

May 27, 1988

Docket No. 50-219

Mr. E. E. Fitzpatrick
Vice President and Director
Oyster Creek Nuclear Generating Station
Post Office Box 388
Forked River, New Jersey 08731

Dear Mr. Fitzpatrick:

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. 64687)

DISTRIBUTION

Docket

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The Commission has issued the enclosed Amendment No. 122 to Provisional Operating License No. DPR-16 for the Oyster Creek Nuclear Generating Station, in response to your application dated January 27, 1987, as supplemented March 16, 1988.

The amendment (Enclosure 1) incorporates the requirement to adhere to the "Plan for the Long Range Planning Program for the Oyster Creek Nuclear Generating Station" (the Plan) and the terms therein for implementing changes to its contents.

The staff's evaluation of the Plan is provided in Enclosure 2 and a copy of the current Plan (including current issues) is enclosed in Attachments 1 and 2 of Enclosure 2. The staff has reviewed the Plan and the current issues and has found them to be acceptable.

The Commission has previously issued Orders to the licensees of operating reactors, confirming their schedules for compliance to various requirements (e.g., Emergency Response Capability, etc.). The Commission has also issued and will continue to issue Generic Letters, Bulletins and Notices on various technical issues. Some of these documents have required significant action be taken by the facility management to modify plant equipment and procedures in order to enhance overall plant safety. The procedures used in the Plan, which you are required to follow, have been developed to improve the method of assuring that required plant modifications, including significant modifications required by the Commission, are completed in a more systematic and timely fashion. We also anticipate that the resulting improvement in control and management of available resources will facilitate plant modification efficiency and effectiveness.

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P PDR

Mr. E. F. Fitzpatrick

- 2 -

The notice of issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

original signed by

Alexander W. Dromerick, Project Manager
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 122 to DPR-16
2. Safety Evaluation

cc w/enclosures:
See next page

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JStolz
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Mr. E. E. Fitzpatrick
Oyster Creek Nuclear Generating Station

Oyster Creek Nuclear
Generating Station

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

GPU NUCLEAR CORPORATION
AND
JERSEY CENTRAL POWER & LIGHT COMPANY
DOCKET NO. 50-219
OYSTER CREEK NUCLEAR GENERATING STATION
AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 122
License No. DPR-16

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by GPU Nuclear Corporation et al., (the licensee), dated January 27, 1987, as supplemented March 16, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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P PDR

2. Accordingly, Provisional Operating License No. DPR-16 is amended by adding paragraph 2.C.(10) to read as follows:*

(10) Long Range Planning Program

The "Plan for the Long Range Planning Program for the Oyster Creek Nuclear Generating Station" (the Plan) submitted by GPIJ Nuclear Corporation letter C 311-88-2030 dated March 16, 1988 is approved.

- a. The Plan shall be followed by the licensee from and after May 27, 1988.
 - b. The Category A schedule shall not be changed without prior approval from the NRC. Categories B and C schedules may be changed without prior approval by the NRC.
3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz
John F. Stolz, Director
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Date of Issuance: May 27, 1988

*Page 5 is attached, for convenience, for the composite license to reflect this change. Remove pages 4a and 5.

2. C. (9) The requirements described in the Attachments to the Commission's Order dated March 14, 1983, for NUREG-0737 Item II.K.3.19, Interlock on Recirculation Pumps, are changed to an alarm in the control room to indicate that a fourth recirculation loop has been isolated and an alarm reflash to indicate that a fifth loop has been isolated. The schedule for implementing this requirement, including writing the procedures to use the alarm and training the operators, is the same schedule in the Commission's Order dated March 14, 1983. This schedule for implementation is prior to the restart from the Cycle 11 refueling outage. This license condition was expanded to include the schedule for implementation.

2. C. (10) Long Range Planning Program

The "Plan for the Long Range Planning Program for the Oyster Creek Nuclear Generating Station" (the Plan) submitted by GPU Nuclear Corporation letter C 311-88-2030 dated March 16, 1988 is approved.

- a. The Plan shall be followed by the licensee from and after May 27, 1988.
- b. The Category A schedule shall not be changed without prior approval from the NRC. Categories B and C schedules may be changed without prior approval by the NRC.
3. The effectiveness of this amended license is encompassed within the effective period which has been specified for the existing license: This license is effective as of the date of issuance and shall expire at midnight April 9, 1972.
4. This license amendment shall become effective January 1, 1982.

FOR THE NUCLEAR REGULATORY COMMISSION

/s/ Walter A. Paulson - for

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

*The license remains effective since a timely application dated March 6, 1972, has been filed for a Full Term License.

