APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation
Oyster Creek Nuclear Generating Station

Docket No. 50-219
License No. DPR-16

As a result of the inspection conducted on August 14, 1989, through September 15, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, (Enforcement Policy) (1989), the following violations were identified:

A. 10CFR 50, Paragraph 50.71(e) states that the updated FSAR shall be revised to include the effects of: all changes made to the facility or procedures as described in the FSAR; all safety evaluations performed by the licensee either in support of requested licensee amendments or in support of conclusions that changes did not involve an unreviewed safety question. Subsequent revisions shall be filed no less frequently than annually and shall reflect all changes up to a maximum of six months prior to the date of filing.

   Contrary to the above, the licensee has not updated the FSAR in a timely manner to reflect emergency service water system and containment spray system design bases alignment, operation, and analyses. For example, errors were noted in subsections 6.2.2.1, 6.2.2.4, 6.2.2.3.1 and Tables 6.2-3 and 6.2-14.

   This is a Severity Level V Violation.

B. Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained. Contrary to this requirement, the following examples were identified in which procedures were not effectively implemented.

   1. Station Procedure 107, Procedure Control, Revision 35, Step 5.1.5.7 states, supervisory personnel are responsible for ensuring that personnel understand procedures being used including the objectives and desired results to be achieved by following those procedures.

      Contrary to the above, a significant temporary change was made to Station Procedure 312.1, Bypassing Isolation Interlocks and Automatic Scram During Emergency Conditions. This change altered the way containment spray system logics would be bypassed. Operators had been specifically trained on the existing method of bypassing these logics. The change was instituted without operating personnel being made aware of the change. In addition the change was not properly posted in the affected procedure, and the no longer required bypass jumpers were not retrieved from the emergency locker.

2. Station Procedure 607.4.005, Containment Spray and Emergency Service Water Pump System 2 Operability and Inservice Test, Revision 0, Step 6.6 provides instructions for containment spray pumps lubrication. Step 6.6.1.6 states, if grease cup is depleted then add grease to the cup using lubricant specified in 6.6.1.

   Contrary to the above, during the performance of this surveillance on August 16, 1989, grease cups on the system 2 containment spray pumps were found depleted and grease had not been added during the previous surveillance.

3. Station Procedure 125.1, In Service Test Program Administration, Revision 5, provides direction to personnel for the administration and implementation of the In Service Testing Program. Step 4.2.1.a, IST Procedures/Standards, states in part, where Section XI cannot be complied with it shall be documented in the IST Program with appropriate NRC relief requested as provided by 10CFR 50.55a(g).

   Contrary to the above, for the emergency service water pumps the pump differential pressure, a test quantity, the Section XI required upper and lower alert range limits have been deleted and the upper action limit increased without appropriate NRC relief requested.

   This is a Severity Level IV Violation.

C. 10CFR 50, Appendix B, Criterion VIII requires that measures be established to assure that identification of components is maintained and that control measures prevent the use of incorrect or defective parts or components. The licensee purchased containment spray system heat exchanger relief valves to meet ASME Section VIII. Paragraphs VG-129 and 136 of that code require nameplates and lockwires on these components.

   Contrary to the above, as of August 16, 1989, the measures for identification and control of the heat exchanger relief valves were inadequate in that the nameplates and lockwires required by ASME Section VIII were not maintained.

   This is a Severity Level IV Violation.

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation, Oyster Creek Nuclear Generating Station is hereby requested to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.