

Nuclear

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November 10, 1989

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
DPR-16
Generic Letter 89-04

By letter dated October 3, 1989, GPU Nuclear responded as required to Generic Letter 89-04 "Guidance on Developing Acceptable Inservice Testing Programs". At the request of the USNRC, a conference call was held on October 12, 1989 to clarify and expand upon the GPUN response. This letter is being written to document the results of the October 12, 1989 conversation.

The NRC questioned why the October 3, 1989 response primarily described the status of on-going work in the Inservice Testing (IST) review, and was not more finalized in content. GPUN answered that the present review was performed by comparing the requirements of GL 89-04 with the existing IST program (ASME XI, 1974 edition with summer 1975 addenda), and with the requirements of the code which is presently anticipated to be effective for the 10 year update (OM6 and OM10). Application of these new requirements may change the scope of the IST program both in number of components and testing requirements. As the review of systems, components and requirements continues, differences are being identified between the program written to the original code and the new version of the code. Additional components have been identified which were not within the scope of the existing program, but needed to be included for Generic Letter 89-04 considerations. This necessitated the development of new procedures and caused scheduling changes. Other components which are presently in the IST program would be deleted or subject to different test criteria per the new Code edition. Therefore, hardware modifications performed solely for the purpose of complying with the intent of GL 89-04 are unwarranted in that some of these modifications would be unnecessary to comply with the 10 year update.

As described in the GPUN submittal of October 3, 1989 and restated during the October 12, 1989 conference call, GPUN has integrated the Generic Letter response into the 10 year update, thereby providing a continually improving program. The intent of the October 3, 1989 letter was not to finalize the results of the reviews but rather to provide the NRC with: 1) the status of work accomplished; and 2) the schedule for work remaining.

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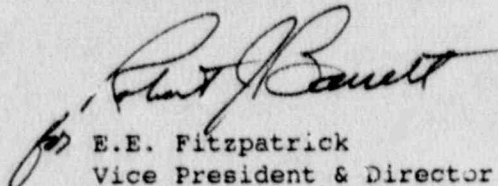
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On December 2, 1985, the NRC issued its safety evaluation of the IST Program, Rev. 4. GPUN addressed the NRC concerns in the safety evaluation and submitted Rev. 5 as requested by the NRC. As a result of the changes to the program required by the Generic Letter and preparation for the 10 year update, the existing testing may not be performed in full conformance with the present IST program. Therefore, GPUN committed during the conference call to submitting Revision 6 to the IST program by August 3, 1990. Revision 6 will include those procedural and scope changes required to comply with GL 89-04, except for those changes which may require hardware modifications. Plans modifications determined to be required for either the Generic Letter 89-04 requirements or next 10 year update will be addressed in the 10 year update submittal.

Finally, the NRC noted that as procedures are rewritten to meet new requirements, they may temporarily conflict with existing requirements. GPUN concurred, but stated that the evolutionary nature of major programmatic upgrades always results in an interim period when previous requirements and future requirements conflict. GPUN will continue to revise its procedures to comply with the GL 89-04 requirements and the ASME Code requirements of our next 10 year update. Although this may result in a procedure which does not fully comply with the existing IST program at any given point in time, the overall effect of the upgrade to newer Code requirements will result in a continually improving program.

If any further information is required, please contact Mr. John Rogers at 609-971-4893.

Very truly yours,


E.E. Fitzpatrick
Vice President & Director
Oyster Creek

EEF/JR/jc
(11-12)

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