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September 26, 1980

Mr. Darrell G. Eisenhut
Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Subject: TMI2 Related Requirements for Operating
Reactors (NUREG 0660)
Oyster Creek Nuclear Generating Station
Docket No. 50-219

In response to your letter dated September 5, 1980, JCP&L has reviewed all of Oyster Creek's TMI lessons learned activities against the clarified requirements of that letter. As a result of that review, we are requesting that the implementation date of some items be extended.

Attachment A and B to this letter provide alternative schedules and justification for two items: 11.K.3.14, Isolation of the Isolation Condensers on High Radiation in Vent and 11.K.3.27, Common Reference Level for Vessel Level Instrumentation. Our position on these two items was originally addressed in our June 23, 1980 letter written in response to your May 7, 1980 letter.

As so, since a plant shutdown would be required to complete item 11.K.3.19, Interlock on Recirculation Pump Loop, we would propose completing that item during a Spring 1981 shutdown scheduled for the purpose of completing other action plan items. We feel this is justified since JCP&L has already implemented comprehensive administrative controls to assure at least two recirculation loops are open at all times. These administrative controls include: establishing this as a Safety Limit in Oyster Creek's Technical Specifications, procedure changes, hinged covers over all recirculation loop isolation valves and conspicuous warning signs on each cover.

Further, the Federal Environmental Protection Agency's National Pollution Discharge Permit for Oyster Creek, prohibits in Section 9.b.5, planned shutdowns during December through March. This leaves a very brief period for planning and preparation for the modification, including provisions for adequate ALARA review.

We also feel that a shutdown before January 1981 would not facilitate the completion of other items, but would in fact divert resources from the items that are required to be completed by January 1, 1981.

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Mr. Darrell G. Eisenhut

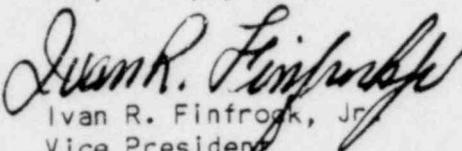
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JCP&L cannot yet commit to completing the revised requirements of item II.E.4.2.3, Containment Isolation Dependability, until we have had a chance to review the additional NRC guidance on requirements for three (3) diverse isolation signals and essential vs. nonessential systems.

If you should have any questions regarding the response, please contact Mr. James Knubel (201-455-8753) of my staff.

Very truly yours,


Ivan R. Finfrock, Jr.
Vice President

ATTACHMENT A

ISOLATION OF THE ISOLATION CONDENSERS ON HIGH RADIATION IN VENT (NUREG 0660, II K.3.14)

NRC REQUIREMENT

Modify the isolation condenser logic so that the isolation condensers are isolated from the reactor upon the receipt of a high radiation signal in the atmospheric vent monitor instead of the steam line monitor. The goal of this modification is to increase the availability of the isolation condensers during an accident by isolating them only if there is radiation being released from the plant through the shell side vents to the atmosphere. Such a release could only occur if there were a tube leak. Modifications should be complete by January 1, 1981.

OYSTER CREEK'S PRESENT DESIGN

The isolation condenser isolation logic is somewhat different from that described for the typical BWR. A vent line radiation monitor does exist which alarms in the control room, however Oyster Creek does not have a steam line radiation monitor which is used to isolate the reactor from the condensers.

OYSTER CREEK POSITION

JCP&L agrees with the NRC's goals of increasing the availability of the isolation condensers, post accident. They are passive systems and are well suited for long term core cooling. JCP&L's concern is that if this modification is not properly designed, it will have an adverse effect on availability. To do this job properly we cannot simply rewire the existing vent line radiation monitor alarm into the isolation circuit. In our judgement, the existing monitor would alarm, even if there were no tube failure simply because of the extremely high radiation levels expected in the area of the monitors from the isolated condenser's steam & condensate piping. Furthermore, it is impractical to shield the present detectors sufficiently to ensure that their alarming implies a tube rupture.

JCP&L feels that a modification to this system which achieves the desired results cannot be completed by January 1, 1981. At this time the required radiation monitoring scheme has not been specified and obviously the procurement lead times are unknown. We propose to submit a design for this modification by January 1, 1981 and at that time will also include an implementation schedule based upon vendor supplied delivery dates.

ATTACHMENT B

COMMON REFERENCE LEVEL FOR VESSEL LEVEL INSTRUMENTATION (NUREG 0660, II. K.3.27)

NRC REQUIREMENT

Modify all reactor vessel water level instrumentation so that they have a common reference level. Complete by January 1, 1981.

OYSTER CREEK'S POSITION

In general we agree with the concept of having a common reference level for all reactor vessel level instrumentation. Most persons not involved with control room operations find the present system of level instrumentation cumbersome and difficult to comprehend. Control room operators and shift supervisors who have been working with the present system for a number of years, however, are quite comfortable with it and adept at using it. JCP&L is concerned that an abrupt change from the present system may have a confusing effect and consequently be the cause of operational problems. In addition, a substantial administrative task is associated with this alteration. Relabeling the faces of the indicators and recorders is relatively simple compared to the task of identifying and revising all logs and operations, emergency and surveillance procedures which use the present system of level instrumentation.

JCP&L proposes the following alternate schedule. By October, 1980, all level indicators and recorders will have their faces altered showing two scales. One will be the present markings and the other will be referenced to the top of the active fuel. We will also identify all documents (e.g. logs and procedures) which will need to be revised as a result of changing the reference point. The period between October 1980 and the 1981 refueling outage will be a transition period during which the operators will become accustomed to the new scales and changes to all documentation will be drafted. The elimination of the old scales and changes to all affected procedures, logs, etc will occur during the 1981 outage. It is felt that an outage period is the best time for this transition because level instrumentation in the normal operating ranges is not used and therefore the opportunities for operator misjudgement are minimized. The spring outage will also provide a block of time during which the required training sessions can be conducted.