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 29, 1981

Amendment No. ~~106~~, 122



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ENCLOSURE 2

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 122

TO PROVISIONAL OPERATING LICENSE NO. DPR-16

GPU NUCLEAR CORPORATION AND
JERSEY CENTRAL POWER & LIGHT COMPANY

OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-219

1.0 INTRODUCTION

By letter dated January 27, 1987, and supplemented March 16, 1988. GPU Nuclear Corporation (GPUN, the licensee) submitted an application to amend the Oyster Creek Nuclear Generating Station, Provisional Operating License No. DPR-16, to incorporate the requirement to adhere to the "Plan for the Long Range Planning Program for the Oyster Creek Nuclear Generating Station" (OCNGS). In the licensee's submittal of March 16, 1988, the licensee made several minor plan changes in response to the staff's request. The licensee also made a minor change to the proposed license condition. The information submitted by letter dated March 16, 1988 provided clarification of the January 27, 1987 submittal.

The Program was developed by GPUN to enable GPUN to effectively manage implementation of significant changes to OCNGS which have been required, or proposed by the NRC, as well as other measures to enhance plant safety and reliability which have been identified by GPUN or other agencies (e.g, the Institute for Nuclear Power Operations).

The primary program objectives are to (1) optimize the allocation of GPUN and NRC resources to those projects necessary to assure safe, reliable, and economic plant operation and (2) achieve the appropriate balance and prioritization among all proposed projects based on their relative value and effect regardless of source.

The "Plan for the Long Range Planning Program for the Oyster Creek Nuclear Generating Station" (Attachment 1) is the implementation vehicle for the Long Range Planning Program. The Plan describes how the program functions, mechanisms for changing the program and updating it, the interactions and responsibilities of the NRC and licensee staffs under the program, and its resultant assessments and schedules. The format and content of this Plan closely follows the previously approved Big Rock Point Plan.

2.0 EVALUATION

2.1 Plan Description

The OCNGS Long Range Planning Program is based on a list of over 50 major projects and their completion dates each of which is assigned a priority resulting from an established assessment method. In general, this list will exclude minor capital and specific Operations and Maintenance funding requests (under \$50,000) unless the project could have a critical impact on major planned activities (e.g., inspections with potential for adverse contingencies) or is mandated by the NRC. The assessment method involves ranking each project based on its importance relative to public safety (e.g., safe shutdown, radiological release potential), personnel safety, plant availability/capacity factor and economic incentive.

The scheduling of major projects takes into account projections for budgets and site manpower and engineering support requirements for up to five years, on an item-by-item basis covering all major plant projects.

The Plan submitted by the licensee organizes the projects into Categories A, B and C based upon their origin. Completion schedules and periodic status reports identify critical project tasks, target completion dates, progress and problem areas which enable management to develop contingency and/or schedule recovery plans. The three categories are described below:

Category A - All projects involving regulatory issues which have resolution dates mandated by NRC rules, orders or license conditions.

Category B - Projects involving issues identified by the NRC and/or GPUN for which commitments have been made to the NRC by GPUN. The issue resolutions would result in significant (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements.

Category C - Other major projects, identified by GPUN or other regulatory agencies.

The Plan recognizes that projects, project scopes, and scheduled completion dates will need to be modified or deleted at times to reflect changes in regulatory requirements to accommodate those activities that GPUN finds necessary to improve plant efficiency and reliability, to incorporate the results of investigation into issues, and to take into account delays resulting from events beyond the licensee control.

2.2 Plan Implementation

The licensee's January 27, 1987 submittal (as supplemented March 16, 1988) incorporates a license condition requiring that GPUN follow the Plan and permits the licensee to make changes to the Plan and its issue resolutions and schedule for certain categories of issues in accordance with the provisions of the Plan. The staff has reviewed the licensee's Plan and has determined that:

1. Changes to issue resolutions and/or schedules for completion of major issues imposed by rule, order or license condition (Category A projects) will require prior NRC approval.
2. Issue resolutions and/or schedules for completion of major issues by the NRC and/or GPUN for which commitments have been made to NRC by GPUN (Category B projects) are identified and provisions are made in the Plan to require GPUN to provide the NRC with notification of changes to Category B projects.
3. Schedules for completion of other major projects identified by GPUN or other regulatory agencies (Category C projects) are identified and provisions are made in the Plan to require GPUN to notify NRC on a semi-annual basis of changes, deletions or scheduling of Category C projects.
4. Provisions are made in the Plan for incorporating new or anticipatory major issues into Category A and B as these issues are identified by NRC and/or formalized by rule, order or license condition.

The licensee identified each planned major NRC-required modification and major non-NRC modification as an individual line item in its list of Category Projects. Semi-annual reports of licensee progress towards implementation of NRC-identified and licensee-identified modifications are proposed by the licensee.

The licensee's proposal to incorporate a condition into the Oyster Creek provisional operating license provides an appropriate mechanism to ensure that the NRC is informed as to whether required safety-related issues are being completed in a timely manner. The Plan also provides a suitable mechanism for changes to completion dates (due to unforeseen circumstances) for modifications not imposed by rule or order and for keeping the NRC informed of such changes for its consideration. Thus, the degree of flexibility needed to assure effective program implementation is provided while at the same time ensuring the the NRC's responsibilities are not compromised.

