OYSTER CREEK **NUCLEAR GENERATING STATION**

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February 26, 1981

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Grier:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report No. 50-219/80-30

This letter is in response to your letter of January 30, 1981 regarding the findings of the inspection by Mr. T. Jackson on September 22-26 and October 15, 1980.

Enclosed as Attachment A are responses to each item of alleged noncompliance. If there are any questions regarding the enclosed information or additional information is required, please contact me.

Very truly yours,

Ivan R. Finfrock, Jr.
Vice President

cc. Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, New Jersey 08731

Attachment A

Response to Inspection #50-219/80-30

The following information provides a response to the Infractions and Deficiency noted in the Notice of Violation contained in the USNRC letter dated 30 January 1981 regarding Inspection No. 50-219/80-30.

A. Infraction

Section 5.5.1 of the Oyster Creek Environmental Technical Specifications (OCETS) requires, in part, that detailed written procedures, including applicable checklists and instructions, be prepared and adhered to for all activities involved in carrying out the OCETS.

Section 5.3 of the OCETS requires, in part, that audits and reviews will be performed as required, and in no case less than yearly.

Section 5.5 of QA Procedure No. 4008, Revision 5, "Requirements for the Operational QA Audit Program", dated May 22, 1978, requires, in part, that responses be made to audit "findings" within 30 days of the issue of audit reports and that responses be made to audit "observations" within six months of the issuance of audit reports.

Contrary to these requirements, as of September 26, 1980, the appropriate licensee organization have not yet responded to any of the nine "findings" or six "observations" described in the licensee's Audit Report ISRG Audit No. 79-20 - Chemistry, Environmental and Radiological Environmental Monitoring, issued on January 25, 1980, which is a period of eight months.

Response

The foregoing statement is correct and was identified in licensee's ISRG Audit 80-09 which was independent of the NRC's audit.

Corrective steps which have been taken

Responses have been made for all findings and observations of Audit No. 79-20.

Corrective steps which will be taken to avoid further items of non-compliance

The Oyster Creek Environmental Controls Dept. has been established and is adequately staffed to handle such matters in the future.

Date of full compliance

January 1981

B. Infraction

Section 5.5.1 of the OCETS requires that detailed written procedures, including applicable check lists and instructions, be prepared and adhered to for all activities involved in carrying out the OCETS, and that procedures shall include sampling, data recording and storage, instrument calibration, measurements, analyses, and actions to be taken when limits are approached or exceeded.

(1) Sections 2.1.1, 2.1.2, 2.1.3, 2.1.4 and 2.1.5 of the OCETS require, in part, that in the event that the temperature monitoring system is inoperative during Station operation, intake and discharge temperatures (at approximately the same locations and depths) shall be monitored at various frequencies depending upon plant conditions. This monitoring shall utilize local reading instrumentation and shall be performed until the temperature monitoring system is returned to service.

Contrary to these requirements, as of September 26, 1980, detailed procedures were not prepared which contained provisions for actions to be taken in the event that the temperature monitoring system was inoperable, including instructions for accomplishing manual measurements as required.

(2) Section 2.1.4 of the OCETS specifies those intake and discharge temperature conditions during which the Station dilution pumps are required to be operated.

Contrary to the above requirements, as of September 26, 1980, Procedure No. 324, Rev. 4, "Thermal Dilution Pumps," dated March 18, 1980, or other procedures did not contain provisions to insure the operation of the dilution pumps as required by OCETS during plant start-up when discharge temperatures are changing. This failure resulted in a violation of the OCETS on July 29, 1980.

(3) Section 3.3 of the OCETS specifies that the onsite meteorological monitoring program shall conform to Regulatory Guide 1.23, "Onsite Meteorological Programs" (February 1972).

Contrary to these requirements, detailed written procedures were not prepared for the calibration of the control room meteorological monitoring recorders.

Response

The foregoing statement is correct.

Corrective steps which have been taken

Regarding point 1, a procedure was drafted in early 1980 to provide instructions for actions to be taken in the event the temperature monitoring system is inoperable although this procedure does not fully respond to the NRC's request.

Regarding point 2, procedure no. 324, Rev. 4 has been revised, although this procedure was not the one referenced in NEOR 80-2.

