

Public Service
Electric and Gas
Company

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July 10, 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:

SIGNIFICANT CONSTRUCTION DEFICIENCY
INCOMPATIBLE GREASE - LIMITORQUE OPERATORS
HOPE CREEK GENERATING STATION

On December 19, 1984, a verbal report was made to Region I, Office of Inspection and Enforcement representative, Mr. J. Strosnider, advising of a construction deficiency concerning the addition of grease to Limitorque operators that is incompatible with the grease supplied by the manufacturer. On January 21, 1985, a final report was submitted to your office. The following information is provided in accordance with 10CFR50.55(e).

On June 3, 1985, a verbal report was made to your office advising that Station Maintenance personnel may have improperly lubricated 146 Limitorque valve operators by adding valve stem lubricant (Exxon Unirex N-2 grease) to the valve operators. Exxon Nebula EP-0 is the approved lubricant for these Limitorque operators.

We have previously determined that the potential exists for the grease to cake or run out of the operators when incompatible greases are mixed. Hence, operation without failure cannot be assured. In that some of the Limitorque operators perform safety related functions, we cannot assure that the safe

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operation of the plant would not be adversely affected. We, therefore, consider this condition to be reportable in accordance with 10CFR50.55(e).

We have developed remedial and preventive measures addressing the problem. The remedial measures include:

1. Reinspecting the 146 valve operators in question. Removing the incompatible grease. Cleaning the operators and applying the proper lubricant.
2. Arranging for immediate vendor training to ensure proper disassembly/reassembly of valve operators.
3. Given that as many as three different lubricants may be applicable to a particular valve and operator assembly, the lubrication manual is being revised to incorporate pictures of all valve and operator configurations to ensure that there is no question as to where the correct lubricant is to be applied.

The preventive measures include:

1. Train all appropriate craft, supervisory and quality assurance personnel to ensure that the different valve/operator configurations are understood relative to lubrication. Revise the appropriate Maintenance Department procedures to reflect the lessons learned from this incident.
2. Revise Maintenance Department procedure MD-AP.ZZ-009(Q) "Control of Station Maintenance" to highlight the need for clear, precise wording of all work orders and to encourage the use of pictures as an aid to clarity.
3. Revise SA-AP.ZZ-009(Q) to provide guidelines for what to do if one is confused or does not understand given instructions. Train all appropriate personnel in these procedure changes.

Our intention is to complete the remedial actions by July 30, 1985, and the preventive measures by September 30, 1985. To date, 136 of the 146 valves have been inspected, cleaned and regreased with the correct lubricant.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. J. Martin".

C Office of Inspection and Enforcement
Division of Reactor Construction Inspection
Washington, D. C. 20555

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