

June 12, 1997

Mr. Leon R. Eliason
Chief Nuclear Officer and President
Nuclear Business Unit
Public Service Electric & Gas Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

SUBJECT: NRC INSPECTION NOS. 50-354/97-01

Dear Mr. Eliason:

This letter refers to your May 13, 1997 correspondence, in response to our April 14, 1997 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter regarding the evaluation, control and tracking of temporary scaffolding in your Hope Creek facility. To date, your immediate actions appear to be effective. However, these actions will be examined further during future inspections at Hope Creek.

Your cooperation with us is appreciated.

Sincerely,

ORIGINAL SIGNED BY:

James C. Linville, Chief
Projects Branch 3
Division of Reactor Projects

Docket No. 50-354

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cc:

L. Storz, Senior Vice President - Nuclear Operations
E. Simpson, Senior Vice President - Nuclear Engineering
E. Salowitz, Director - Nuclear Business Support
M. Bezilla, General Manager - Hope Creek Operations
J. McMahon, Director - Quality Assurance & Nuclear Safety Review
D. Powell, Manager - Licensing and Regulation
A. C. Tapert, Program Administrator
L. G. Canton, Regional Director, FEMA, Region II (EP Exercise/IRs **Only**)

cc w/copy of licensee letter:

A. F. Kirby, III, External Operations - Nuclear, Delmarva Power & Light Co.
J. A. Isabella, Manager, Joint Generation
Atlantic Electric
R. Kankus, Joint Owner Affairs
Jeffrey J. Keenan, Esquire
M. J. Wetterhahn, Esquire
Consumer Advocate, Office of Consumer Advocate
William Conklin, Public Safety Consultant, Lower Alloways Creek Township
State of New Jersey
State of Delaware

Mr. L. Eliason

3

Distribution w/copy of licensee letter:
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Public Service
Electric and Gas
Company

Louis F. Storz

Senior Vice President - Nuclear Operations

Public Service Electric and Gas Company

P.O. Box 236, Hancocks Bridge, NJ 08038

609-339-5700

MAY 13 1997

LR-N970290

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-354/97-01
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354

Ladies & Gentlemen:

Pursuant to the provisions of 10CFR2.201, Public Service Electric and Gas Company (PSE&G) hereby submits a reply to the notice of violation (NOV) issued to the Hope Creek Generating Station in a letter dated April 14, 1997. The details of the reply are contained in the attachments to this letter.

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

Sincerely,



Attachment



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Recycled Paper

9705-200312

C Mr. H. J. Miller, Administrator - Region I
 U. S. Nuclear Regulatory Commission
 475 Allendale Road
 King of Prussia, PA 19406

 Mr. D. Jaffe, Licensing Project Manager - Hope Creek
 U. S. Nuclear Regulatory Commission
 One White Flint North
 11555 Rockville Pike
 Mail Stop 14E21
 Rockville, MD 20852

 Mr. R. Summers
 USNRC Senior Resident Inspector (X24)

 Mr. K. Tosch, Manager IV
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REF: LR-N970290

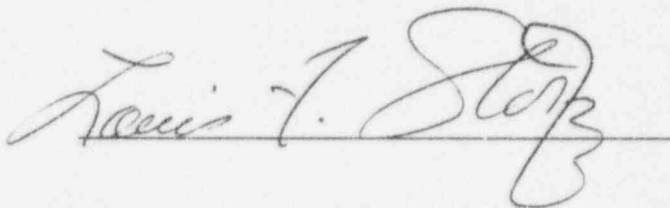
STATE OF NEW JERSEY)

SS.

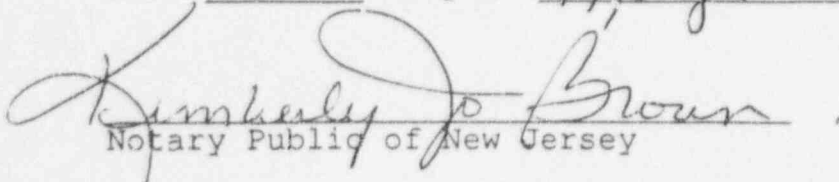
COUNTY OF SALEM)

Louis F. Storz, being duly sworn according to law deposes and says:

I am Sr. Vice President Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth in the above referenced letter, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn before me
this 13th day of May, 1997



Notary Public of New Jersey

KIMBERLY JO BROWN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 21, 1998

My commission expires on _____

ATTACHMENT 1
SCAFFOLDING DEFICIENCIES

INSPECTION REPORT NO. 50-354/97-01
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

LR-N970290

I. DESCRIPTION OF VIOLATION

The description of the violation contained in the notice of violation received in the April 14, 1997 letter is as follows:

A. Violation

"10 CFR 50 Appendix B Criterion V requires in part that activities affecting quality shall be accomplished in accordance with established procedures. These procedures shall include appropriate quantitative or qualitative acceptance criteria.

