JCP&L GPU

Jersey Central Power & Light Company
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960
(201) 455-8200

August 9, 1979

Mr. Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Ziemann:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Bulletin No. 79-08

This is in reply to your letter of July 20, 1979 which requests information in addition to that provided in our submittal, dated April 25, 1979, in response to IE Bulletin 79-08. Our responses to the items in the enclosure to your letter are given below:

Item No. 1

A review of the actions required by Item No. 1 of IEB 79-08 was completed for all licensed operators, plant management, and supervisors with operational responsibilities with the exception of two(2) licensed operators by April 25, 1979. The two (2) licensed operators participated in a review which was completed by May 31, 1979.

Item No. 2

1. A review of the design of the initiation of containment isolation for all lines penetrating containment which could be possibly open during normal operation is contained in our response to this item. Procedures for the initiation of containment isolation are contained within our emergency procedures. The emergency procedures were updated to incorporate the necessary verification and manual actions necessary to initiate primary containment isolation during accident situations. This action was completed prior to June 1, 1979.

2. Item No. 2 of IEB 79-08 requires isolation of all lines or systems, upon automatic initiation of safety injection, unless it would degrade safety features or cooling capability. Several lines or systems were identified as not meeting the desired criteria. Either justification for not meeting the criteria or committment to modify is specified below.

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a. Reactor Water Cleanup System - this is a closed system connected to the reactor pressure vessel which penetrates primary containment. This system isolates on low-low reactor water level, indicative of a process pipe rupture should it occur. A modification which would also isolate this system on high drywell pressure or other diverse parameters is being reviewed and will be installed during the next refueling outage scheduled for January 1980.

b. Shutdown Cooling System - Isolation valves for the shutdown cooling system are interlocked to prevent their opening until reactor coolant temperature is below 350°F in the reactor recirculating loops. Since the shutdown cooling system provides reactor cooldown capability at temperatures less than 350°F, and automatically isolates on a low-low reactor water level condition, protection against a small break LOCA initiated by the system is provided. However a modification which would also isolate this system on high drywell pressure or other diverse parameter is being reviewed and will be installed during the next refueling outage scheduled for January 1980.

c. Main Steam Drain Line - main steam lines penetrating the primary containment do not isolate on high drywell pressure mainly because the steam lines connect the reactor to the primary heat sink. Isolation of the drain valves is already provided by low-low reactor water level, main steam line high radiation, low main steam line pressure or steam line break. Since the drain valves are not connected to the primary containment atmospheres and during normal operation are in the closed position, isolation on high drywell pressure is considered unnecessary.

d. Isolation Condenser Vent Lines - the vent lines are located outside primary containment and vent to a point downstream of the main steam line isolation valves (MSIV's). Since these valves close on initiation of the isolation condensers and the same signals which close the MSIV's, closure of these valves on high drywell pressure unnecessarily removes the venting capability of the system and could possibly subject the system to conditions which could render the system inoperable.

e. Instrument Air Lines - the instrument air lines penetrating primary containment will be modified to incorporate an isolation valve outside primary containment. The design of the modification is undergoing preliminary review. (The modification is intended to be installed during our 1981 refueling outage). As an interim measure, applicable emergency procedures contain the necessary instructions to isolate this line from the drywell.

f. Reactor Building Closed Cooling Water Lines - RBCCW lines penetrating the primary containment comprise a closed system relative to both the reactor coolant pressure boundary and the primary containment atmosphere. The normal system pressure is higher than the design pressure of the containment vessel. The function of the system within the drywell is to provide a heat sink for the containment atmosphere and provide cooling for the recirculating pump seals and motors. Incorporation of automatic isolating signals to isolate this system from the drywell would limit the use of this system during transients. Instructions have been placed into emergency procedures to isolate this system from the drywell during pertinent emergencies. Therefore, automatic isolation on high drywell pressure will not be incorporated. The system can be isolated from the containment using controls available in the control room.

g. Torus Vacuum Breaker Lines - the line penetrating the suppression chamber from the Reactor Building provides protection against the possibility of exceeding the external design pressure of the chamber. The line is provided with two(2) check valves and two(2) air-operated butterfly valves in parallel. The normal position of the valves is closed. The initiating signal which opens the butterfly valves is a chamber pressure .5 psi less than the reactor building pressure. Once the chamber pressure has approached the reactor building pressure, the valves close. The check valves provide additional protection against steam from the chamber to the reactor building. Addition of a high drywell pressure isolation signal to these valves is planned to take place during the 1981 refueling outage.

h. Containment Ventilation Exhaust Lines - the containment ventilation exhaust valves can only be opened during an isolation signal by deliberate operator action involving operation of a key lock bypass switch while the mode switch is in any other position except "Run". Emergency procedures direct the operator to the proper method of purging the containment during an emergency situation. Otherwise, the combination of the drywell isolation signal (high drywell pressure) and the keylock switch prevent inadvertently releasing radioactive gases from the primary containment during an accident situation.

