



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

Nuclear Department

December 9, 1983

U. S. Nuclear Regulatory Commission - Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

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

Gentlemen:

NRC COMBINED INSPECTION 50-272/83-15, 50-311/83-12
SALEM GENERATING STATION
UNITS NO. 1 AND 2
SEPTEMBER 28 THROUGH OCTOBER 6, 1983

As a result of the inspection conducted on September 28 - October 6, 1983 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 9, 1982 (47 FR 9987), the following violation was identified:

ITEM OF VIOLATION:

- A. Technical Specification 6.8.1 and Regulatory Guide 1.33, Revision 2, November 1978, require written procedures for control of maintenance on safety-related equipment. Administrative Procedure 9, "Control of Station Maintenance", Section 9.3, requires conducting post maintenance retesting on all safety-related systems in accordance with the Technical Specifications Surveillance Procedures to determine system operability whenever a system is to be returned to service following maintenance. Section 8.4 of AP-9 requires the Senior Shift Supervisor/Shift Supervisor to ensure all retest requirements have been completed satisfactorily.

Contrary to the above, as of August 30, 1983, the shift supervisor had not signed the retest completed block on the work order form and no retest had been performed following maintenance completed on valve 22SJ156 on July 16, 1983 under work order No. 931747. This valve had been considered operable to support plant operation at power during periods between July 27 and August 30, 1983.

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REPLY TO ITEM OF VIOLATION:

The No. 22 Hot Leg Safety Injection check valve, 22SJ156, developed a valve body to bonnet leak on a previous occasion. A temporary furmanited repair was made to the valve and the leak was stopped. The temporary furmanited repair started leaking and work order MD-931747 was issued on July 12, 1983 for the permanent repair of the leak. The permanent repair of the valve was done in accordance with the disposition of the deficiency report that was issued when the check valve was originally furmanited.

The deficiency report and work order required that the furmanite clamp be removed and the furmanited areas be cleaned and permanent repairs be made to the valve to stop the valve body to bonnet leak.

The work order was processed and classified as safety related and required retest criteria be designated in accordance with established Station procedures. Maintenance Planning processed the work order and specified that retest was required as per SP(0) 4.0.5 and Maintenance Procedure M17C.

The repair to the valve was completed on July 16, 1983 as follows: the furmanite clamp was removed, the furmanited areas were cleaned-up, the four valve studs were removed and replaced, a new gasket was installed and the valve bonnet was reinstalled and tightened down. No internal repairs were performed on the valve and procedures M17C and M14A were utilized during the repair. These procedures required an internal inspection for material present in the valve body that could interfere with the operability of the valve.

On July 16, 1983, the work order was turned over to the Operations Department for retest. The retest requirements listed on the work order referenced a generic set of Surveillance Procedures, SP(0) 4.0.5, as the retest procedure. This group of procedures contains no specific test criteria for 22SJ156. The Technical Specification which contains the test criteria for the valve is 4.4.7.2.c. The procedure which addresses this Technical Specification is SP(0) 4.4.7.2.1. Since no specific retest procedure was specified for the valve on the work order, no retest was completed. The work order was returned to the Maintenance Department for normal document close-out and was not returned to the Operations Department until August 31, 1983.

On August 31, 1983, the open work order was again reviewed by the same individual, and based on the fact that no specific retest procedure was specified for the valve on the work order, other than SP(0) 4.0.5 which had previously been determined not to be applicable, the retest requirements were signed off as not applicable.

An investigation into the event was conducted to determine the specific cause of the event. The investigation revealed that the retest specified by Maintenance Procedure A-21 was incorrect in that it did not indicate that leakage testing was required in accordance with Technical Specification 4.4.7.2.1.c. This requirement was also missed by the shift supervision.

ACTION TAKEN TO CORRECT AND RESULTS ACHIEVED:

Upon notification by the NRC inspectors that the valve had not been retested as required by Technical Specification 4.4.7.2.c the valve was leak rate tested and was found to be satisfactory. A review of Maintenance Procedure A-21 was performed to ensure that valve retest requirements are performed in accordance with the appropriate Technical Specifications. A revised A-21 was issued on November 2, 1983.

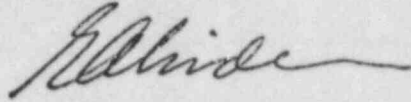
ACTION THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

The Integrated Operating Procedure will be revised by January 31, 1984 to include a specific procedural step to require the Senior Shift Supervisor/Shift Supervisor to verify all completed work orders that have been turned over to Operations for post maintenance testing prior to mode change. These work orders shall be evaluated to ensure no retest requirements are outstanding which would affect systems, equipment, or components that are required to be operable for the next intended operational mode.

A continuing effort to improve the Post Maintenance Test/Retest Program at the station is in progress; this endeavor includes the evaluations being performed in accordance with PSE&G Action 2.4.3. These improvements are aimed at increasing the reliability of the information available to those personnel who are designing the Test/Retest requirements, providing a means for Nuclear Engineering evaluation and interaction, and to provide a more uniform listing of the requirements between station departments.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

We are now in full compliance regarding the post-maintenance retesting of valve 22SJ156.



E. A. Liden
Manager - Nuclear
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