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November 21, 1979

Mr. H. R. Denton
Director, Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

Subject: TMI-2 Lessons Learned Short-Term Requirements

Reference: (a) H. R.Denton's October 30, 1979 letter to all operating reactors.

(b) D.Eisenhut's September 13, 1979 letter to all operating reactors.

(c) I. R. Finfrock's October 19, 1979 letter to D. Eisenhut.

(d) T. D.Kennan's (Chairman, BWR Owners' Group) October 17, 1979 letter to D. Eisenhut.

(e) D. G. Eisenhut's November 14, 1979 letter to T. D. Kennan (Chairman, BWR Owners' Group)

Reference (a) requested that all operating reactor plants provide justification for not agreeing to meet the exact requirements and schedules as specified in NUREG 0578 and as modified and/or supplemented in Reference (b).

The enclosure to Reference (c) provided JCP&L's positions regarding our intention to implement the requirements and schedule of NUREG 0578. For most NUREG 0578 items, JCP&L intends to satisfy all appropriate requirements and schedules; however, for those items which the precise requirements will not be met, a brief explanation was provided. All deviations from NUREG 0578 requirements fall into one of the following categories:

A. BWR Design and Operational Considerations

This category includes items for which BWR's already include design features or have had operational experiences which satisfy the intent of NUREG 0578. Justification for a BWR approach to satisfying certain NUREG 0578 items was forwarded to the NRC by the Chairman of the BWR Owners' Group in Reference (d).

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NUREG 0578 items which were originally in this category for Oyster Creek are:

2.1.2 - Safety and Relief Valve Testing

2.1.3a - Direct Indication of Valve Position

2.1.9 - RCS Venting

2.1.9 - Containment Water Level Monitor.

On November 19, 1979 JCP&L received a copy of ref (e) which stated that the NRC does not concur with a number of Owners' Group positions forwarded in ref. (d). This is unfortunate because a considerable amount of time and effort was expended by the Owners' Group in establishing positions which were felt to be responsive to the intent of NUREG 0578. In June 1979 the BWR Owners' Group was formed at the request of the NRC in order to more efficiently utilize NRC and industry resources as well as to develop a uniform approach to generic issues. The BWR Owners' Group positions with which the NRC now disagrees have been discussed with members of your staff as early as September 20, 1979. Furthermore preceeding and following the submission of the Owners' Group positions on October 17, 1979, there has been a series of discussions to clarify our positions and the extent to which they satisfy NUREG 0578.

Due to the short time available between the receipt of ref (e) and the date required for this response, the Owners' Group has not been able to establish revised positions for those items which ref. (e) takes exception. JCP&L's revised positions on the four items in this category are:

2.1.2 Safety and Relief Valve Testing

JCP&L still feels that the original BWR Owners' Group position was adequate, however, we will participate in the revision or reinforcement of that position and abide by the requirements which are eventually found acceptable by the NRC. It is unlikely however that the proposed test program will be developed in time for submission to the NRC prior to January 1, 1980.

2.1.3a - Direct Indication of Valve Position

JCP&L still feels that the original BWR Owners' Group position which stated that it is unnecessary to directly measure safety valve position, is valid. However we will participate in the revision or reinforcement of that position and abide by the requirements which are eventually found acceptable by the NRC.

2.1.9 RCS Venting

Since the NRC has found this position acceptable, no revision of our position is necessary.

2.1.9 Containment Water Level Monitor

Since the NRC has found this position acceptable, no revision of our position is necessary.

B. Systematic Evaluation Program (SEP)

JCP&L has been participating in the SEP since its inception in November, 1977. On October 4, 1979, a meeting with all SEP plant representatives was held in your offices to discuss topics which are covered by both SEP and NUREG 0578. It was our understanding that the NRC felt it reasonable to implement portions of certain NUREG 0578 items on an SEP timetable if it required major modifications or additions to ensure that these changes are integrated with any other SEP modifications as a result of the SEP program.

NUREG 0578 items which are in this category for Oyster Creek are:

2.1.4 - Containment Isolation of Nonessential Systems

2.1.6b - Plant Shielding Modifications

2.1.8a - Post Accident Sampling Shielding Modifications

However, during a recent telephone conversation with members of your staff, we were informed that our interpretation of the October 4, 1979 meeting may not be correct and that JCP&L's suggested approach for integrating certain NUREG 0578 and SEP modifications may be unacceptable. Until we fully understand the NRC's concerns it would not be prudent for us to alter our planned course of action and possibly expend manpower in an unproductive way. It is suggested that all SEP plant owners and the NRC meet once again to discuss this subject.

C. Outage Schedule

Oyster Creek is scheduled for its annual refueling outage to begin on January 5, 1980. During the outage, it is JCP&L's intention to implement certain hardware modifications which can be done more efficiently and safely while the plant is shut down. Although NUREG 0578 requires that these items be completed by January 1, 1980, JCP&L feels that plant operations for five (5) days beyond the deadline will result in no adverse consequences. Furthermore, it is nearly impossible to design, procure, install and test modifications in such a short time frame without sacraficing, to some degree, the overall quality of the installation.

The NUREG items, along with their projected status as of January 1, 1980, which are included in this category are:

2.1.3a Direct Indication of Valve Position

The design package is scheduled to be delivered by an outside engineering firm by December 21, 1979. Approval of the Plant Operations Review Committee is expected within two weeks. Once approved, the installation, testing and operating procedures, and training materials will be developed.

By the end of the year all equipment and materials needed for the installation will either be on hand or delivered shortly thereafter. The major components and their estimated delivery dates are:

a) cable - currently available
b) conduit - December 1979
c) sensors - first week of January 1980
d) cabinets - mid February 1980

2.1.4 Diverse Containment Isolation

The design package is scheduled for completion during the last week of December 1979. Approval of the Plant Operations Review Committee is expected within 2 weeks. Once approved, the installation, testing and operating procedures, and training materials will be developed.

The only major components are relays which are scheduled for delivery January 4, 1980.

2.1.6a Leakage Reduction Program

The clarification provided by the NRC in enclosure 1 to ref. (a) indicates that JCP&L's original plans are compatible with the NRC's requirements, i.e. a summary description of our program to reduce leakage from systems outside containment will be provided by January

1, 1980. All practical leak reduction measures will be implemented prior to the end of the outage, and a preventative maintenance program will be initiated to keep leakage to a minimum.

We trust this letter is responsive to your request. If additional clarification is required, please advise.

Very truly yours,

Ivan R. Finfrock, Jr.
Vice President

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