Item No. 4

1. Other redundant information which the operator might have to determine changes in reactor coolant inventory is as follows:

   a. drywell high pressure

   b. suppression pool high temperature

c. safety relief valve high temperature

d. feedwater - steam flow rate mismatch

e. containment dewpoint and temperature

f. decreasing reactor pressure

g. suppression pool water level increasing

h. identified and unidentified equipment and floor sump leak rates

i. equipment area temperature

j. area radiation monitors (Outside Containment)

2. Operators have been instructed to utilize other available information to initiate safety systems. The instructions were part of the review provided in response to Item No. 1 of IEB-79-08 and were completed as specified in that item.

Item No. 5

All actions committed to in the response to this item have been completed.

Item No. 6

1. Locked safety system valves are verified for their correct position and the presence of their locking device during the normal performance of system valve checkoffs prior to startup following a refueling outage, as specified in pre-critical system status checkoffs, or as controlled by the plant switching and tagging procedures.

2. A review of ESF and safety-related procedures, including valve checkoffs, is presently underway. Initial estimates for completion of this endeavor projected a completion date of September 28, 1979 which was supplied to I & E Region I. As an interim measure, sketches of instrumentation valves not originally included in checkoffs have been added to the checkoffs to complete the necessary valving. Additionally, these systems were walked down to verify that valving was in it's proper position. Further work is necessary to update the supportive documentation to a condition indicative of system status and to determine its effect on procedure content. After working on several systems, a better estimate for completion of this endeavor would be December 31, 1979.

3. Again as an interim measure, instrumentation valve position verification following completion of surveillance procedures is performed by an independent verifier using a sketch of the instrumentation layout. This verification is performed following performance of procedures which do not control the verification of the valve position within the body of the procedure. The completion of review of applicable procedures would depend on completion of actions specified in 2 above. Completion is expected by December 31, 1979.

4. Position verification for all safety-related valves was performed prior to June 1, 1979. This verification was performed in two (2) steps. The first verification was performed during our plant shutdown of April 7, 1979. Further verification of safety related valve position was performed May 4-11, 1979. in conjunction with the I&E Inspection pertaining to this bulletin.

Item No. 7

1. The systems designed to transfer radioactive gases or liquids outside of the containment area are as follows:

   a. Drywell Equipment Drain Tank System

   b. Drywell Floor Drain Sump

   c. Drywell Purge Isolation Valves

   d. Drywell N_2 Relief Vent Valves

   e. Torus Vent Valves

   f. Drywell & Torus O_2 Sample Lines

   g. Clean up - (letdown)

2. Inadvertent transfer of radioactive gases or liquids out of containment is precluded by the incorporation into applicable emergency procedures of steps to not reset the primary containment isolation signal until sample can be taken of the atmosphere and liquids contained within. This action was completed prior to June 1, 1979.

3. The clean up system letdown line could be used to transfer reactor coolant to either the main condensers or the station radwaste facility. The procedure that directs the control room operators to use the letdown system will be reviewed and changed before September 15, 1979 to provide instructions in cases of potentially high coolant activity. The proposed modification identified in our response to item No. 2 will effectively isolate this transfer pathway on those signals that will isolate the reactor water clean up system.

4. Valves serving as the isolation barrier for primary containment are leak rate tested each refueling outage to assure valve integrity. Additionally, the setpoint of the instrumentation utilized to initiate primary containment isolation is verified monthly. Furthermore a functional primary containment isolation test is performed at each refueling outage to verify closure of all automatic isolation valves by the initiation signal.

Item No. 8

1. Adminstrative procedures for tagging and switching have been changed to incorporate a "Switching and Tagging Request Form". This form is utilized to control those activities required to remove and place a system into service. Not only does it document the tagging and switching which takes place to remove a piece of equipment from service, but also provides the documentation of the testing which is required prior to removing equipment from service, and after placing it back into service. Testing of redundant systems or components is required by the Switching and Tagging Procedures prior to removing equipment from service. Previous routine surveillance is acceptable only if performed within the accelerated surveillance frequency specified for the equipment out of service condition. Required testing is determined by the Shift Supervisor or the Supervisor-Station Operations. Since, maintenance and test procedures do not presently control the operability test, nor were they intended to do so, the issuance of the change to the administrative procedure is considered to satisfy the requested committment.

2. Administrative Procedure 106, "Conduct of Operations", has been revised to require the completion of the Shift "Turnover Check Sheet" by the Group Shift Supervisor, Group Operating Supervisor and Control Room Operator prior to leaving his shift. These turnover sheets encompass the documentation of the status of all safety systems as well as a good portion of the balance of plant systems. The oncoming personnel are required to read and sign the shift turnover sheet. This evolution is considered to satisfy your concern pertaining to explicit notification about status of systems.

3. The review is completed and the administrative procedures have been changed to provide the necessary control concerning the retest of systems prior to the need for operability. Maintenance and test procedures are not utilized to control the retest of systems, since the type of maintenance or testing dictates the specific testing that may be required. Any configurations which are not controlled by surveillance test procedures are controlled by the administrative procedures. Therefore, the revisions to the administrative procedure provide assurance that retesting of systems is completed prior to need for operability.

Item No. 11

No changes are proposed to the Technical Specifications as a result of implementing items 1-10 of IEB-79-08.

Very truly yours,

Ivan R. Finfrock, Jr.
Vice President

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cc: Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region 1
631 Park Avenue
King of Prussia, Pennsylvania

NRC Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, D. C. 20555

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