The Plan and the proposed license condition submitted by the licensee are functionally identical to those approved by the staff in Amendment No. 82 to the Big Rock Point Plant operating license, Amendment No. 75 to the Pilgrim Nuclear Power Station operating license and Amendment No. 91 to the Duane Arnold Energy Center (DAEC) operating license. A copy of Amendment No. 91 was transmitted to all power reactor licensees by Generic Letter 83-20 on May 9, 1983. This letter identified the approach addressed by Amendment No. 91 as one which is acceptable to the NRC. Therefore, the staff has determined that (1) the Plan proposed by GPUN is equivalent to a previously approved plan, and (2) the license condition proposed by GPUN is equivalent to the previously approved license condition for Big Rock Point Plant on this subject.

2.3 Proposed Issues and Schedules

Attachment 2 to this enclosure provides GPUN's proposed list of major projects and schedules for completion of presently known GPUN-planned and NRC-required modifications.

For modifications imposed by rule or order, the utility proposes completion by the required dates, or has received an approval from the NRC for an extension of the deadline (e.g., Installation of Torus Temperature Instrumentation and Temperature indication recorded in the control room extension of deadline from refueling outage 11R to refueling outage 12R).

GPUN has proposed completion of other GPUN and NRC initiated modifications not required by rule or order on a schedule consistent with its previous commitments. As a sample, significant regulatory issues in this category include installation of cathodic protection system to arrest or mitigate identified corrosion of the drywell wall and replacement of nylon type relays with Century Tefzel Bobbin Type Relays. Based on our review of these projects and the remaining existing projects not listed above, we find the dates proposed by the licensee for completion of these modifications to be acceptable.

2.4 Summary

Based on the considerations addressed herein, we find that:

1. The proposal by GPUN, that its Plan be implemented by a license condition requiring the licensee to follow the Plan, is acceptable.
2. The licensee's proposal stating that changes to implementation dates imposed by rule, orders or license conditions will require prior NRC approval is acceptable.

3. Based upon our review, the completion dates proposed by the licensee in the submittal are reasonable.
4. The license condition and the Plan submitted by GPUN are equivalent to that already approved in Amendment No. 82 to the Big Rock Point Plant.
5. GPUN and NRC should be cognizant that there are likely to be higher priority and more urgent safety issues that are not included in the list because the projects do not exceed the threshold cost of \$50,000 or are not mandated by the NRC. The licensee tracks these safety issues using the GPUN licensing action item system for the OCNGS.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Dated: May 27, 1988

Principal Contributor: Alexander W. Dromerick

Attachments:

1. Plan for the Long Range Planning Program
2. List of Major Projects and Schedules

PLAN FOR THE LONG RANGE PLANNING
PROGRAM FOR THE OYSTER CREEK NUCLEAR GENERATING STATION

I. INTRODUCTION

GPU Nuclear Corporation (GPUN) has developed a comprehensive program which will enable GPUN to effectively manage implementation of significant changes to the Oyster Creek Nuclear Generating Station (O.C.) which have been required, or proposed by, the NRC, as well as other measures to enhance plant safety and reliability which have been identified by GPUN or other agencies (e.g., the Institute of Nuclear Power Operations). The program is identified as the "GPUN Long Range Planning Program". This program was developed to assess, coordinate and schedule major work tasks or projects at O.C., including those mandated or proposed by the NRC, or identified by GPUN and others. The program objectives are to (1) satisfy regulatory requirements; (2) provide sufficient lead times for modifications; (3) minimize changes for operators; (4) effectively manage financial and human resources; and (5) specify the framework for changes to developed projects and associated schedules. This will be accomplished within the overall objective of plant safety and availability.

This program reflects the recognition by GPUN and the NRC that fiscal and manpower resources are finite and that a limit on the onsite manpower is necessary. Routine functional plant operations and maintenance require a substantial portion of available resources, further limiting resources which can be applied to the resolution of non-routine but important regulatory and non-regulatory issues that arise. The program integrates a significant portion of presently planned non-routine work at O.C. over a nominal five-year period to ensure that tasks associated with issue resolution are properly assessed and effectively scheduled and coordinated. It provides a means for new requirements to be accommodated taking into account schedule and resource constraints, as well as the importance of implementing a new requirement. The purpose of this document is to describe the plan used to implement the program. It describes how the program functions, mechanisms for changing the program and updating it, the interactions and responsibilities of the NRC and licensee staffs under the program, and its resultant assessments and schedules.

The term project as used herein refers to the projected allocation of significant fiscal and manpower resources at O.C. The term issue resolution as used herein refers to the actions necessary to resolve concerns (safety related or otherwise) which have been identified by the NRC or GPUN.

II. SUMMARY OF PROGRAM DEVELOPMENT

The program is based on a list of projects and their projected completion schedules each of which is assigned a priority resulting from an established assessment method. The assessment method involves ranking each project based on its importance relative to public safety (e.g., safe shutdown, radiological release potential), personnel safety, plant availability/capacity factor and economic incentive.

The scheduling of projects takes into account projections for budgets and site manpower and engineering support requirements for up to five years, on an item-by-item basis covering significant plant projects. The list represents that significant portion of the O.C. work list and commitment list which is regularly modified and updated to meet changing conditions, including new NRC regulatory requirements. The final product of this program is the assessment of projects and the development of associated schedules as discussed below.

