GPU Nuclear

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February 22, 1984

Mr. James Lombardo
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Generic Letter 83-28

With respect to our response to Generic Letter 83-28 dated November 14, 1983, please be advised that the response to Item 3.1 "Post-Maintenance Testing (RTS)" contains a typographical error. The fifth paragraph should read "This is consistent with the BWR RPS logic testing design features." Again, for clarity, the word "inconsistent" should be replaced with "consistent". Attached is a corrected page to replace the one provided with our November 14, 1983 response.

Very truly yours,

James Knubel
Manager, BWR Licensing

lr/0129e

cc: M. Laggart

A055
1/0

3.1 Post- Maintenance Testing (RTS)

Current Status of Conformance

1. For all maintenance performed on Important to Safety Systems, post-maintenance testing must be considered. It is the responsibility of the Maintenance Job Supervisor to specify the post-maintenance testing requirements in consultation with cognizant operations and engineering personnel as deemed appropriate by the Job Supervisor. Following completion of maintenance activities, the Group Shift Supervisor is responsible to assure that post-maintenance testing adequately demonstrates the operability of equipment/systems before returning equipment to service.

   For immediate maintenance items, the Group Shift Supervisor assumes the planning and control responsibility for specifying post-maintenance testing normally performed by the Job Supervisor. In this capacity, the G.S.S. may consult with Maintenance, Rad Con, and Engineering personnel.

   In any case, the adequacy of post-maintenance testing is the responsibility of the G.S.S. The G.S.S., who holds an SRO license, uses his judgement and knowledge of plant systems to make this evaluation.

   A review of the Oyster Creek Technical Specifications indicates that post-maintenance testing is not required for Reactor Protection System components. This is considered to be a deficiency. A Technical Specification change will be submitted to add requirements for post-maintenance testing of RPS components.

   RPS surveillance test procedures test the operability of RPS equipment down to, but not including, the action initiating device. RPS components not tested are the scram valves, pilot scram valves, and rod drive mechanism. This is consistent with the BWR RPS logic testing design features. These procedures have not been re-reviewed as part of this reponse. These procedures have been reviewed by station engineering personnel, PORC and Q.A. as part of the normal procedure review and approval process.

2. NSSS vendor recommendations are addressed in the form of SIL's, TIL's and FDI's, and other product information documents which are assigned to station engineering personnel for evaluation and implementation into plant procedures. Other vendor information is not controlled as previously stated in response to item 2.2.2, thus integration of this information into plant procedures is not asssured.

3. Technical Specifications do not require post-maintenance testing for RPS components. The proposed Technical Specification referenced in response to Item 3.1.1 will consider the effects of testing frequency of RPS reliability.