



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038-0236

Nuclear Business Unit

AUG 14 1995

LR-N95129

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

REPLY TO A NOTICE OF VIOLATION
FALSIFICATION OF EDUCATIONAL RECORDS
OFFICE OF INVESTIGATIONS REPORT NO. 1-94-016
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354

A notice of violation (OV) was issued to PSE&G in a letter dated June 30, 1995. The transmittal letter stated the following:

"The NRC has determined that information regarding the reason for the violation and the actions taken and planned to correct the violation and prevent recurrence is addressed already on the docket in Hope Creek Generating Station LER 94-002-00, dated April 14, 1994. Therefore, you are not required to respond to this letter unless the description of your corrective actions in the LER does not reflect your actions or your position accurately"

The description of our corrective actions in the LER does reflect our actions and position accurately; however, we have chosen to respond by providing a clarification of our corrective actions and an update on their status. The updated information is provided in the attachment to this letter.

Should you have any questions or comments on this transmittal, do not hesitate to contact us.

Sincerely,

L. F. Storz
Senior Vice President -
Nuclear Operations

Attachment

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The power is in your hands.

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ATTACHMENT

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I. INTRODUCTION

A notice of violation (NOV) has been issued for the incident involving a senior reactor operator who served in the role of a shift technical advisor without meeting the requirements (bachelor's degree or professional engineer's license) for the position. This resulted because the SRO had falsified his educational records by stating that he held a degree when in fact he did not.

PSE&G has previously submitted information regarding the reason for the violation and the actions taken and planned to correct the violation and prevent recurrence in Hope Creek Generating Station LER 94-002-00, dated April 14, 1994. These corrective actions included the following:

1. The subject individual's employment at PSE&G has been terminated.
2. A review of the educational qualifications of all individuals currently performing STA duties at Hope Creek Generating Station has been completed. This review verified that these individuals meet the educational requirements for an STA.
3. The present application and hiring process now requires that transcripts be provided directly from the educational institution for all employees who claim to have degrees.
4. An independent investigation by personnel other than Hope Creek Management is being conducted into this event. The results will be used to assess and strengthen our current employee qualification process.

II. CLARIFICATION AND STATUS OF CORRECTIVE ACTIONS

This attachment provides clarification of one corrective action and an update on the status of all of the corrective actions identified in the LER. The clarifying and updated information is

provided below.

Corrective Action 1: No change.

Corrective Action 2: The letter which transmitted the NOV stated that we had verified "that all individuals performing STA duties at Hope Creek and Salem met the educational requirements (by requiring all transcripts be provided directly from the educational institution for all employees who claim to have degrees)." In our letter (NLR-N94124) dated July 25, 1995, we stated that "a 100% review and verification was initiated for all licensed operators and STAs at both Hope Creek and Salem"; however, the method by which the review and verification was completed did not necessarily involve obtaining transcripts from the educational institution; in some cases, the verification was based upon discussions with the educational institution. The existing process requires obtaining transcripts directly from the educational institution, but this requirement was not retroactively applied to individuals hired before implementation of the new process.

Corrective Action 3: No change.

Corrective Action 4: An independent investigation was completed by the QA organization which resulted in various recommendations to strengthen the employee qualification process.

During recent activities to review the status of the corrective actions, it was determined that the recommendations of the QA investigation had not been adequately dispositioned and addressed. As a result, the Human Resources (HR) Department completed procedural changes to strengthen the employee qualification process. In addition, the HR department will ensure that the remaining QA recommendations are addressed and will conduct a self assessment to evaluate the effectiveness of implementation of the recommendations during the first quarter of 1996.