

50-219



Jersey Central Power & Light Company  
Madison Avenue at Punchbowl Road  
Morristown New Jersey 07960  
201 539-6111

October 30, 1981

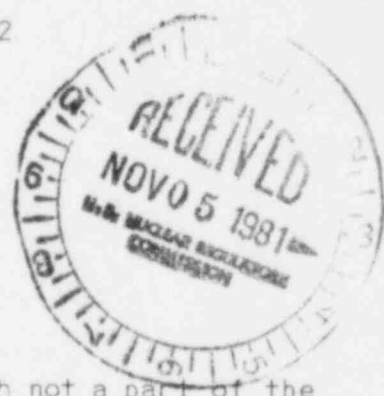
Harold R. Denton  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Denton:

Subject: Oyster Creek Nuclear Generating Station,  
Systematic Evaluation Program

The purpose of this letter is to present JCP&L's responses to and comments on the NRC's plans and schedule for completion of the Systematic Evaluation Program (SEP). These plans were described in discussions between NRC and JCP&L representatives at Oyster Creek on September 17, 1981. The NRC's draft schedule for completion of the SEP (NUREG-0485 dated July 31, 1981) was also given to us at the September 17th meeting. Based on these discussions and the NRC's draft schedule, it is our understanding that the main steps and schedule planned for completing the Oyster Creek Safety Evaluation Report (SER) on the SEP are as follows:

- Complete integrated assessment by the Staff and issue the draft SER for internal NRC review  
January, 1982
- Issue NRC's draft SER to licensee and ACRS  
March, 1982
- Commission review meeting with Staff and licensee  
May, 1982
- Issue final SER  
June, 1982



It is also our understanding that the licensee, although not a part of the Staff team which performs the integrated assessment and prepares the draft SER, will be made aware of those deviations to current regulatory criteria which the Staff considers significant and which therefore may require plant and/or procedural back-fits during the progress of the integrated assessment.

As we discussed during our recent meeting, we do not agree with the manner in which the reviews of the SER have been scheduled without an appropriate period for Owner review and response to the draft SER prior to ACRS and Commission review. The basic reason for our concern is twofold: (1) we believe

A035  
s  
1/0

8111060434 811030  
PDR ADDCK 05000219  
PDR

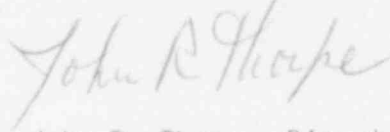
accuracy would be improved by Licensee/staff review prior to submission to ACRS and Commission and (2) we think that it is not possible for the staff to be adequately knowledgeable in all factors which we understand will be incorporated in any backfit decision. According to the NRC's present plans, these judgements are to be based on such factors as safety significance, practicality and cost of implementing plant modifications, personnel radiation exposure involved, plant downtime required, and other factors. Based on our experience, the licensee has unique capability including plant unique knowledge, to make these comparative evaluations. As a result, it is likely that the ACRS and Commission will be presented with a set of SER's which are based on incorrect assessments of the feasibility, radiation exposure and cost of implementation.

The alternative to this approach (and one which the SEP Owners understood from earlier discussions with the Staff would be utilized) is to provide a suitable period of time, after issuance of the draft SER and prior to ACRS and Commission review, for review of the NRC findings by the licensee, and resolution of differences between the Staff and the licensee. We believe that the period required for this review and licensee/Staff interaction is a minimum of six months. Considering that the SER for SEP represents the culmination of over four years work on the part of both the Staff and the licensee, this amount of time is considered reasonable. In contrast, the present NRC approach in which the licensee is expected to review and agree on the need for identified candidates for back-fits in parallel with ACRS and Commission review, does not provide the time for careful and systematic consideration by the plant owner of the real impact of such back-fits. Similarly, it is not realistic to expect the licensee to perform these evaluations during the progress of the NRC's integrated assessment on a piece-meal basis. It is our belief that to undertake ACRS and Commission review prior to agreement on the draft SER conclusions will result in unnecessary confusion and prolong the review process. In addition, the schedule in NUREG 0485 for the completion of the Integrated Assessment appears to be overly optimistic. We do not have the dedicated resources necessary to support this program as well as all other regulatory required programs (i.e., TMI Action Plan - NUREG 0737, Emergency Planning, Environmental Qualification of Electrical Equipment etc). We believe that, based on the past experience, the schedule for integrated assessment given in the NUREG is too ambitious even for the NRC staff to accomplish.

Based on the above, JCP&L requests that the NRC revise their plans and schedule for completion of the draft Oyster Creek SER for the SEP by providing more time for the Integrated Assessment and by adding a 6-month licensee review and evaluation period prior to ACRS and Commission review.

We will be pleased to discuss this with you in more detail at your convenience.

Very truly yours,



John R. Thorpe, Director  
Licensing & Regulatory Affairs