III. ASSESSMENT AND SCHEDULING

A first step in the development of this program involves the identification and listing of significant open issues and their associated resolutions. Following initial screening and evaluation of identified issues, those whose proposed resolution will require significant planning or resources are defined as proposed projects to be considered in development of the list of projects approved and proposed for approval by GPUN for O.C. over the next 5 years. An assessment of all proposed projects is required to determine their appropriate value/worth and relative priority. Upon completion of the project prioritization and subsequent ranking, the tasks are scheduled based on assigned priority, available resources and schedular constraints. The projects are organized into Categories A, B and C based upon their origin. Completion schedules and periodic status reports identify critical project tasks, target completion dates, progress and problem areas which enable management to develop contingency and/or schedule recovery plans. The three categories are briefly described below:

- Category A - All projects involving regulatory issues which have resolution dates mandated by NRC rules, orders or license conditions.
- Category B - Projects involving issues identified by the NRC and/or GPUN for which commitments have been made to the NRC by GPUN. The issue resolutions would result in significant a) plant modifications, b) procedure revisions, or c) changes in facility staffing requirements.
- Category C - Other major projects, identified by GPUN or other regulatory agencies.

Projects and/or implementation dates in Category A may be modified or deleted only with prior approval of the NRC. Changes to project scope and/or completion dates in Categories B and C require notification to the NRC as described in Section V. Categories A, B and C, taken together, provide a basis for assessing the overall effects of changes to projects and/or schedules, and a departure point for discussion between the NRC and the licensee regarding such changes, as discussed below.

IV. ISSUE RESOLUTION AND SCHEDULE MODIFICATIONS

Project schedules for each planning cycle include required milestones for engineering, procurement and, where appropriate, regulatory review and approval. Inability to meet these milestones may require changes to previous plans and schedules.

Accordingly, an important aspect of GPUN's planning effort is the recognition that projects, project scopes, and scheduled completion dates may need to be modified or deleted at times to reflect changes in regulatory requirements, to accommodate those activities that GPUN finds necessary to improve plant efficiency and reliability, to incorporate the results of investigations into issues, and to take into account delays resulting from events beyond GPUN's control¹. The method used by GPUN for changing or deleting projects or scheduled completion dates is established and will be incorporated in the Corporate Procedures.

V. GPUN AND NRC RESPONSIBILITIES

The proper functioning of the Long Range Planning Program requires that GPUN apply consistent criteria to the assessment of projects, monitor the progress of work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a project scope or schedule change is needed. As set forth herein the NRC will treat projects consistently and recognize that, when necessary, ranking, project scope, and/or scheduled completion date changes are based on a comparison of the project scopes and/or completion dates being changed to all projects, and also account for resource constraints.

A. PERIODIC UPDATING

GPUN will update Categories A, B and C semi-annually and submit the revised listing of projects and completion schedules to the NRC, beginning six months following NRC approval of this plan. The revised project listing will include the following:

- o Summarize progress in completing or implementing projects.
- o Identify changes since last update report.
- o Summarize the reasons for project scope and/or schedule changes associated with regulatory requirements.

¹ The listing of projects in Categories A, B and C will contain sufficient detail to identify those projects with tasks and/or completion dates keyed to refueling outages. In such cases, a change in outage period (i.e., initiation or duration) shall not be considered a schedule change.

B. CHANGES TO ISSUE RESOLUTIONS AND/OR SCHEDULES

Changes to the project listing may arise from a variety of reasons, such as new projects identified; modifications to the scope of scheduled work; unplanned outages; results of investigations into an issue (e.g., PRA findings); problems in delivery, procurement, etc; changes in NRC rules and regulations; or other NRC or GPUN actions.

Where it is necessary to add a new project or to change the schedule for a project, the following general guidance will be utilized to the extent appropriate:

- o Assess the priority of the project relative to all existing projects.
- o Schedule the new or changed project to avoid rescheduling other projects, if it can be reasonably achieved.
- o Select a schedule for the new or changed project which will help in maintaining an optimum integrated program of work.

Addition of activities to Category A requires GPUN to propose appropriate projects and/or completion dates and requires NRC approval of such proposals. Changes to previously established Category A resolutions and/or resolution implementation dates will be proposed only after GPUN has determined that changing Category B and C items will not significantly assist in maintaining Category A without change; or that safety, resource or schedule penalties from rescheduling Category B and C activities significantly outweigh the consequences of a change in a Category A completion date. As with proposals to add Category A activities, proposals to change previously existing Category A activities also requires NRC approval.

GPUN will inform the NRC Project Manager when serious consideration is given to requesting a change in Category A. When GPUN determines that a change in Category A is necessary, it will submit a written request for NRC approval.

