procedure. The individuals were informed that their TLDs would be removed from the area if correct procedures were not followed and their supervisors would be contacted for appropriate action.

b. Corrective steps which will be taken to avoid further violations

A tracking system will be developed to identify repeat offenders. Repeated noncompliance with procedures by individuals will be brought to the attention of both the individual's supervisor and plant management. Appropriate disciplinary action will be taken.

c. Date when full compliance will be achieved

We will be in full compliance by January 1, 1984.

Item B.5

Radiation Protection Procedures No. RP 1.013, Revision 8, requires in Section C, that all entries into the controlled

access area be made in accordance with the governing Radiation Exposure Permit (REP) or Extended Radiation Exposure Permit (EREP). EREP No. 9917 (Unit 1 and 2), dated July 1, 1983, requires, as a minimum for entry into contaminated areas, that cloth cap, plastic shoe covers, cotton liners, and a lab coat be worn as protective clothing.

Contrary to the above:

On July 26, 1983 an individual was found inside the Boric Acid Transfer Pump Alley (a contamination area) without a lab coat.

Reply to Item B.5

This item of noncompliance was the result of failure of personnel to follow established procedures and instructions.

a. Corrective steps which have been taken and results achieved

A Lapse of Radiological Control (LRC) report was filled out on the referenced individuals.

b. Corrective steps which will be taken to avoid further violations

A tracking system will be developed to identify repeat offenders to plant management for appropriate disciplinary action.

c. Date when full compliance will be achieved

We will be in full compliance by January 1, 1984.

Item C

10 CFR 50, Appendix B states in Criterion 5 that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions and that the instructions shall include appropriate quantitative or qualitative acceptance criteria for determining that the important activity has been satisfactorily accomplished. Quality Assurance Instruction (QAI) No. 4-3, Revision 10, states in Section 4.1.6 that contracts for safety related items or services or non-safety related with QA provision, be reviewed by the QA Services Division prior to execution and that purchase orders for contracts for the services be classified as safety related and appropriate Quality Assurance provisions applied. Section 4.1.6.1 states that examples of such services are radiation monitoring/protection.

Contrary to the above:

Purchase orders issued (to the Dive Shop of New Jersey) on October 5, 1982 and January 20 and May 18, 1983 involving the determination of breathing air quality, a radiation protection service, were neither classified as safety related nor were appropriate Quality Assurance provisions offered.

Reply to Item C

a. Corrective steps which have been taken and results achieved

Effective September 5, 1983, Nuclear Department Procurement Control Procedure VPN-PP-1 was issued for implementation by all organizations involved in the procurement process. The procedure was reviewed and approved by the Manager - Nuclear Operations Quality Assurance prior to issuance to ensure that the appropriate elements of the QA program were addressed. VPN-PP-1 represents a departure in previous practices with respect to station initiated procurements in that item classification (safety-related, non safety-related, CCI, etc.) is now the primary responsibility of the originating department utilizing the Salem Master Equipment List (MEL) in the determination. If the item cannot be classified utilizing the MEL criteria, it is referred to Nuclear Engineering for assignment of procurement item classification including the need for QA provisions, which are subsequently established by Nuclear Operations QA. Procurements involving station services which do not appear on the MEL are referred to Nuclear Operations QA for coordination of procurement classification with Nuclear Engineering and assignment of appropriate QA provisions.

b. Corrective steps which will be taken to avoid further violations

Via agreement with the Health Physics Department, all future procurements for radiation monitoring/protection services will contain a health physics recommendation for assignment of procurement item classification.

Suppliers of safety-related station services or those station services for which QA procurement requirements have been imposed will be subject to qualification by Nuclear Operations QA. This activity is in process for the Dive Shop of New Jersey and will be completed by December 15, 1983.

In addition to the above, all station initiated procurements are currently subject to Nuclear Operations Quality

Assurance verification in accordance with our interim procedure QAP 3-1.1 except for those items/services specifically authorized for exclusion on the VPN-PP-1 QA exceptions list.

c. Date when full compliance will be achieved

We will be in full compliance by December 15, 1983.

