



GPU Nuclear
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Writer's Direct Dial Number:

September 1, 1983

Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Crutchfield:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
0737 Item II.K.3.18

Your letter dated June 3, 1983 requested that we select one of two options for modifying our facility and provide you with an implementation schedule.

In our letter dated January 7, 1983 we endorsed the BWR Owners Group (BWROG), supporting our position that no modification to the Automatic Depressurization System (ADS) logic was required.

In reviewing Enclosure 1 to your June 3 letter, it appears that the selection of two acceptable modifications by the NRC staff was influenced by the lack of a reliability and risk assessment in the BWROG study.

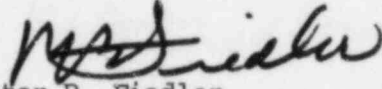
Before committing to any modifications to the ADS logic, it is our intention to perform a plant specific risk assessment. That assessment will be completed by November 15, 1983 and we will notify you at that time of the results. Our approach will be to calculate the risk with the plant in the current configuration by events in which ADS actuation is required, but would not occur due to the absence of high drywell pressure. If the risk is sufficiently small (compared to the NRC Safety Goals), no modification will be made. If the risk appears to be significant, we will calculate the risk reduction achievable by the proposed modifications. We will also consider any increased risk due to the modifications. If the net risk reduction can be achieved in a cost beneficial manner (based on the Safety Goal criteria), a modification will be scheduled to be performed consistent with its safety significance.

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If you have any questions on this matter, please contact Mr. J. Knubel
(201) 299-2264) of my staff.

Very truly yours,



Peter B. Fiedler
Vice President and Director
Oyster Creek

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cc: Administrator
Region I
U.S. Nuclear Regulatory Commission
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NRC Resident Inspector
Oyster Creek Nuclear Generating Station
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