

April 25, 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. 50-219/79-05

This is in reply to your letter of April 4, 1979, regarding the inspection conducted by Mr. D. V. Kehoe on February 27 through March 2 and March 5-6, 1979, at the Oyster Creek Nuclear Generating Station. In Appendix A to your letter, there is noted one activity which was not conducted in full compliance with the Oyster Creek NRC Facility License. The item of noncompliance cited, a deficiency, is restated below:

Deficiency - 10 CFR 50, Appendix B, Criterion XIII, states, in part, "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of materials and equipment...to prevent damage or deterioration."

JCP&L Operational Quality Assurance Plan requires that procedures be developed, approved, and implemented to control the handling, storage, shipping, cleaning and preservation of materials and equipment using the guidance provided by Regulatory Guide 1.38 and ANSI N45.2.2. Oyster Creek Nuclear Generating Station Administrative Procedures No. 110, Handling and Storage, No. 117, Identification and Control, and No. 121, Storeroom Instructions provide the station instructions for implementing the above related requirements.

Contrary to the above, the following examples of noncompliance were observed by the inspectors during a tour of the QA storeroom.

Response - The specific examples of the noncompliance identified and the immediate corrective action taken for each are as follows:

1. A surge guard pulsation reducer and a Powell ball valve with pipe nipples were found stored on a QA shelf with no identification.

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Corrective Action - The above items and all other items stored in the QA storeroom have been identified. All material which was determined to be non-QA as a result of this identification, has been removed from the QA storeroom.

2. QA weld rod was found stored with non-QA weld rod and weld rod with no identification.

Corrective Action - All non-QA weld rod has been removed from the QA storeroom. All weld rod without identification has either been identified or destroyed.

3. Hazardous material was found stored in close proximity to QA items in a room with no ventilation.

Corrective Action - All hazardous material is now being stored in a fireproof locker approved for such storage by the Oyster Creek Nuclear Station Fire Protection Specialist.

4. Boxes of material were found not stored on pallets or shoring as required by Procedure 110, paragraph 5.2. Also, boxes were stacked to a height that caused deformation of lower boxes and the potential damage to box internals.

Corrective Action - All materials are now being stored on pallets or shoring as required. The overstacked boxes have been reinspected and no damage found.

5. An open soft drink can was found in the QA storage area.

Corrective Action - The soft drink can has been removed from the QA storeroom. All assigned personnel were briefed as to the requirements for storage and use of food and drink in QA storage areas.

6. No means existed by which classification of individual items, with regard to storage level requirements, could be determined.

Corrective Action - All items in storage have been classified and marked as to level of storage required for that item.

7. The storage level of the QA storeroom was not identified.

Corrective Action - Signs have been posted at accesses to the QA storeroom which designate level of storage allowed.

8. The outside QA storage area was not identified.

Corrective Action - An outside storage area (level "D" storage) has been located and marked as such. All level "D" material is in this area.

9. Valves and pipes, which were annotated "Released for Use" were found with open ends; i.e., not plugged, sealed or capped.

Corrective Action - To date, 80% of the open ended pipes, valves, etc., have been covered. Upon receipt of additional materials, this task will be completed.

The following steps have been taken in an effort to prevent such noncompliances from occurring in the future.

1. The Oyster Creek Stores Supervisor has been replaced with a new supervisor who is more knowledgeable in the requirements of QA warehousing.
2. A complete cleanup of the QA storeroom has been completed to bring cleanliness up to required standards and to provide improved working conditions. The need for continued attention to cleanliness has been stressed to all assigned personnel.
3. All assigned personnel have been briefed as to the special requirements for QASL warehousing.
4. Senior plant stockkeepers are now responsible for maintaining conditions in the QA storeroom up to standards.
5. The Stores Supervisor performs informal daily tours and weekly inspections to augment the formal monthly inspection and to ensure compliance with all applicable procedures.

Three projects are now underway or will be implemented in the near future to bring the QA storeroom to full compliance with all applicable requirements. These are:

1. A new warehouse is being constructed at this time. This warehouse will relieve the storage problems we now experience.
2. While construction is underway, all applicable storeroom instructions are being reviewed and revised. This task will be completed before the warehousing operation is moved to the new location.
3. A formal training program will be implemented to ensure that all personnel assigned are aware of all requirements for warehousing of QA material.

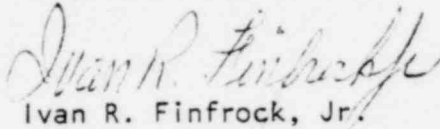
It is expected that all activities in connection with the above projects will be completed by March 30, 1980.

With regard to the unresolved item (219/79-05-04) discussed in Detail 4.c.(2) of the inspection report, JCP&L interprets its commitment to be one of checking all drawings (including the drawings being maintained

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by individual operating personnel) in the Control Room and either validating them as the latest approved drawing, overmarking them as superseded, or removing them from the Control Room by April 1, 1979. This effort has been completed. Any outdated drawings maintained by individual operating personnel which remain in the Control Room and which are not the latest approved revision, have been marked "Superseded, For Information Only". If this is not consistent with your understanding of our commitment, please contact us for resolution.

Very truly yours,


Ivan R. Finfrock, Jr.
Vice President

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