Projects in Category B or C may be modified, deleted or rescheduled, or new projects may be added to Category C by GPUN without NRC approval; however, GPUN will inform the NRC Project Manager once a change, deletion, or addition to Category B is necessary. GPUN will provide the NRC with written notification of changes or deletions of Category B projects or completion dates associated with NRC initiated issues at a minimum in each semi-annual update but in any event at least 30 days prior to the scheduled completion date. Such notification will also include the reasons for the change and describe any compensatory actions which GPUN determines to be appropriate.

The change, addition or deletion in Category B will go into effect upon evaluation by GPUN, unless the NRC, in writing, requests further explanation or discussion. NRC requests will be made within 15 days of receipt of GPUN written notification. In this event, discussions will be initiated to promptly develop a project scope and/or schedule which is mutually acceptable to GPUN and the NRC Project Manager while considering overall program impact. The written notification by the NRC will serve to extend the schedule date for the period of time required for such discussion. If a revised project scope and/or schedule is established in these discussions, such project scope and/or schedule will supersede the project scope and/or schedule set forth in Category B. The revised project scope and/or schedule will be incorporated in a revised Category B in the next update submitted to the NRC. If a revised project scope and/or schedule cannot be established in these discussions, GPUN changes to projects scope and/or schedule will be effective unless subsequently modified by NRC Order.

In the event of unplanned delays, delays which become manifest within 30 days of the scheduled completion date or in the event of circumstances beyond GPUN's control, GPUN shall provide timely notification to the NRC Project Manager of the revised project an/or schedule date and incorporate it in a revised Category B in the next update submitted to the NRC.

GPUN will provide notification of changes, deletions, additions or rescheduling of Category C projects to NRC semi-annually. This is for information purposes.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to project scope and/or schedules are inevitable. Action required by the NRC is discussed below:

A. GPU NUCLEAR ORIGINATED CHANGES

1. Upon receipt from GPUN of a request for modification of Category A, the NRC will act promptly (consistent with resource availability and priority of other work) to consider and decide on the request.
2. If the request for a modification of Category A is denied, NRC shall promptly inform GPUN and provide the reasons for denial.
3. NRC consideration of GPUN changes to non-Category A projects and/or schedules is covered by Section V.B.

B. NRC ORIGINATED CHANGES (CATEGORY A)

It is recognized that formal NRC regulatory actions (i.e., NRC rules, orders, or license conditions) may: (1) impose a new regulatory requirement with a fixed date, or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with its overall regulatory responsibilities and, unless public health, safety, or interest require otherwise, will take into account the impact of such action on GPUN's ability to complete effectively the projects in Categories A, B, and C; and in consultation with GPUN, will try to minimize such impact. Although any formal regulatory action (i.e., regulatory rule, order, or license condition) taken by the NRC will be effective in accordance with its terms without inclusion in Category A, the NRC and GPUN recognize the desirability of incorporating such action into Category A, particularly in order to incorporate at the same time any other appropriate changes in the Long Range Planning Program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide GPUN a reasonable opportunity to propose overall changes in the Long Range Planning Program which would most effectively accommodate such requirements. Any resulting changes in projects in Category A will be (1) reviewed by the NRC, taking in account the overall objective of the Long Range Planning Program to use available resources effectively, and (2) if acceptable, approved by the NRC, and will thereupon be reflected in a revised Category A listing submitted by GPUN. GPUN will inform the NRC of any resulting changes in Categories B and C in accordance with Section V above.

C. NEW NRC ISSUES (CATEGORY B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. With respect to issues which the NRC requests (1) scheduling information or (2) responses by a certain date, these issues may be included in Category B in accordance with the project priority resulting from GPUN assessment. Projects and/or schedule date commitments resulting from GPUN evaluation will form the basis for discussions between the NRC and GPUN.

As for the case of NRC-originated changes to Category A issues, the NRC will provide GPUN a reasonable opportunity to propose overall changes in the total integrated plan program which would most effectively accommodate such issues. Any resulting changes in the integrated plan program will thereupon be reflected in a revised Category B or C list submitted by GPUN.

D. INSPECTIONS AND AUDITS

The Plan and the Long Range Planning Program implementation processes and procedures do not fall within the scope of GPUN's Quality Assurance Program or the requirements of 10CFR50 Appendix B. The existence of the Plan does not change the extent or nature of NRC inspection or audit activities which would be applied in the absence of the Plan. Specifically, the management processes by which resource limits are established and allocated are not subject to detailed audit or inspection. GPUN will provide information as discussed in Section V for review and/or approval by NRC of the basis for the Category A and B project schedules. Implementation of those projects are subject to inspection and audit as required by GPUN QA Program and NRC Regulations.

VII MODIFICATION TO THE PLAN

The licensee and the NRC recognize that the Plan itself may require future modifications. Accordingly, all Plan revisions will be submitted for prior NRC approval. The revisions will be made effective on a mutually agreed date upon or subsequent to amendment issuance by the NRC.