Item D

10 CFR 19.11 requires that copies of any notice of violation involving radiological working conditions and any response thereto be posted within two working days of receipt of the notice or dispatch of the response, whichever is applicable. This section also requires that these documents be posted in a sufficient number of places to allow workers to observe them on the way to or from licensed activity locations.

Contrary to the above:

As of July 18, 1983 two notices of violations dated May 6 and June 28, 1983 and a licensee July 1983 response to the former notice were not posted in a sufficient number of places to allow workers to observe them on the way to or from licensed activity locations. The documents were not posted at the contractor Health Physics Control Point or the Main Health Physics Control Point. These control points are the primary access to licensed activity locations.

Reply to Item D

The posting of regulatory materials is addressed in Administrative Procedure AP-16, Posting of Regulatory Materials. The failure to post the referenced violations at the control points resulted from a change to the Administrative Procedure which required the posting at the Contractor and Public Service Electric and Gas guard gates. The intent of the posting at the guard gates was to ensure that all personnel entering the site be able to see the violations and the responses. The statement in 10 CFR 19.11(d) was interpreted to mean posting at entrance to site vice entrance to restricted area per paragraph 11(c).

a. Corrective steps which have been taken and results achieved

Copies of the subject violations/responses were posted at the control points immediately after being identified by the inspector.

b. Corrective steps which will be taken to avoid further violations

The Administrative Procedure (AP-16) has been revised to require posting of violations which concern radiological working conditions and PSE&G responses to these violations in accordance with 10 CFR 19.11(a) at the two control points.

Responsibility for the posting of these matters has been transferred to the Technical Manager.

c. Date when full compliance will be achieved

We are now in full compliance.

APPENDIX B

NOTICE OF DEVIATION

In your letter to the Commission dated September 25, 1979, in response to IE Bulletin No. 79-19, you stated that: "... a supplemental program for training and retraining in DOT and NRC regulations, waste burial requirements, and procedures and instructions for those personnel involved with transfer, packaging, and transport of radioactive material will be developed by January 1, 1980 and implemented by April 1, 1980."

Contrary to the above:

A supplemental program for training personnel in DOT and NRC regulations, waste burial requirements, and procedures and instructions for those personnel involved with the transfer, packaging, and transport of radioactive material was not established and implemented until April 1981. In addition, as of July 1983 no supplemental retraining program in these areas has been established.

Reply to Deviation

The Radiation Protection Department assumed responsibility for this task from the Maintenance Department in 1980 and conducted initial training on the referenced subjects on January 17 and 18, 1980 in accordance with the commitment made in response to IE Bulletin 79-19.

Due to the fact that personnel are not normally assigned to these duties on a long-term basis, the commitment to provide retraining to these personnel was overlooked.

The Radiation Protection Department has continued to provide training to personnel as they were assigned to the duties of transfer, packaging and shipping of radioactive waste.

a. Corrective steps which have been taken and results achieved

Supervisory personnel in charge of this area received retraining in September 1982 through attendance at a training class sponsored by Chem Nuclear Systems Incorporated of Columbia, S.C. A recent NRC inspection (83-20) indicated no violations in this area.

b. Corrective steps which will be taken to avoid further violations

The Radiation Protection Department Rad Waste Training Program will be placed under the control of the Manager - Nuclear Training. The continuing training program will also be revised to include retraining of appropriate personnel involved with the transfer, packaging and transport of radioactive material.

c. Date when full compliance will be achieved

We will be in full compliance by February 1, 1984.

ADDITIONAL AREAS OF CONCERN

The inspector also identified additional areas of concern; our response is provided below.

Improvements in area of high radiation area control

Radiation Protection Department Procedure RP 1.016 has been revised to include the following improvements:

1. Controls have been specified for use of the Master Keys.
2. Specific guidance for transfer and return of high radiation area keys is now provided.
3. Clarification and guidance has been provided for issue of keys to non Radiation Protection Department personnel.

Mr. Thomas T. Martin, Director
U.S. Nuclear Regulatory Commission

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An On-The-Spot change has been issued to provide controls for chains and locks and provide instruction in their uses.

Sincerely,



E. A. Liden
Manager - Nuclear
Licensing and Regulation

CC: Mr. Donald C. Fischer
Licensing Project Manager

Mr. James Linville
Senior Resident Inspector