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February 28, 1979

Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch  
Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
IE Inspection No. 50-219/78-04

855 136

Our letter dated April 27, 1978 to your office on the subject of IE Inspection No. 50-219/78-04 stated that a corrective action program consisting of a short term and a long term program would be established to resolve the infraction identified as "Item A" and relating to single record storage. The purpose of this letter is to appraise you of JCP&L's progress in this area.

A major factor in both the short and long term corrective action program is a single record storage facility. In establishing the requirements for such a facility, JCP&L evaluated Regulatory Guide 1.88, ANSI N45.2.9, Sections 5.5 (Safekeeping), 5.6 (Facility), and 5.7 (Audits) and NFPA No. 232-1975 for Class A, four hour minimum rating. The types of facilities investigated included above ground archival storage facilities, underground archival storage facilities, and bank vault storage facilities. The basic criteria included compliance with the above requirements and record accessibility. Our decision was to store single copy records in a bank vault which is close to Oyster Creek Nuclear Generating Station. This decision was made because JCP&L concluded that the vault more than complies with the intent of Regulatory 1.88 for single record storage and that the proximity of the facility to the station makes it very accessible to the station.

Access to the bank vault will be available during normal banking hours or anytime in a valid emergency. Record security is assured by requiring both an authorized JCP&L and bank representative to gain access to the records. This is accomplished by means of a pair of either combination and/or key locks, one of which is controlled by each party.

JCP&L currently intends to utilize this bank vault for single copy records which cannot be easily reproduced such as strip charts and radiographs. With regard to achieving compliance in this area, it is planned to have transferred the bulk of the single copy records, which are difficult to produce, to the bank vault by March 20, 1979.

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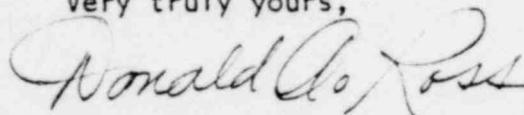
With regard to those records which we intend to incorporate into our duplicate record system, several actions have been taken. JCP&L is continuing to incorporate the backlog of records and the additional, current records, which have not previously been included. The progress of this effort has been monitored through the audit system. The Document Center record retention system is being upgraded through several distinctive steps:

1. The Morristown Document and Micro Processing Center facility is being enlarged and upgraded to better accommodate the expanding service.
2. JCP&L has purchased the necessary equipment to start microfilming records. The delivery of this equipment has progressed to the point where we should have sufficient equipment to start filming in March 1979.
2. JCP&L is working on an enhanced indexing system to further aid in record recovery. As a result of unexpected complications, it is too soon to predict when this effort will be complete.

With regard to the records originally stored over the Oyster Creek Control Room, certain records have been boxed and are ready for transfer to the bank vault; certain records have been boxed and are awaiting incorporation into the Document Center as part of our program to incorporate the backlog of records; and other records, which are not required to be retained, have been appropriately handled. Regardless of the specific record disposition, all records have been removed from over the Control Room.

We are continuing to implement our document retention program and expect to achieve additional milestones in the future. The purpose of this letter is to notify you of our progress as committed to in our April 27, 1978 letter.

Very truly yours,



Donald A. Ross, Manager  
Generating Stations-Nuclear

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