



24 FEB 1982

Docket No. 50-219

MEMORANDUM FOR: Brian K. Grimes, Director, Division of Emergency Preparedness, Office of Inspection and Enforcement

Darrell G. Eisenhut, Director, Division of Licensing, Office of Nuclear Reactor Regulation

FROM: George H. Smith, Director, Division of Emergency Preparedness and Operational Support, Region I

SUBJECT: INSTALLATION OF EQUIPMENT CAPABLE OF SAMPLING REACTOR COOLANT AND CONTAINMENT ATMOSPHERE UNDER POST-ACCIDENT CONDITIONS AT THE OYSTER CREEK NUCLEAR GENERATING STATION

During the Emergency Preparedness Implementation Appraisal of the Oyster Creek Nuclear Generating Station, which was performed from January 4 through January 15, 1982, it was found that the licensee had not installed the equipment which would allow the sampling of reactor coolant and containment atmosphere under post-accident conditions per NUREG-0737. It was further found that the licensee had not taken adequate measures in the interim to evaluate and define the post-accident conditions under which reactor building accessibility for sampling could be expected and had not determined the radiation levels of reactor coolant which could be sampled without exceeding appropriate NRC personnel exposure criteria or EPA action guides. It was also found that the licensee had not completely defined nor procured the equipment necessary to perform the sampling and analyses and had not completely prepared the necessary procedures or trained the personnel in the procedures. The pervasive response of the licensee was that they probably would not be able to obtain any samples under post-accident conditions because of high radiation fields in the reactor building.

The licensee agreed to take some actions for post-accident sampling of reactor coolant and containment atmosphere during the interim before the installation of the proper equipment. These will be documented in a Confirmatory Action Letter, a copy of which will be provided to you. However, the licensee would not provide a completion date for the installation of the subject post-accident sampling equipment, because they had made two applications to the Office of Nuclear Reactor Regulation, for postponement of this installation of sampling equipment.

In a letter from P. R. Clark, Vice President-Nuclear, Jersey Central Power and Light to the Director of the Office of Nuclear Reactor Regulation dated August 27, 1981, the licensee requested that the date for completing NUREG-0737 items II.B.3.2, Post-Accident Sampling, be revised to require the item be completed prior to startup from their Cycle 10 reload refueling/maintenance outage (1982/1983). Then, in another letter from P. R. Clark to the Director of the Office of Nuclear Reactor Regulation dated December 24, 1981, the licensee requested that the commitment date for installation of the post-accident sampling equipment be further postponed until this next major refueling/maintenance outage scheduled for 1984.

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It is our understanding from conversations with J. J. Lombardo, Project Manager, Operating Reactors Branch #5, and D. M. Verrelli, Section Leader, Implementation Section, Operating Reactors Assessment Branch, that the Office of Nuclear Reactor Regulation has not formally replied to the licensee requests. We further understand that the licensee's request for permission to delay the installation of the subject post-accident sampling equipment until their 1982/1983 outage was included with similar requests from other licensees in a paper to be presented to the Commission for their consideration.

It is the Region I position that the licensee should have installed the subject post-accident sampling equipment prior to the January 1, 1982, commitment date for NUREG-0737. Because of the lack of a viable interim post accident sampling scheme we do not consider the postponement of the installation of the subject sampling equipment until 1984 outage to be in the best interest of a sound emergency response posture. Therefore, we strongly recommend that the licensee's request for delay of installation of the equipment until 1984 be denied. Please inform us of your decision in this matter.

Original Signed By:

George H. Smith, Director  
Division of Emergency Preparedness  
and Operational Support, RI

cc:

s. Schwartz DD, EP, IE  
R. Van Niel, EP, IE  
J. Lombardo, LPM, NRR

bcc:

R. Starostecki, DRPI  
R. Keimig, DRPI  
J. Thomas, Resident Inspector  
H. Crocker, DEPOS