



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038-0236

Nuclear Business Unit

MAR 15 2000

LR-N000072

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

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT 05000272/1999010 & 05000311/1999010
SALEM GENERATING STATION NOS. 1 AND 2
FACILITY OPERATING LICENSES DPR-70, AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

Gentlemen:

Public Service Electric and Gas (PSE&G) provides the attached information in response to the Notice of Violation issued on February 14, 2000, in Salem Inspection Report 05000272 & 05000311/1999010

If you have questions regarding the information in this submittal, please contact Brian Thomas at 856-339-2022.

Sincerely,

A handwritten signature in black ink that reads "D. F. Garchow".

D. F. Garchow
Vice President –
Technical Support

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

Mr. W. Gleaves, Licensing Project Manager - Salem
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 08B1A
Rockville, MD 20852

Mr. S. Morris (X24)
USNRC Senior Resident Inspector - Salem

Mr. K. Tosch, Manager, IV
Bureau of Nuclear Engineering
P.O. Box 415
Trenton, NJ 08625

Attachment
Reply to Notice of Violation
LR-N000072

During an NRC inspection conducted from November 15 - 19, 1999, the following violation of NRC requirements was identified as described below:

License Condition 2.C.10 for Unit 2 requires PSEG to maintain in effect all provisions of the approved fire protection program, as described in the Safety Evaluation Report issued November 20, 1979, and subsequent safety evaluation reports. Section II.C of the November 20, 1979, Safety Evaluation Report states that the carbon dioxide gaseous suppression systems will be designed in accordance with NFPA Standards Numbers 12 and 12A.

National Fire Protection Association Standard on Carbon Dioxide Extinguishing Systems (NFPA 12), Section 2-4, Carbon Dioxide Requirements for Deep-seated Fires, specifies a fifty percent concentration of carbon dioxide for dry electrical wiring insulation hazards in general.

Contrary to the above, when tested in February 1979, the Unit 2 4160 Vac switchgear room total flooding carbon dioxide fire suppression system did not achieve a fifty percent concentration. This condition had not been corrected as of the date of the inspection in November 1999.

RESPONSE:

Public Service Electric and Gas (PSE&G) concurs with the violation.

(1) The reason for the violation

The reason for the failure to ensure that the total flooding carbon dioxide fire suppression system for the 4160 Vac switchgear rooms did not achieve fifty percent concentration when tested in the 1970's is attributed to a historical human performance error in conjunction with inadequate controls associated with system testing evolutions.

Since the 1970's, PSE&G has significantly revised the administrative processes for the control of plant changes including the controls associated with acceptance testing of systems impacted by the plant design change. Any discrepancies identified during modification testing that affect the operability of the system are required to be resolved prior to the system being turned over to the operations to be declared operable.

(2) The corrective steps that have been taken.

- a. Fire protection surveillance procedures were revised to ensure an adequate volume of carbon dioxide is available in the 10-ton carbon dioxide storage tank to flood the 4160 Vac switchgear to greater than 50% concentration with a second system discharge.

Attachment
Reply to Notice of Violation
LR-N000072

- b. The pre-fire plan for the 4160 Vac switchgear room provides guidance for the performance of an additional carbon dioxide discharge if necessary.

(3) The corrective steps that will be taken to avoid further violations.

- a. An assessment is being performed to determine the necessary changes to the fire protection systems in the 4160 vac switchgear rooms to address the overall fire risk of these rooms. This assessment will be completed by June 30, 2000. Upon completion of this assessment, PSE&G will submit to the NRC the overall resolution strategy for addressing the fire risk in this area and the schedule for completion of these activities by July 15, 2000.

(4) The date when full compliance will be achieved.

Full compliance will be achieved upon completion of item 3a above.