Regarding point 3, no corrective steps have been taken as of 19 February 1981.

Corrective steps will be taken to avoid further items of noncompliance

Regarding point 1, a revision will be made to the associated procedure to provide specific directions to personnel to accomplish manual temperature measurements.

Regarding point 2, a 200 series procedure will be revised to incorporate a dilution pump start-up sequence.

Regarding point 3, a 1200 series procedure will be prepared.

Date of full compliance

30 May 1981

C. Infraction

Section 3.3 of the OCETS requires that the onsite meteorological monitoring program shall conform to Regulatory Guide 1.23, "Onsite Meteorological Programs" (February 1972).

(1) Section C.4.a of Regulatory Guide 1.23 specifies that wind direction accuracy for instantaneous recorded values be ±5°.

Contrary to these requirements, as of September 26, 1980, the wind direction sensors were calibrated to a reference point at 140° which had been shown by a November 1978 survey to actually be located at 147° relative to the meteorological tower, thereby introducing a systematic bias of -7° into the calibration and the subsequent wind direction data.

(2) Section C.5 of Regulatory Guide 1.23 specifies that meteorological instruments should be calibrated at least semiannually.

Contrary to these requirements, control room meteorological monitoring recorders were not calibrated on a regular, semiannual basis.

Response

The foregoing statement is correct.

Corrective steps which have been taken

Regarding point 1, the wind direction sensor was correctly calibrated on 16 October 1980.

Regarding point 2, the control room meteorological monitoring recorders were calibrated on 15 October 1980.

Corrective steps which will be taken to avoid further items of noncompliance

All calibrations will be performed per OCETS.

Date of Full Compliance

October 1980.

D. Infraction

Seccions 2.1.1, 2.1.2, 2.1.3, 2.1.4, and 2.1.5 of the OCETS require, in part, that the various parts of the plant thermal monitoring system instrumentation be subjected to a channel check weekly and calibrated monthly.

Contrary to these requirements the thermal monitoring system was not subjected to a channel check between June 6 and November 20, 1979, nor to a calibration between June 6 and October 5, 1979.

Response

The foregoing statement is correct.

Corrective steps which have been taken

Necessary channel checks and calibrations of the thermal monitoring system have been made since 20 November 1979 and 5 October 1979 respectively.

Corrective steps which will be taken to avoid further items of noncompliance

Necessary channel checks and calibrations will be made.

Date of Full Compliance

November 1979.

E. Deficiency

Sections 2.1.1, 2.1.2, 2.1.3, 2.1.4, and 2.1.5 of the OCETS require, in part, that redundant sensors at the intake, discharge, and the Route 9 bridge shall be employed to protect against loss of a sensor, and that the thermal monitoring instrumentation shall possess an overall system accuracy of $\pm$0.55°C ($\pm$1.0°F).

Contrary to these requirements, as of October 15, 1980, only one of the redundant sensors in place at each of the three locations was included in the system which satisfied the accuracy requirements of the OCETS.

Response

The foregoing statement is correct and was reported in NEOR No. 79-2 dated August 10, 1979.

Corrective steps which have been taken

A new temperature monitoring system has been designed and component procurement has begun.

Corrective steps which will be taken to avoid further items of noncompliance

Construction will begin in March 1981. Operation will commence in April 1981. The new system's installation will prevent recurrence of noncompliance.

Date of Full Compliance

30 June 1981

F. Other Items

Air Samplers

One activity appears to be a deviation from accepted industry practice. With respect to your program for environmental air sampling, the construction of the sample inlet deviates from

the recommendations of ANSI N13.1-1969 such that it could adversely affect the representativeness of the sample collected, as discussed in Detail 5.a of the enclosed Inspection Report.

Response

The air samplers inlet lines will be modified to eliminate the bend. This will be done by July 1981.

G. Dilution pumps

The Inspection Report also discusses continuing problems encountered in the operation of the plant dilution pumps. Please describe your long-term plans for ensuring the continued operability of the plant dilution pumps.

Response

An evaluation of the feasibility of undertaking long-term plans for improving operability of the plant dilution pumps will be complete by 31 May 1981. The NRC will be notified of the result of the evaluation by 30 June 1981.