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Electric and Gas
Company

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AUG 06 1996

LR-N96208

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

**TAGGING PROGRAM CORRECTIVE ACTIONS
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NO. NPF-57
DOCKET NO. 50-354**

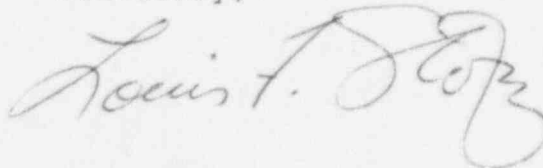
On June 7, 1996, the NRC issued Integrated Inspection Report 50-354/96-04 for the Hope Creek Generating Station. In that Inspection Report, the NRC requested that Public Service Electric and Gas Company (PSE&G) provide information relative to: 1) the planned corrective actions to prevent recurrence of problems concerning the implementation of the safety tagging program; and 2) the planned actions to monitor the effectiveness of these corrective measures.

Attachment 1 of this letter describes: 1) the results of common cause analyses conducted for recent Hope Creek tagging errors; 2) the key corrective actions taken and/or planned to prevent recurrence of these tagging errors; and 3) the measures being implemented to assess the effectiveness of these corrective actions and monitor tagging program implementation. Salem has also completed a common cause assessment of tagging errors and is working with Hope Creek to implement corrective actions to improve Safety Tagging Program performance.

PSE&G believes that management's clear expectations and enforcement of personnel accountability in addition to the corrective actions described in Attachment 1 will result in improved safety tagging performance.

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

Sincerely,



Attachment

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AUG 06 1996

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ATTACHMENT

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I. INTRODUCTION

In NRC Integrated Inspection Report 50-354/96-04, the NRC stated the following observations and conclusions about the Operational Safety Tagging Program:

On May 9, 1996, the inspectors observed the licensee's review of a safety tagging problem that had occurred earlier on May 8 at about 6:40 a.m. The licensee assessed that the safety consequences of the error were minimal, in that no personnel injuries or equipment damage resulted. However, the error resulted in the 5023 line [500kV main generator output] operating with degraded fault protection for about seven hours. The inspectors agreed with the licensee's assessment of minimal safety consequences for this event.

During additional follow-up review of this event with station and QA management, the inspectors observed that additional similar examples of improper safety tagging evolutions were described by QA during recent assessments, leading to overall findings of poor performance in operational safety tagging. Seventeen such events have occurred in 1996. Not all of these events resulted in equipment unavailability because the tagging process includes multiple barriers that ensure proper configuration of station systems.

The licensee provided prompt corrective actions for the individuals involved in the May 8 tagging error. The inspectors determined that the failure to properly implement the safety tagging program was a violation of station administrative procedures. During the review of this issue, the inspectors observed that the licensee had not yet fully developed preventive actions, nor had any means of monitoring the effectiveness of these preventive actions been developed.

II. PSE&G ASSESSMENT OF THE SAFETY TAGGING PROGRAM

PSE&G agrees with the findings and conclusions stated in the NRC inspection report relative to the Safety Tagging Program. To determine the corrective actions required to prevent tagging

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violations and monitor the program's effectiveness, a common cause assessment of tagging errors at Hope Creek was completed. Hope Creek's common cause assessment of tagging errors was initiated by station management after the May 8th event to evaluate the recent tagging deficiencies. The results of that assessment are described below and include corrective actions that PSE&G has taken and has planned to improve the Safety Tagging Program.

A. Results of the Hope Creek Common Cause Assessment

The purpose of the Nuclear Business Unit (NBU) Safety Tagging Program is to provide the necessary administrative controls to ensure the safety of personnel and equipment during plant maintenance activities. Boundary isolations protect personnel from high temperature and pressure fluids, electrical sources, uncontrolled equipment operation and other potentially dangerous equipment operations. The Safety Tagging Program also provides control over system configurations to ensure that equipment is protected properly and that the plant operates in a safe manner.