ATTACHMENT 2

OYSTER CREEK PROJECT LISTING

CATEGORY 'A' PROJECTS

 SORT BY CATEGORY/CYCLE/BA

 STATUS AS OF 25AFR88

OBS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
1	328232	STANDBY LIQUID CONTROL SYS MOD (SLCS) <small>RB</small> REPL SEALS ON 2 SBLC PUMPS; ADD BORON-10 TO SLCS - REVISE TECH SPEC TO MEET ATWS REQ TS AS DEFINED IN THE 10CFR50.62.	12R	NRR
2	402256	TORUS TEMPERATURE INSTRUMENTATION <small>TR RB CR</small> COMPLIANCE TO REG GUIDE 1.97, NUREG 0461/0783; INSTALL TEMP IND.; RECORD IN C.R.	12R	NRR
3	402631	ALTERNATE ROD INJECTION MOD (ATWS) <small>RB23 CR</small> INSTALL ALTERNATE ROD INJECTION SYSTEM. 10CFR50.62 RULE	12R	NRR
4	402854	C.R. HABITABILITY MOD <small>CR UC SR</small> TIE-INS OF CR HVAC SYSTEM INSTALLED DURING CYCLE 11. LICENSE CONDITION 2.C.B.	12R	NRR

OYSTER CREEK PROJECT LISTING

CATEGORY 'B' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25APR88

ORS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
5	402180	RADIOACTIVE GASEOUS EFFLUENTS MONITORING YARD MODIFY GAS SAMPLING SYS FOR NOBL GASES. INSTALL CHCK SOURCES & FILTER MECHANISMS CALIBRATE EQUIPMENT. NUREG 0737 & RETS.	11	NRR
6	402181	RAGEMS UNIT 2 FOR TB YARD MODIFY GAS SAMPLING SYS FOR NOBL GASES. INSTL CHCK SOURCES & LOW RANGE RAD MONI- TOR. CALIBRATE EQUIPMNT. NUREG 0737&RETS.	11	NRR
7	402719	MASONRY WALL MODS--PHASE II OB TB RESPONSE TO IE R. 80-11. SEISMIC UPGRADE 18 WALLS. RELOCATE EQUIPMENT. REINFORCE WALLS STRUCTURALLY.	11	NRR
8	402873	DRYWELL THINNING - CATHODIC PROTECTION TR INSTALL CATHODIC PROTECTION SYSTEM TO ARREST OR MITIGATE IDENTIFIED CORROSION OF THE DRYWELL WALL.	11	NRR
9	408077	ENHANCEMENT PROTECTED AREA BARRIER SYS YARD INSTL A NEW INTRUSION DETECT SYS(S.W. MICROWAVE STELLER E-FIELD SENSITR BURIED CABLE). INSTL CABL&CONDUIT & REINSTL MUX.	11	NRR
10	315302	SEP TOPIC III-1 EVALUATE DESIGN OF SPECIFIC COMPONENTS AND INCORPORATE RESULTS IN AN UPDATE TO THE FSAR. LAI 82251.06	12	NRR
11	323397	HFA RELAY REPLACEMENTS 4160 480V REPLACE NYLON TYPE RELAYS WITH CENTURY TEFZEL ROBBIN TYPE RELAYS.	12R	NRR

O Y S T E R C R E E K P R O J E C T L I S T I N G

CATEGORY 'B' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25APR88

DBS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
		IEB 84-02.		
12	328100	FW & CRD NOZZLE EXTERNAL UT INSPECTION INSPECTION OF FOUR (4) FW NOZZLES AND ONE (1) CRD NOZZLE. NUREG 0619. REMOVE INSUL., PREPARE SURFACES.	12R	NRK
13	328130	79-02 ANCHOR BOLT INSPECTIONS INSPECTION OF ANCHOR BOLT INSTALLATIONS.	12R	NRK
14	328160	RCS AUG - IGSCC INSPECTION INSPECT PIPING WELDS.	12R	NRK
15	328195	EFFECT OF LOCA ON TORUS TO DW BREAKERS MODIFY VALVES INTERNALLY AND EXTERNALLY TO MEET NUREG-0661 & GL-83-08 PERFORMANCE TECH SPEC SURVEILLANCES.	12R	NRK
16	402180	RADIOACTIVE GASEOUS EFFLUENTS MONITORING INSTALL NEW CHECK SOURCE FOR HIGH RANGE MONITOR, RECORDERS AND RATE METER.	12R	NRK
17	402181	RAGENS UNIT 2 FOR TR INSTALL NEW CHECK SOURCE FOR HIGH RANGE MONITOR.	12R	NRK
18	402811	CONTROL ROOM CONSOLIDATED DISPLAY INSTALL 3 NEW DIGITAL READOUTS ON PANELS 1F/2F, 8F/9F TIE-IN TO KEY C.R.	12R	NRK

