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Electric and Gas
Company

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March 11, 1986

50-354

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 #85-61
NOTICE OF VIOLATION
HOPE CREEK GENERATING STATION

Your letter dated February 6, 1986, transmitting the subject report contained a Notice of Violation citing two (2) items of noncompliance. The following is provided in response to the Notice of Violation.

- A. Contrary to Startup Administrative Procedure 24 (SAP-24), during performance of Preoperational Test Procedure (PTP), PTP-AB-1, Revision 0 (Main Steam System) on December 12, 1985, the test sequence was changed, retesting was performed, and Quality Control Mandatory Witness Points were deleted without proper documentation and approval as required.

Corrective Steps Taken and Results Achieved

Steps within sections 8.1.16 and 8.1.18 of PTP-AB-1, Steam Line A&C Outboard Drain Line Isolation Valves, provide for system restoration subsequent to valve operation. Those steps verifying jumper removal and reconnection of lifted leads were designated as QC Mandatory Witness Points (MWP).

On November 25, 1985, preparatory and restorative steps had been performed, but the verification of proper valve operation and stroke time had not been completed due to valve indication problems. A test exception was taken

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to document that the timing of the main steam valves was not checked. QC signed off for system restoration on November 25, 1985.

After the test was completed, the cause of the valve indication problem was corrected. The test engineer retested that portion of the system. In order to perform the retest, jumpers had to be installed. Although the test engineer followed the appropriate procedures in PTP-AB-1, he did not identify the activities as a retest by lining through the applicable steps and re-signing the steps in PTP-AB-1.

When advised of his error, the test engineer re-signed and dated the appropriate steps. QC verified that the jumpers were properly removed and stamped PTP-AB-1 verifying that the proper restoration was made.

Corrective Steps Taken to Preclude Recurrence

The root cause was determined to be failure of the test engineer to document retest activities properly.

On December 21, 1985, training was held for all test engineers. Emphasis was placed on the proper method of closing test exceptions and documenting retests.

Subsequently, during the February 14, 1986, NRC exit interview, two (2) additional NRC violations were issued for failure to have QC sign a Mandatory Witness Point and inadequate results review. As a result of the additional violations, Hope Creek Generating Station has done away with the On-The-Spot (OTS) Change Program. All future changes to a preop test will be done by the use of a Change Notice which provides strengthened controls and affords Quality Assurance the opportunity to identify any additional Mandatory Witness Points associated with the proposed change.

Similarly, by memo dated February 19, 1986, the Startup Manager advised all Startup personnel of the nature of the 86-1 violations and our corrective action, which stated in part:

- The use of procedure review checklists is now mandatory for Public Service Startup Group (PSSUG) Test Review Board.

- Subsequent to the incorporation of Preoperational Review Committee (PORC) comments, the PSSUG Test Review Board will conduct an additional review of the test package to ensure that comments have been properly addressed and that there are no additional deficiencies.
- Management of each organization involved with Pre-operational Test Procedures results review has stressed the importance of a thorough and quality minded review process. The priority of quality over schedule demands has been reiterated and strongly emphasized with the reviewers.

The Date of Full Compliance

The date of full compliance was February 19, 1986.

- B. 1. Contrary to Bechtel Quality Control Instruction 10855/P-1.10, on November 3, 1985, a non-quality bolt was observed within the quality boundary of the core spray system in the Core Spray Pump D discharge flange. Final QC inspection had been completed on September 5, 1985 and had not identified the discrepancy.
2. Contrary to Bechtel Quality Control Instruction 10855/P-2.10;
- a. On December 12, 1985, retaining pins on Main Steam Line Snubber 1-AB-031-H04(Q) were observed to have not been properly installed. The final QC inspection had been completed and approved without exception on October 23, 1985.
 - b. On December 14, 1985, required retaining clips on support 1-P-EG-173-H44(Q) in the auxiliary safety cooling system had not been installed. Final QC inspection had been completed and approved without exception on June 13, 1985.

Corrective Steps Taken and Results Achieved

1. The non-ASME stud in the discharge flange of pump 10P206 was replaced with an ASME qualified stud in accordance with Startup Deviation Report (SDR) No. BE-0353

2. (a) The cotter pin on snubber 1-P-AB-031-H04 has been spread and QC performed a reinspection of the installed condition on December 12, 1985.
- (b) The missing retaining clip on support 1-P-EG-173-H44(Q) was replaced and QC performed a reinspection of the installation on December 18, 1985.

Corrective Steps Taken to Preclude Recurrence

The root cause has been determined to be an error in the final inspection activities performed by Bechtel QC. Since Construction of Hope Creek has been completed, the responsibility for Quality Control has shifted from Bechtel to PSE&G.

In response to the identified discrepancies the following investigative steps have been taken:

1. Bechtel personnel reinspected the bolting on six other flanges in the area of the cited deficiency. All other studs and nuts were found to be in compliance with the applicable ASME III requirements.
2. (a) Bechtel personnel reinspected six other snubbers in the drywell for proper installation of cotter pins. All cotter pins inspected were found to be properly spread.
- (b) Bechtel personnel reinspected seven similar supports at elevation 135' for proper installation of retaining clips. All supports were found to have the retaining clips properly installed.

Based upon this sampling program and its results, further expansion of the sample size was found unnecessary.

The Date of Full Compliance

The date of full compliance was February 19, 1986.

Sincerely,



Dr. T. E. Murley

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C Office of Inspection and Enforcement
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