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January 15, 1990

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

Dear Sirs:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Response to Inspection Report 89-21
Notice of Violation

In accordance with 10CFR2.201, the attachment provides GPUN's response to the violation identified in the subject Inspection Report. The initial 30 day response date was discussed with the NRC resident inspector at Oyster Creek and an extension was granted to 1/15/90.

If you have any questions regarding this submittal, please contact Kathy Barnes at 609-971-4390.

Very truly yours,

E.E. Fitzpatrick
Vice President & Director
Oyster Creek Nuclear Generating Station

EEF/KB:jc
(IR89-21)

cc: Mr. William T. Russell, Administrator
Region 1
U.S. Nuclear Regulatory Commission
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NRC Resident Inspector
Oyster Creek Nuclear Generating Station

Mr. Alexander Dromerick
U.S. Nuclear Regulatory Commission
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Attachment

Violation:

During an inspection conducted September 3 - October 7, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" 10 CFR Part 2, Appendix C, 53 Fed. Reg. 40019 (October 13, 1988), the following violation was identified:

10CFR, Part 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of the type appropriate to circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Oyster Creek Operational Quality Assurance Plan, Section 6.11 requires that maintenance shall be preplanned and performed in accordance with written procedures, instructions or drawings appropriate to the circumstances which conform to applicable code standards, specifications and criteria.

Contrary to the above:

1. On or before 12/14/88, #1 emergency diesel generator relay contact resistances were measured, complex maintenance and post maintenance testing were performed under job orders 12108 and 13489, and,
2. On 9/14/89 the #1 emergency diesel generator starter motor was removed, without these activities affecting quality being preplanned or prescribed by written instructions, procedures or drawings of a type appropriate to the circumstances.

Response:

GPUN concurs with the violation as stated.

1. Corrective steps which have been taken and the results achieved:

Upon identification of the more recent deficiency (9/14/89), the work on the Emergency Diesel Generator was stopped. The Immediate Maintenance Work Request was closed and a new job order was written and processed, in accordance with procedures, before work continued.

2. Corrective steps which will be taken to avoid further violations:

The supervisor responsible for the work activities was instructed on the requirements of Oyster Creek Procedure 105 "Control of Maintenance". A staff meeting was held with all electrical department supervision discussing the procedural requirements with regard to immediate maintenance.

Procedure A000-WMS-1220.08 "MCF Job Order" is being revised to provide detailed guidance for performance of immediate maintenance. Until the revision is approved for use, all immediate maintenance job orders are being planned using an interim control document consisting of a job sequence attachment to the job order.

3. The date when full compliance will be achieved:

Full compliance will be achieved upon issuance of the revised procedure prior to January 30, 1990