PSE&G Nuclear Administrative Procedure NC.NA-AP.ZZ-0023(Q), Revision 4, "Scaffolding and Transient Loads Control," requires that scaffolding installed in the (Hope Creek) station be appropriately tracked in a control log, periodically inspected for compliance with construction criteria, and promptly removed after completion of the work activity requiring the scaffolding.

Contrary to the above, on February 26, 1997, it was determined that several scaffolds installed in safety-related areas, including the "A" and "B" RHR pump rooms and the standby liquid control pump room in the reactor building of the Hope Creek station lacked appropriate construction documentation, had insufficient periodic inspections, and were not removed within a timely manner following the work activities that required the temporary structures.

This is a Severity Level IV Violation (Supplement I)."

II. REPLY TO VIOLATION

A. PSE&G Position

PSE&G agrees with the violation.

B. Reason for the Violation

Procedure NC.NA-AP.ZZ-0023(Q), Scaffolding and Transient Loads Control, provides detailed guidelines for scaffold

erection to satisfy the requirements for seismic II/I, fire protection, ventilation, and industrial safety. Recent scaffolding walkdowns identified deviations from NC.NA-AP.ZZ-0023(Q), including: insufficient periodic inspections, inadequate documentation for variances, untimely removal of scaffolding, and incorrect scaffold logs.

Based upon review of the failures to adhere to NC.NA-AP.ZZ-0023(Q) and review of the procedure and associated training, the cause of the failure to comply with the procedure is inadequate design and monitoring of the scaffolding program. Lack of program ownership in addition to inadequate training resulting in human errors also contributed to the violation.

With regard to inadequate design of the program, the instructions for installation and removal of scaffolding are contained in an upper-tier administrative procedure that controls both scaffolding and transient loads. The combination of these two factors resulted in a cumbersome and unclear procedure.

With regard to inadequate training, personnel involved in the installation and removal of scaffolding are provided with only 8 hours of a combination of classroom and hands on training. Because there are no qualification requirements for personnel involved with scaffolding, not all personnel performing the work had received training.

With regard to inadequate monitoring of the program, a method or requirement to audit the scaffold control log and the periodic inspections on a recurring basis did not exist and therefore audits were not performed.

As a result of the deficient procedure, inadequate training, and lack of program ownership, adherence to the procedure was not consistent. Periodic inspections were not performed as required, forms were not completed as required, and scaffolding was not removed in a timely manner following completion of work activities.

C. Corrective Steps That Have Been Taken or Are Ongoing and Results Achieved

1. Equipment operability concerns resulting from seismic proximity problems with scaffolding installed in the 'A' and 'B' Residual Heat Removal pump rooms were resolved.

2. The scaffolding installed in the Standby Liquid Control pump room has been inspected and the appropriate NC.NA-AP.ZZ-0023(Q) documentation has been completed.
3. Actions have been taken to ensure that the scaffolding currently installed in seismic controls areas is supported by the appropriate NC.NA-AP.ZZ-0023(Q) documentation and has current inspections.
4. Scaffolding supporting completed work activities has been evaluated for removal.
5. A single organization has been appointed as owner of the scaffold program.
6. Meetings were conducted with Hope Creek Maintenance, Civil Design Engineering and Nuclear Operations Services personnel to discuss the seismic II/I requirements of NC.NA-AP.ZZ-0023(Q).
7. Procedure adherence expectations were re-emphasized to the Civil Engineering Group.
8. Procedure adherence expectations are being re-emphasized during the Hope Creek Maintenance Intervention, which began on April 21, 1997.

D. Corrective Steps That Will Be Taken to Avoid Further Violations

1. Interim guidance for scaffold use and control will be communicated to appropriate departments by May 16, 1997. This guidance is consistent with, but in addition to, NC.NA-AP.ZZ-0023(Q).
2. Scaffolding installed in high radiation areas will be inspected based upon ALARA concerns.
3. Scaffolding deemed acceptable to be removed will be removed by May 23, 1997. Scaffolding removal in high radiation areas will be based upon ALARA concerns.
4. To address the cause of inadequate program design and monitoring, the Scaffolding and Transient Loads Control Procedure, NC.NA-AP.ZZ-0023(Q), will be revised by July 15, 1997. The revised procedure will continue to control scaffolding and will address the timeliness issue discussed in this violation. The control of