



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

Nuclear Department

August 26, 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 50-272/83-16, 50-311/83-15, 50-311/83-18  
SALEM GENERATING STATION  
NO. 1 AND 2 UNITS  
MAY 9-18, 1983 AND MAY 11 THRU JUNE 8, 1983

The following is our response to the notice of violation identified as a result of the inspection conducted during May 9-18, 1983 and May 11 thru June 8, 1983. This response has been delayed as discussed with your Mr. R. J. Summers, Resident Inspector, in the interest of providing a clear and complete response.

ITEMS OF VIOLATION

Item A

Technical specification 6.8.1, Regulatory Guide 1.33 (November 1972), and Administrative Procedure 5, "Operating Practices Program" require that all operations conducted by the Operating Department be performed in accordance with approved procedures.

Contrary to the above:

On April 16, 1983, Operating Instruction III-10.3.1, Auxiliary Feedwater System Operation, an approved procedure, was not completed in that the specified check-off sheet was not used to align the system for operation and the valve position listing actually used was incomplete.

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Reply to Item A

Background: A design change to the Auxiliary Feedwater System added two valves to the system. Upon completion of the installation, Operating Procedure OP-III-10.3.1, "Auxiliary Feedwater System Operation," was revised to include the valves

on the valve alignment checkoff sheet and the valves were also added to the data base of the Tagging Request Inquiry System (TRIS).

Among its functions, the TRIS is used to generate a computer printout of the valve alignments associated with each system operation procedure. The procedure number and required valve positions are included in each printout so as to make it functionally identical to the corresponding procedure checkoff sheet. Since the TRIS computer printout is normally the same as the procedure checkoff for any system, the printouts have been successfully used for system alignments.

Due to an oversight, the two valves were not added to the TRIS computer printout for the Auxiliary Feedwater System and, consequently, were not verified in their correct position prior to unit startup. However, on January 20, 1983, construction tagouts were released on the valves and, using a TRIS-generated tagging release worksheet, the tags were removed from the valves and their position was verified to be in the closed position as required by both TRIS and Operating Procedure OP-III-10.3.1.

Corrective actions taken and results achieved: When the omission was noted, the valves were immediately added to the TRIS printout and they were verified to be in their required position.

Corrective actions to avoid further violations: A computerized subroutine was developed that verifies that all components in the TRIS data base are assigned to a system alignment position verification worksheet. This subroutine is run regularly to assure that no further omissions occur. *sk*

We are now in full compliance on this matter.

#### Item B

Technical Specification 4.0.2 requires that each Surveillance Requirement shall be performed within the specified time interval with a maximum extension not to exceed 25%. Technical Specification 4.7.6.1d.3 requires a positive pressure test of the control room emergency air conditioning system be conducted at 18 month time intervals.

Contrary to the above:

As of June 1, 1983, the surveillance requirement of Technical Specification 4.7.6.1d.3 had not been performed since October 9, 1979, in excess of the 18 months plus 25%.

Reply to Item B

Background: The Salem Unit 2 specification 4.7.6.1d.3 requires that the system maintain 1/4 inch W.G. positive pressure in the Control Room during operation in the mixed air mode. The present Salem Unit 1 and Unit 2 Emergency Air Conditioning Systems (EACS) and the Control Room enclosures as designed cannot meet this surveillance requirement.

Test connections and equipment for conducting surveillance tests that satisfy the requirement of Technical Specification (TS) 4.7.6.1d.3 have never been permanently installed on either Salem unit. Contrary to the statement made in the Notice of Violation that "... the surveillance requirement of Technical Specification 4.7.6.1d.3 had not been performed since October 9, 1979, ...", the specification for testing the Control Room Emergency Air Conditioning System was not satisfied by the preoperational testing completed in October 1979. That specification was not a requirement until the Low Power Testing License and TSs were issued in April, 1980. Draft TS's available in October, 1979 which specified 1/4 inch W.G. for the Control Room Emergency Air Conditioning System were identified as exceeding the design capabilities of the system and efforts had been initiated to eliminate the requirement in August 1979.

Believing that T.S. requirement 4.7.6.1d.3 was not applicable to the Salem design and anticipating the deletion of the surveillance requirement via a license change request, the plant staff did not insert the 18 month requirement into the surveillance scheduling system. Due to an oversight, the T.S. amendment was never submitted to delete the requirement.

Corrective actions taken and results achieved: On June 7, 1983, when it was determined that the surveillance requirement was overdue, a special test design change was developed and the test satisfying the T.S. requirements was successfully completed. Acceptance criteria were met, with some difficulty, by maintaining fire door No. 420 closed and taking other supportive actions, all of which emphasized the fact that the Control Room EACS was not designed to meet the 1/4 inch W.G. positive pressure requirement. A positive pressure of 1/8 inch W.G. relative to outside atmosphere is more realistically achievable, and still adequately satisfies the intent of the present T.S. surveillance requirement.

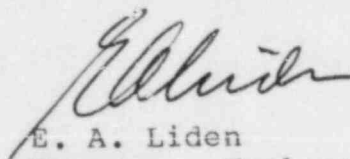
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Corrective actions to avoid further violations: The surveillance requirement was added to the Inspection Order System. A license Change Request has been initiated to reduce the Control Room pressure criteria from 1/4 inch W.G. to 1/8 inch W.G. Also, a Design Change Request has been prepared to install permanent instrumentation for performing the required surveillance.

Additionally, the Public Service Electric and Gas Action Plan addresses the area of Compliance Monitoring. This comprehensive effort will include improved compliance with all requirements, both Technical Specifications and Procedural.

We are now in full compliance.

Sincerely,



E. A. Liden  
Manager - Nuclear Licensing  
and Regulation

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

Mr. Donald C. Fischer  
Licensing Project Manager

Mr. Leif Norrholm  
Senior Resident Inspector

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