

## APPENDIX A

### NOTICE OF VIOLATION

Public Service Electric and Gas Company  
Salem Nuclear Generating Station  
Hope Creek Nuclear Generating Station

Docket Nos: 50-272, 50-311, 50-354  
License Nos: DPR-70, DPR-75, NPF-57

During an NRC inspection conducted on November 10, 1996 - December 21, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.8.1 requires in part, that written procedures shall be maintained for surveillance and test activities of safety-related equipment.

Contrary to the above, written surveillance procedures for safety-related equipment were not maintained for the following two examples:

- (i) On November 7, 1996, the NRC identified that the implementing procedure for leak rate testing containment isolation valves was revised in 1982, 1994 and 1995 and failed to accurately reflect the test frequency requirements of Technical Specification Surveillance Requirement 4.6.1.8.2.
- (ii) On November 18, 1996, the licensee reported an event where the implementing procedure for testing the temperature of the standby liquid control system solution was revised in 1992 and 1996 and failed to accurately reflect the technical specification minimum temperature requirements of Technical Specification Surveillance Requirement 4.1.5.a.1.

This is a Severity Level IV violation (Supplement I) applicable to Hope Creek Generating Station.

- B. License Condition 2.E of License Number NPF-57 for the Hope Creek facility, and License Conditions 2.E of License Numbers DPR-70 and DPR-75 for Salem, require that PSE&G fully implement and maintain in effect all provisions of the physical security plan approved by the Commission and all amendments and revisions to the plan made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

The Public Service Electric and Gas Company Salem - Hope Creek Security Plan, Revision 8, dated October 2, 1996, states in Section 5.6, "Access Control to Vital Areas" that vital area access is physically controlled by the photobadge-keycard system which permits access into specific areas to persons designated on the current access list contained in the system computers. Positive access control is accomplished by security force personnel prior to issuance of the photobadge-keycard. Section 2.8, "Badge System," states in part that badges are required to

be displayed by personnel at all times while on-site, except when doing so is inconsistent with radiological or other safety considerations.

Contrary to the above, vital area access control and badge system requirements of the PSE&G Security Plan were not implemented for the following examples:

- (i) On December 10, and on December 16, 1996, NRC inspectors identified that vital area access was not physically controlled in that positive access control over photobadge-keycards was compromised, thereby creating an opportunity for unauthorized access to the vital areas. Specifically, on the first occasion, a badge issue station drop funnel had two photobadge-keycards stuck in it that were retrievable; and on the second occasion, during modification to the badge issue station drop funnels, one of the station funnels was dismantled, compromising the control of photobadge-keycards without maintaining positive control by a security force member.
- (ii) On December 16, 1996, NRC inspectors identified an individual in the Salem station protected area without a photobadge-keycard.

This is a Severity Level IV Violation (Supplement III) applicable to both Salem and Hope Creek Nuclear Generating Stations.

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted

invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania  
this 27th day of January 1997