From the tagging error common cause assessment analysis, the root causes of the tagging errors at Hope Creek include: 1) unsatisfactory personnel performance; and 2) programmatic deficiencies. Personnel performance problems include inadequate supervisory oversight, poor work planning and deficient work practice (inadequate verifications and evaluations of tagouts). Programmatic deficiencies include inadequate program design and training.

B. Corrective Actions

The results of Safety Tagging Program assessment have been used to develop the following key corrective actions. PSE&G believes that these key corrective actions, combined with clear expectations for personnel accountability for the safety tagging of equipment, will result in a more effective Safety Tagging Program and improve its implementation.

After the May 8th tagging event at Hope Creek, the following corrective actions were taken:

1. A work stand down was held by the Operations Manager to re-emphasize the safety significance of Safety Tagging Program compliance.

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2. Hope Creek operations management issued an "Expectations For Implementing the Safety Tagging Process" memo to all Operations Department personnel. This memo included interim direction requiring an independent second verification of all tagging request approvals and independent second verification of all in-field tagging activities.
3. Appropriate levels of discipline were administered to the individuals involved.

To address broader personnel performance problems, station management has ensured that expectations have been clearly communicated and have implemented discipline for personnel involved in events to ensure personnel accountability. Since October 1995, Senior Management has communicated their expectations to NBU employees concerning: 1) procedure use and adherence; 2) the importance of the Safety Tagging Program; and 3) responsibilities for control of plant configuration. On July 18, 1996, the Senior Vice President of Nuclear Operations issued a memo to all Nuclear Business Unit employees emphasizing accountability and the importance of the Safety Tagging Program. PSE&G believes that compliance with the expectations rolled down to NBU employees, combined with a continued enforcement of personnel accountability, will result in improved safety tagging performance.

To address the programmatic deficiencies identified by the tagging error common cause assessment, the following key actions will be implemented:

1. A desktop guide is being developed, which establishes clear direction regarding the required elements for tagging package preparation and review. In addition, guidelines will be developed for the integration of tagout preparation into the work week process by August, 1996.
2. Active tagging requests and temporary releases will be evaluated and closed where appropriate. These evaluations are scheduled to be completed by September, 1996.
3. The Safety Tagging Program procedure, NC.NA-AP.ZZ-0015(Q), will be revised to simplify and improve the tagging process by clearly describing the process for adding and removing tags. These revisions are scheduled

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to be completed by October, 1996. In addition, Hope Creek Operations tagging procedures are scheduled to be consolidated into one procedure by October, 1996.

4. Staffing levels to support the Safety Tagging Program will be evaluated to ensure that appropriate staffing is in place to support this program. This evaluation is scheduled to be completed by December, 1996.
5. Personnel on the approved tagging list will be qualified to new Job Performance Measures (JPMs), which will be documented on qualification cards by February, 1997.

C. Safety Tagging Program Performance Monitoring

To evaluate the adequacy of Safety Tagging Program implementation and to determine the effectiveness of corrective actions implemented to prevent recurrence of tagging errors, the following actions will be taken:

1. Hope Creek Operations standards will be revised to ensure that assessments of tagging performance evaluate process barriers. These revisions are scheduled to be completed by October, 1996. The Hope Creek Operations department will also develop a performance indicator to segregate tagging errors in order to differentiate between an event, a near-miss, a pre-cursor or an administrative error. This action will be effective in evaluating the significance of tagging program errors. This performance indicator will be developed by September, 1996.
2. A method to monitor the performance of the tagging process at Hope Creek will be developed by November, 1996. This method will provide senior management with relevant information on overall tagging performance.
3. By October, 1996, the Hope Creek Operations Department will conduct an evaluation of Hope Creek Operational standards in order to: a) assess the effectiveness of identification areas of concern with tagging; and b) assess the effectiveness of performance indicators for the Safety Tagging Program.
4. By January, 1997, an evaluation of the effectiveness of corrective actions implemented to address the common cause deficiencies will be conducted by Hope Creek

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Operations. The need for additional corrective actions will be determined at that time.

5. In order to assess Safety Tagging Program performance, a follow-up evaluation of the effectiveness of corrective actions to improve implementation of the Safety Tagging Program will be conducted by June, 1997.