



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

Nuclear Department

November 19, 1984

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

Attention: Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs

Gentlemen:

COMBINED INSPECTION 50-272/84-34 AND 50-311/84-34
SALEM GENERATING STATION
UNITS NO. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

The referenced inspection, conducted on September 17-21, 1984, identified two violations, one involving the failure to follow a procedure regarding field changes to ventilation system test procedures and one involving the failure to follow training program procedures for requalifying a chemistry technician. The following is Public Service Electric and Gas's response to the Notice of Violation:

NOTICE OF VIOLATION

Item A

Section 6.5.1.6 of the Unit 1 and 2 Technical Specifications requires that the Station Operations Review Committee review all procedures required by Specification 6.8 and changes thereto. Section 6.8.1 requires that written procedures shall be established, implemented and maintained for surveillance and test activities of safety related equipment. Administrative Procedure 3, "On-The-Spot Change", requires that if changes are made to procedures while in use for the performance of tests, these changes must be documented on Form AP-3-1, and then must be subjected to post-change review, including that of the department head, the site quality assurance engineer, the SORC chairman, and the station manager.

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Contrary to the Above:

During July 1984, on-the-spot changes were made to several safety related air filtration system in-place testing procedures, without obtaining the post-change review by the department head, the site quality assurance engineer, the SORC chairman, and the station manager. The Operational Test Group performed on-the-spot changes to revision 0 of procedure numbers M9-TVP-CR-001, M9-TVP-AB-011, M9-TVP-AB-012, and M9-TBP-AB-013 without obtaining the required review.

RESPONSE TO ITEM A:

1. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The items identified above as on-the-spot changes have been written, approved and implemented as permanent on-the-spot changes in accordance with Administrative Procedure AP-3. The necessity of utilizing proper procedures for implementation of any on-the-spot change has been reviewed with the individuals involved.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

See Paragraph 1 above.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

We are now in full compliance.

Item B

Section 6.4 of the Unit 1 and 2 Technical Specifications requires, in part, a retraining program for the facility staff that meets or exceeds the requirements of Section 5.5 of ANSI N18.1 - 1971. Section 5.5 of ANSI N18.1 - 1971, states that means should be provided in the training programs for appropriate evaluation of its effectiveness. Section 5.5.1 states that the retraining program should include, among other items, normal plant operating conditions and procedures, and operation of selected auxiliary systems important to overall plant safety. Administrative Procedure No. 14, Rev. 4, "Station Training Program", implements these requirements.

Administrative Procedure 14 states, in part, "The job performance of inspection, examination and testing personnel shall be evaluated initially and at two year intervals. The results of each evaluation shall be reviewed and documented by the department head..."

Contrary to the Above:

The Certificate of Qualification for a Chemistry Technical Assistant had expired on June 25, 1984, and the required requalification training was not provided in accordance with Procedure AP-14.

RESPONSE TO ITEM B

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Inadquate communication in the transfer of responsibility between personnel resulted in an oversight of this individual's records. The records of the Chemistry Technical Assistant in question were reviewed, his qualifications were deemed to be acceptable and his certification has been renewed in accordance with AP-14. In addition, the training files of all Chemistry personnel were reviewed, the qualifications were deemed to be acceptable and all applicable certifications were renewed in accordance with AP-14.

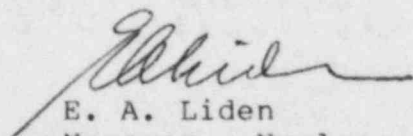
2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

The Salem Generating Station Inspection Order system will be utilized to ensure that all training files are reviewed and maintained in accordance with AP-14.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

We are now in full compliance.

Sincerely,



E. A. Liden
Manager - Nuclear
Licensing and Regulation

Mr. Thomas T. Martin

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C Mr. Donald C. Fischer
Licensing Project Manager

Mr. James Linville
Senior Resident Inspector