O Y S T E R C R E E K P R O J E C T L I S T I N G

CATEGORY 'B' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25APR88

URS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
		EOP'S DATA. NUREG 0737 SUPP 1.		
19	402857	SW RADIATION MONITOR SYS UPGRADE REPLACE EXISTING MONITORING SYS WITH STATE-OF-THE-ART MONITORS TO MEET TECH SPEC REQUIREMENTS.	12R	NRR
20	402870	C R RECORDERS UPGRADE REMOVE & REPLACE 13 DEFICIENT/ OBSOLETE RECORDERS - REDUCE OPERATOR ERROR-NUREG 0737 SUP 1.	12R	NRR
21	402876	NEW SUPPORTS AND SUPPORT UPGRADES(79-14) UPGRADE EXISTING SUPPORTS AND INSTALL NEW SUPPORTS TO MEET ANS1 R31.1 DESIGN CRITERIA.	12R	NRR
22	402877	ISO EMERGENCY CONDNSR PENETRATIONS MOD INSTL RAFFLE PLATE & LEAK DET. SYS AT PENETRATION 5A INSIDE & OUTSIDE DW. HIGH ENERGY LINE BREAK CONCERNS.	12R	NRR
23	402879	RFS/ESG INSTRUMENT UPGRADE REPLACE 4 PRESSURE SWITCHES. OPERATIONAL/MAINTENANCE CONCERNS.	12R	NRR
24	328030	CNTRL RM HUMAN FACTORS DESGN REVIEW REPAINT, REFURBISH & RELABEL CR PANELS 1R THRU 11R INCLUDING 1XR & 9XR. NUREG 0737 SUP 1.	13R	NRR
25	328196	CRD NOZZLE INTERNAL INSPECTION ATTEMPTING TO DO UT INSP IN 12R IN ORDER NOT TO PERFORM PT INSP IN 13R.	13R	NRR

O Y S T E R C R E E K P R O J E C T L I S T I N G

CATEGORY 'B' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25APR88

ORIS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
		NUREG-0619.		
26	328204	RCS AUG - IGSCC INSPECTION DU RB75 RB92 INSPECT PIPING WELDS.	13R	NRK
27	402ACD	C R RECORDERS CR REMOVE & REPLACE APPROX. 15 DEFICIENT/ OBSOLETE RECORDERS - REDUCE OPERATOR ERROR. NUREG 0737 SUPP 1.	13R	NRK
28	402YYY	REMOVE DENS. COMP. FROM RX H2O LVL REC. CR REMOVE DENSITY COMPENSATION FROM REACTOR WATER LEVEL INSTRUMENTS. NUREG 0737 SUP 1.	13R	NRK
29	402B08	CONVRT COMPUTER RM TO GSSI/EMER DIR OFFC CFR PERMANENTLY REMOVE SIGMA COMPUTER FROM COMPUTER RM & CONVERT SPACE INTO GSS OFFICE. REQUIRES SECURITY PROOFING.	13R	NRK
30	402B59	ESW FLOW INDICATION (CONTROL ROOM) CR RB23 INSTALL (2) FLOW INDICATORS IN CR PANEL 2E & ASSOCIATED CABLES FROM RB23 TO CR. REG GUIDE 1.97 REQUIREMENTS.	13R	NRK
31	402B72	TORUS O2 SAMPLE LINE ISOLATION CR RB23 ADD A RELAY & LOCAL WIRING IN PANEL 11F. INSTALL CABLE FROM CR TO O2 ANALYZER IN RB23.	13R	NRK
32	402B79	RFS/ESG INSTRUMENT UPGRADE RB51 RB23 TB REPLACE 29 PRESSURE SWITCHES. OPERATIONAL/MAINTENANCE CONCERNS.	13R	NRK

OYSTER CREEK PROJECT LISTING

CATEGORY 'B' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25APR88

ORIS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
33	402888	RPV CAPSULE #2 119 INSTALL CAPSULE #2 IN 'R' VESSEL. NUREG 0822.	13R	NRK
34	328205	SQUG SUPPORT & PARTICIPATION - BWROG PARTICIPATION IN SEISMIC QUALIFICATION OF UTILITY GROUP FOR EQUIP SEISMIC QUALIFICATION. UNRESOLVED SAFETY ISSUE.	87-90	NRK
35	328092	VENDOR DOCUMENT CONTROL PROGRAM SEVM OF VENDOR MANUALS FOR EXISTING EQUIP VERIFY APPLICABILITY TO SUPPORT MAINTNC ACTIVITIES LAI-83139.60	87/89	NRK

OYSTER CREEK PROJECT LISTING

CATEGORY 'C' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25APR88

URS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
36	402138	ADDNL SPENT FUEL STORAGE RACKS INCR INCREASE STORAGE CAPACITY BY INSTALLATION OF RACK.	11	MRC
37	402792	CHLORINATION UPGRADE YARD REPLACE EXISTING CHLORINATION SYSTEM WITH 10% SODIUM HYPOCHLORITE SYS TO MEET NJEPA REQ'TS.	11	ERR
38	409522	MAC FACILITY REFURBISHMENT YARD REMOVE EXISTING TEMPORARY MAC FACILITY. INSTALL NON-COMBUSTIBLE MODULAR UNIT. NML COMMITMENT - COMPLETE BY 12-31-88.	11	ORR
39	402ACE	REPI. UPPER TB & OLD MACHINE SHOP ROOF YARD REPLACE THE UPPER TURBINE BUILDING ROOF, AND THE OLD MACHINE SHOP ROOF.	12	MRC
40	402763	WATER CHEMISTRY MONITORING SYSTEM RR51 YRD INSTALL PIPING FOR ON-LINE MONITOR OF DISSOLVED O ₂ & CONDUCTIVITY FOR FW DISCHARGE. SU&T OF RW SAMPLNG STA	12	MRC
41	402836	DILUTION PUMP HOUSE REPAIRS & MODS INT INSPECT & REPAIR OF CONCRETE. REPLACE TRASH CART AND RAILS.	12	MRC
42	323540	LP TURBINE INSPECTION TR COMPLETE INTERNAL INSPECT OF THE "C" LP TURBINE. REMV ROTOR FROM CASING.	12R	MRC

