



**PSEG**

*To L NORRHOLOM  
FROM J. L. WILF*

*[Handwritten initials]*

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

Nuclear Department

November 8, 1984

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

Attention: Mr. Harry B. Kister, Chief  
Projects Branch No. 2  
Division of Project and Resident Programs

Gentlemen:

NRC COMBINED INSPECTION 50-272/84-32 AND 50-311/84-32  
SALEM GENERATING STATION  
UNITS NO. 1 AND 2  
DOCKET NOS. 50-272 AND 50-311

In the course of the referenced inspection, conducted on August 14 - September 24, 1984, two violations were identified involving failure to follow radiation protection procedures for posting high-radiation areas and failure to follow surveillance testing procedures for turbine stop and governor valves. PSEG's response to these violations is as follows:

NOTICE OF VIOLATION

Item A

Technical Specification 6.8.1 requires that written procedures for surveillance and test activities of safety related equipment be implemented. Surveillance Procedures SP(0)4.3.4.2, Turbine Overspeed Protection, requires that Turbine Valve Tests be performed in accordance with Operating Instruction (OI) III-1.3.3, Turbine Valve Tests, by depressing and releasing the "close TV" pushbuttons associated with the Stop-Governor Valve assemblies to cycle the valves. SP(0)4.3.4.2 also indicates that the procedure shall be considered satisfactory if all valves operate as required by OI II-1.3.3. In addition, Administrative Procedure No. 12, Technical Specification Surveillance Program requires that a work order be initiated per AP 9, Control of Station Maintenance, when a surveillance test does not satisfy the acceptance criteria.

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## Contrary to the Above:

Nos. 22 and 23 stop and governor valve assemblies did not open when the "close TV" pushbutton was released during testing on September 4, 1984. The SP(0)4.3.4.3 test was documented as satisfactory, and no work order was initiated to correct this deficiency.

## RESPONSE TO ITEM A:

In regard to this violation, the following facts are presented. The proposed notice of violation labeled as A is written in two parts, our response will address these as separate items.

- 1) "SP(0) 4.3.4.2 indicates that the procedure shall be considered satisfactory if all valves operate as required by 01 III-1.3.3." The valves fulfilled the procedural requirements by closing on demand. The fact that two of the valves required operator intervention in order to reopen does not constitute an unsatisfactory surveillance. The intent of the surveillance is clearly seen by looking at the basis as stated in the Technical Specifications:

"This specification is provided to ensure that the turbine overspeed protection instrumentation and the turbine speed control valves are operable and will protect the turbine from excessive overspeed. Protection from turbine excessive overspeed is required since excessive overspeed of the turbine could generate potentially damaging missiles which could impact and damage safety-related components, equipment or structures."

It is therefore concluded that the valves must close on demand without operator assistance. However, the re-opening of the valves does not, in any way, add to or detract from the safety significance of the components as stated in the Technical Specifications. As such, the opening of the valves can be performed with operator assistance.

- 2) "In addition, Administrative Procedure No. 12, Technical Specification Surveillance Program, requires that a work order be initiated as per AP-9, Control of Station Maintenance, when a surveillance test does not satisfy the acceptance criteria." Since the test results were considered satisfactory, no work order was required to be generated. The problem experienced during the performance of this surveillance has been seen before. The valves are normally inspected and repaired, if necessary, during the course of a unit outage.

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Work orders have been written to inspect each of the turbine stop valves during the current outage on Unit No. 2.

The purpose of the Turbine Valve Test procedure will be clarified to more specifically indicate that valve closure on demand fulfills the acceptance criteria for the test.

Item B

Technical Specification 6.11, Radiation Protection Program requires that procedures shall be adhered to for all operations involving personnel radiation exposure. Administrative Procedure (AP) 24, Radiological Protection Program, Section 6.1.2 requires that personnel comply with all radiation warning signs, instructions and other postings.

Contrary to the Above:

On September 6, 1984, personnel failed to comply with a radiological posting in that they remained in an area on the 84 foot elevation of the Unit 1 Auxiliary Building to perform work. The area was posted as a high radiation area - no loitering and the Extended Radiation Exposure Permit used by the individuals did not specifically authorize work for these conditions.

RESPONSE TO ITEM B

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

The work in question on September 6, 1984, was terminated when Radiation Protection was notified of the occurrence. The area in question has been reposted to more clearly demarcate the high radiation area. A special caution was added to the Extended Radiation Exposure Permit (EREP) in question to more clearly state that work in high radiation areas was not permitted. The personnel involved have been instructed on the procedures for working on an EREP in general and specifically the EREP that they were using.

With regard to the specific occurrence, all exposures as measured by self-reading dosimeters for the workers who remained in the area were less than 10mR. The entire incident was investigated by Radiation Protection Department staff and by the Radiation Assessor - Radiation Protection Services.

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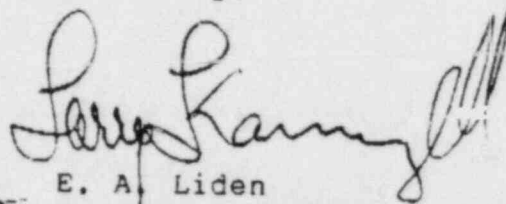
2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Reinforcement of the necessity and importance of adequate briefings to personnel regarding the meaning and content of the Radiation Exposure Permits and Extended Radiation Exposure Permits will be made. These instructions shall also be reviewed with contractor foremen, shop stewards, and supervisory personnel.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

PSE&G will be in full compliance by January 31, 1985.

Sincerely,

A handwritten signature in dark ink, appearing to read "E. A. Liden", with a stylized flourish at the end.

E. A. Liden  
Manager - Nuclear  
Licensing and Regulation

C Mr. Donald C. Fisher  
Licensing Project Manager

Mr. James Linville  
Senior Resident Inspector