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Department of Environmental Protection
John V. Czapor
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October 31, 1989

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Murley:

The purpose of this letter is to initiate a discussion between the Department of Environmental Protection (DEP) and the U.S. Nuclear Regulatory Commission (NRC) about the issuance of a Full Term Operating License (FTOL) for the Oyster Creek Nuclear Generating Station (OCNGS). We have both safety related and environmental concerns that we would like to discuss with you prior to the Commission's formal consideration of the FTOL.

In general, we feel that Oyster Creek stands out as a unique nuclear power plant among the population of nuclear plants operating today. Moreover, when that uniqueness is evaluated within the context of the extended period that the plant has operated with a Provisional Operating License (POL), they collectively suggest that consideration of a FTOL at this late date in the life of the plant should include those special considerations as part of the standard licensing process and safety evaluation.

Over the years, the DEP managers and staff have expressed their concerns to the NRC and the licensee about specific safety related issues that the operation and regulation of Oyster Creek have presented. Those concerns have encompassed both particular license amendments and other issues that were reflective of plant operations, management and maintenance. The individual issues have been presented by our staff in a variety of ways with little in the way of tangible results and have, therefore, accrued and coalesced into one basis for our concern today.

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In addition, the Integrated Plant Safety Assessment Review (IPSAR) and Safety Evaluation Report (SER) for the OCNGS do not, in our opinion, adequately characterize the site-specific nature of the OCNGS as it exists today and does not provide a complete safety related basis for consideration of the FTOL. Therefore, I have attached a brief outline of the broad issues we would like to discuss with you and for possible incorporation into the FTOL licensing evaluation process and issuance determination.

In conclusion, I would like to extend an invitation to you and your staff to discuss the OCNGS FTOL review process with us in the near future at my office. This first meeting could provide an opportunity to identify issues for which we have mutual concern and to develop a mechanism for their resolution prior to the issuance of an FTOL. It would also serve as a template for future meetings on the remaining unresolved issues. I look forward to your reply.

Sincerely,

Original Signed By
JOHN V. CZAPOR

John V. Czapor
Acting Assistant Commissioner

c: **Kenneth M. Carr, Chairman, NRC**
Forrest J. Remick, Chairman, ACRS
William T. Russell, Regional Administrator, NRC Region I
Philip C. Clark, President, GPUN
Christine T. Whitman, President, NJBPU

OYSTER CREEK NUCLEAR GENERATING STATION (OCNGS)
FULL TERM OPERATING LICENSE (FTOL)

1. Opportunities for Public Participation in the FTOL Process.
2. The Individual Plant Examination (IPE) Process as Outlined in the Nuclear Regulatory Commission's (NRC) Generic Letter 88-02 in November 1988.
3. Boiling Water Reactor Mark I Containment Modifications as Outlined by the NRC Staff to the Commission in January 1989 and in a Commission Policy Statement in July 1989.
4. The OCNGS Emergency Core Cooling Systems.
5. Plant Aging and Life Extension.
6. The NRC Licensing Review and Compliance Process as Reflected in their Systematic Evaluation Plan (SEP), Integrated Plant Safety Assessment Report (IPSAR) Reviews for OCNGS.
7. The NRC Safety Evaluation Report (SER) for OCNGS.
8. The OCNGS Effluent Radiation Monitoring System Reliability.
9. NRC Environmental Assessment for the FTOL - April 1986.
10. Nuclear Emergency Response Planning and Response for the OCNGS.