



GPU Nuclear Corporation  
Oyster Creek Nuclear Generating Station  
Route 9  
Forked River, New Jersey 08731  
609-971-4814

John J. Barton  
Vice President and Director  
Oyster Creek

February 5, 1993  
C321-93-2047

Mr. Thomas T. Martin, Administrator  
Region 1  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
January 25, 1993 Degraded Shut down Cooling Event

On January 25, 1993, an event resulting in degraded shutdown cooling occurred at Oyster Creek. This event was caused by an inadequate change to the shutdown cooling procedure. As a result of reduced cooling effectiveness, coolant temperature exceeded the technical specification limit for the plant condition at the time. In response to this event, we have initiated a thorough review of the circumstances to determine cause, significance and corrective actions. In addition, the NRC assigned an Augmented Inspection Team to investigate this event.

Three separate GPU Nuclear review groups are evaluating this event. Corrective actions resulting from these reviews are both short and long-term actions depending upon the specific areas they address. One of the areas that has been carefully looked at is the review process conducted for procedure changes.

The review process for procedure changes at Oyster Creek was established to ensure the adequacy of proposed changes. A temporary change process is in place to facilitate immediate changes to procedures when circumstances warrant such a change. Currently, our procedure allows a more limited review for temporary changes than the normal procedure change process. This temporary change process was utilized to effect the change to the shutdown cooling procedure which resulted in degraded cooling. While we believe that the primary cause of the inadequate change is an implementation failure, we are concerned that the reduced level of review the temporary change process allows may have resulted in excessive reliance on its use. As a result of our in-house review and discussions, we have concluded that this process should be strengthened.

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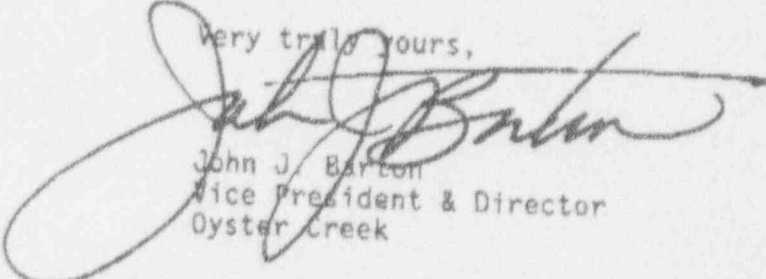
The temporary procedure change process currently requires two management approvals but does not require a thorough technical review unless a safety evaluation is required. In order to assure a thorough technical review of substantive temporary changes we will now perform a Responsible Technical Review prior to implementation of all substantive temporary changes whether or not a safety evaluation is required. The Responsible Technical Reviewer may constitute one of the two management approvals.

Although our emphasis is in reducing the number of temporary changes, in the event a temporary change requires a safety evaluation, an Independent Safety Review will be performed prior to implementation in addition to the Responsible Technical Review providing there is no technical specification change required or unreviewed safety question involved. Independent Safety Review may be waived with the approval of the Director, Oyster Creek. While our current procedure requires an Independent Safety Review prior to implementation for procedure changes needing a safety evaluation, we will evaluate this requirement together with other aspects of our temporary procedure change process and may revise this requirement in the future. The Manager, Safety Review has been directed to evaluate this process in order to make recommendations for future changes. We will inform you of changes we plan to adopt, based on these recommendations.

Personnel are being instructed to pursue procedure changes via the normal process in order to reduce the number of temporary changes. In addition, the Shift Supervisors have been instructed to challenge the need for temporary changes. Guidelines in this regard have been issued.

In conclusion, the primary cause was an inadequate procedure attributed to an implementation failure of the temporary change process. The actions described above should reduce the number of temporary changes and strengthen the review process.

Very truly yours,

  
John J. Barton  
Vice President & Director  
Oyster Creek

JJB/PC:jc

cc: NRC, Document Control Desk  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager