



(609) 693-6000 P.O. BOX 388 • FORKED RIVER • NEW JERSEY • 08868

September 21, 1981

Mr. Victor Stello, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stello:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 50-219/81-10
(Notice of Violation and Imposition
of Civil Penalty)

This letter is submitted in response to your letter of August 21, 1981, regarding the "Notice of Violation and Proposed Imposition of a Civil Penalty".

Jersey Central Power & Light Company accepts the violation as stated, therefore, a check in the amount of \$80,000 is enclosed as payment for the civil penalty. Attachment I to this letter details our response.

Should you have any questions concerning this response, please contact me or Mr. Michael Laggart of my staff at (609) 693-6932.

Very truly yours,

Philip R. Clark
Philip R. Clark
Vice President - Nuclear
Jersey Central Power & Light
Executive Vice President
GPU Nuclear

Sworn to and subscribed to before me this 21 day of Sept. 1981.

Michael W. Laggart
Notary Public

SB:MWL:lse
Enclosure

MICHAEL LAGGART
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires December 31, 1983

cc: Mr. Ronald Haynes, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731

The following states the violation and provides our response.

VIOLATION:

Technical Specification Section 3.5.A.4.a states in part, "... two reactor building to suppression chamber vacuum breakers in each line shall be operable at all times when primary containment integrity is required. ... The vacuum breakers shall move from fully closed to fully open when subjected to a force equivalent of not greater than 0.5 psid acting on the vacuum breaker disc."

Contrary to the above, one of the two vacuum breakers in each line, valves V-26-15 and V-26-17, was obstructed from moving to the fully open position by contractor installed scaffolding from the afternoon of April 16, 1981, during which time primary containment integrity was required.

This is a Severity Level II Violation.

RESPONSE:

Jersey Central Power & Light Company accepts the violation as stated. The violation occurred due to a lack of adequate control over the contractor activities being performed at the station. Upon identification of the existence of the violation by Station Management on the morning of April 18, 1981, the NRC was immediately notified in accordance with 10 CFR 50.72. Since the plant at the time was proceeding to a shutdown condition, the decision was made to bring the Reactor to less than 212°F rather than call out personnel to move the scaffolding. Either action would have resulted in being in compliance with Technical Specifications about the same time. As stated in the inspection report, the Reactor was in a cold shutdown condition at approximately 1:30 PM on April 18, 1981.

Immediate corrective actions to prevent recurrence were initiated. The incident was discussed with the contractor personnel and special sessions were held with all craft personnel on the controls and requirements in working at the station. All contractor work locations throughout the station were walked-down by Operations personnel to assure no other conditions existed which would be in violation of the plant Technical Specifications and/or affect the operability of plant equipment and/or components related to safety. No other items of contractor activities interfering with plant operating equipment were identified. Additionally, the Maintenance and Construction Division were directed to stress on-job supervision requirements with all their job supervisors to assure all controls imposed by the plant are strictly adhered to.

Prior to the occurrence, it had been procedurally required to have Operation Supervisors review the work scope and location of all contractor jobs with Contractor Job Supervision prior to the start of the job. This requirement applied to all activities that were to be performed with the plant operating which could impact upon the safety of the plant. The particular incident of concern that resulted in the scaffolding restricting the operation of the vacuum breakers was considered an activity related to the shutdown, and subsequently, was never reviewed by Plant Operations. Since the event, it is required that all contractor activities be reviewed by Plant Operations prior to the start of the job. This requirement is stated in all special procedures supporting contractor work. Additionally, all contractors and company employees are given a General Work Practice module in both new employee and annual retraining sessions.

This area of contractor activities and its affect on plant operation has been a long standing concern of Station Management as well as our Maintenance and Construction Division Management. Backfitting of an older plant like Oyster Creek to today's requirements has required JCP&L to install many new systems/ components while the plant is in an operating phase. This need to perform work with contractors while the plant is operating has been closely reviewed by Station Management, the Plant Operation Review Committee (PORC), and the General Office Review Board (GORB). A set of controls is in place which we believe provides us with assurance that the work will not affect the safety or operability of the plant. These controls are as follows:

1. All contractor work activities are governed by special procedures which are reviewed by the PORC and concurred with by Quality Assurance.
2. All special procedures have a requirement for the specific job to be "walked down" by Operations Supervision where additional controls for the protection of plant equipment are stipulated, if applicable. This review requirement has a sign-off provided in each procedure as a prerequisite to starting the job.
3. All contractors are required to attend orientation lessons prior to employment at Oyster Creek. During this session, a General Work Practice Module is presented. Included in this module are standard requirements and controls the plant expects to be implemented. These controls address general work practices with regard to working around plant equipment. It also addresses specific requirements with regard to operation of any equipment/components.
4. Administrative Controls that apply to all work at the station are referenced in the special procedure and each contractor working on the procedure is required to sign his acknowledgement/ understanding of these controls.

5. Plant Management, in their routine plant tours and the off-shift tour program, are constantly on the watch for physical plant conditions and the effect of contractor activities on systems/components. Jobs are stopped if these tours identify the observation of undesirable conditions.

While the above controls afford assurance that the jobs involving contractors are planned, reviewed and implemented to take into account any effect on plant safety and operability, the issue is still being reviewed and evaluated to upgrade our controls.

The management of the Corporate Divisions of Oyster Creek Operations, Maintenance and Construction, Technical Functions, and Nuclear Assurance have been tasked to develop a coordinated system of review, approval, and concurrence through all phases of modification work from planning, to development, to installation.

With the above controls in place and the continued review of this concern of contractor activities at the station, JCP&L is in full compliance. Part of our continuing review is periodic meeting between Plant and Maintenance and Construction Management to discuss better ways to effect more positive control. While we are in compliance, we are actively pursuing ways to improve the effectiveness of our controls.

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