OYSTER CREEK PROJECT LISTING

CATEGORY 'C' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25AER88

OBS	BA NUMBER	DESCRIPTION	CYCLE / YEARS	CLASSIFICATION
		SANDBLAST UT INSP & REINSTALL ROTOR.		
43	328161	RCS STRESS IMPROVEMENT DW RB23 PERFORM STRESS IMPROVEMENT ON SELECTED PIPING WELDS.	12R	NRK
44	402840	H2 WATER CHEMISTRY IMPLEMENTATION TP CR RB AOC INSTALL SUPPLY LINES, CONTROLS, TIE-INS AND ECP MONITORS.	12R	NRK
45	323451	LP TURBINE INSPECTION ("A" & "B") TP COMPLETE INTERNAL INSPECTION OF THE "A" & "B" LP TURBINES. REMOVE ROTORS, SANDBLAST, UT INSP & REINSTALL ROTORS.	13R	MRC
46	328AHI	RCS STRESS IMPROVEMENT DW RB23 PERFORM STRESS IMPROVEMENT ON SELECTED STAINLESS STEEL PIPING WELDS IN RCS SYS.	13R	NRK
47	402636	WIDE RANGE NEUTRON MONITORING DW13 REG GUIDE 1.97 ITEM, NRC COMMITMENT UNDER REVISION.	13R	NRK
48	402816	ESW PIPING UPGRADE IN1 REPLACE/REPAIR DETERIORATED PORTIONS OF ESW PIPING AT INTAKE STRUCTURE.	13R	MRC
49	402845	UNDER VESSEL CABLING DW REPLACE EXISTING UNDERVESSEL COAXIAL CABLE AND CONNECTORS WITH QUICK	13R	MRC

O Y S T E R C R E E K P R O J E C T L I S T I N G

C A T E G O R Y ' C ' P R O J E C T S

Sort by CATEGORY/CYCLE/BA

STATUS AS OF 25AER88

OBS	BA NUMBER	DESCRIPTION	CYCLE/YEARS	CLASSIFICATION
		DISCONNECT ARMORED CABLE.		
50	323411	HP TURBINE INSPECTION COMPLETE INTERNAL INSPECTION OF THE HP TURBINE.	14R	MRC
51	328049	O.C. LOCA APPENDIX K RE-EVALUATION DEVELOP AN IMPROVED LOCA MODEL FOR OC IN ACCORDANCE WITH 10CFR50 APP. K.	87	NRR
52	328146	PROBABILISTIC RISK ANALYSIS UPDATE UPDATE EXISTING OC PROBABILISTIC RISK ANALYSIS TO INCORPORATE CHANGES TO PLANT SINCE 1978.	87-89	NRR
53	402011	OC REPLICA SIMULATOR DESIGN, FABRICATE, INSTALL A SIMULATOR DUPLICATING THE OC CONTROL RM FUNCTIONS FOR TRAINING PURPOSES.	87-90	NRR
54	328182	AS-BUILT DRAWING PROGRAM DRAWING REVISIONS TO REFLECT AS BUILT/ AS FOUND CONDITIONS.	87-91	NRR
55	328226	SQUG PROGRAM IMPLEMENTATION ESTABLISH SEISMIC QUALIFICATION FOR OYSTER CREEK.	87-91	NRR
56	328183	CABLE MANAGEMENT PROGRAM IMPLEMENT A NEW COMPUTER BASED CABLE MANAGEMENT SYSTEM.	87/88	IOE

OYSTER CREEK PROJECT LISTING

CATEGORY 'C' PROJECTS

SORT BY CATEGORY/CYCLE/BA

STATUS AS OF 25APR88

ORS	BA NUMBER	DESCRIPTION	CYCLE/ YEARS	CLASSIFICATION
57	328231	OC MATERIAL CONDITION EVALUATION UPDATE UPDATE MPR MATERIAL CONDITION STUDY TO INCLUDE PASSIVE COMPONENTS.	87/88	MRC
58	328215	DECAY HEAT REMOVAL RELIABILITY (ILS) REVIEW ADEQUACY OF EXISTING DHR SYSTEM AND EVALUATE NEED FOR ALTERNATIVE. USI A-45.	89	NRR
59	328216	STATION BLACKOUT DEVELOP COUING CAPABILITY STUDY ADDRESSING STATION BLACKOUT. USI-A44.	89	NRR