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May 23, 1985

Dr. Thomas E. Murley, Administrator
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Dr. Murley:

NRC INSPECTION REPORT #85-03
NOTICE OF VIOLATION
HOPE CREEK GENERATING STATION

Your letter dated April 25, 1985, transmitted the above reference Inspection Report which contained a Notice of Violation citing one (1) item of noncompliance concerning two (2) examples of failure to follow documented instructions. The following response is provided in accordance with the Notice of Violation.

As stated in Appendix A of the subject report:

10 CFR 50, Appendix B, Criterion V, states in part, that:
"Activities affecting quality shall be prescribed by documented instructions...and shall be accomplished in accordance with these instructions..."

- 1) Startup Procedure No. PSSUG-GTP-2, Section 5.6 states, that: "The technician shall cap or plug instrument tubing line with a tubing cap or plug..."

Contrary to the above, on January 16, the inspector identified disconnected instrument tubing line no. PBC-V-9989A, associated five valve manifold and instrument from a system that had been in test without end cap protection against dirt and dust.

- 2) Procedure No. SWP/P-135, Section 5.2 states, in part, that: "Prior to release of any components to PSSUG... verify proper installation, inspection by Field Engineering and Quality Control..."

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Contrary to the above, on January 17, 1985, the inspector noted that system 1-GMC-FSL-9564 A/B was not inspected prior to release for test.

Corrective Steps Taken and Results Achieved

1. The General Test Procedure, GTP-2, quoted above, is entitled "General Instrument Calibration Procedure for Field Devices" and provides in Section 5.6 for the preservation of interior cleanliness of instrument lines when field devices are removed for calibration. However, the instrument line identified in the Inspection Report was intentionally disconnected in preparation for the RHR system flush in accordance with GTP-1, "General Flushing and Cleaning Procedure".

The sequence of events during system flushing operations pertinent to instrument line cleanliness are as follows:

1. Disconnect instrument lines and install temporary gages.
2. Initial pump run.
3. System flushing/cleaning (pump driven) until process header and all alternate pathways are determined to be clean.
4. Remove temporary gages.
5. Flush system vents, drains and instrument lines.
6. Restore permanent plant gages to instrument lines.

A review of test package documentation for system BC (RHR System) indicates that the Inspector's observation was made prior to instrument line flush (step 5, above) and while the system was undergoing test (red blocking tag dated 12/26/84). Section 6.9.2.6 of package GTI-01M-BC01 documents that the referenced instrument line was flushed on February 16, 1985 (RHR pump C).

2. A review of the Release for Testing (RFT) Program was undertaken to assure consistency between the established practices and procedural requirements. At Hope Creek, the PFT Program is utilized to expedite the initial phase of the startup program (i.e. circuit checkouts, instrument calibration, pipe flushes, etc.) by releasing specifically identified components for testing. Since the RFT does not constitute a jurisdictional turnover to PSE&G, the Bechtel QA program remains in effect and provides for control of all Bechtel work operations required prior to system turnover. Assurance that final inspection activities are complete is a recognized part of the system turnover program and the applicable controls are described in Site Procedure SWP/P-135 and the Construction Quality Control Manual (CQCM).

Based upon our review of the program, it was determined that the release of components for testing prior to Quality Control inspection fully meets the intent of the RFT Program.

The complete requirement from Site Procedure SWP/P-135, Rev. 1, reads as follows:

Prior to the release of any components to PSSUG, the System Management Team will coordinate with the responsible Discipline System Engineer(s) to verify proper installation, inspection by Field Engineering and Quality Control, if applicable, and maintenance has been completed prior to release. Components with open NCR's, FCR's or FCN's may not be released to PSSUG.

This requirement could, however, be interpreted to imply that Quality Control inspection was required prior to RFT.

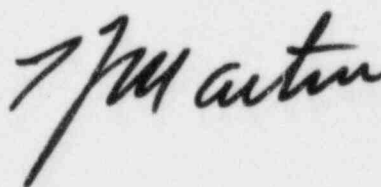
Corrective Steps Taken to Preclude Recurrence

1. None.
2. Site Procedure, SWP/P-135 has been revised to clarify the requirements for Quality Control verification prior to and after RFT and to more adequately detail interface requirements in similar situations.

The Date of Full Compliance

1. N/A
2. Full compliance was achieved on February 11, 1985, with the issuance of SWP/P-135, Revision 2.

Very truly yours,



Dr. T. E. Murley

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