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December 17, 1981

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Mr. R. R. Keimig, Chief
Projects Branch No. 2
Division of Resident and Project Inspection
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Keimig:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection No. 50-219/81-18

In accordance with the provisions of 10 CFR 2.201, this letter presents our response to the Notice of Violation regarding the inspection conducted by Mr. J. Thomas on September 15 - October 5, 1981.

Enclosed are our responses to the specific violations. If there are any questions regarding the enclosed information or additional information is required, please contact me or Mr. Michael Laggart of my staff at (609) 693-6932.

Very truly yours,

Philip L. Clark
Vice-President - Nuclear
Jersey Central Power & Light Co.
Executive Vice-President
GPU Nuclear

Sworn to and subscribed to before me this 17th day
of December 1981.

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Notary Public
PHYLLIS A. KABIS
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 16, 1984

cc: Mr. Ronald Haynes, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731

ENCLOSURE
Inspection No. 50-219/81-18

The following information provides a response to the violation contained in the U.S. Nuclear Regulatory Commission letter of November 12, 1981.

Violation A:

Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented, and maintained ..."

Procedure 106, Revision 18, dated August 4, 1981, "Conduct of Operations," requires, in part, that: "... a proper and orderly shift turnover be accomplished ... Further, the oncoming Group Operating Supervisor shall review and sign the Group Shift Supervisor Turnover Checklist and the Control Room Turnover Checklist and shall record the Group Shift Supervisor's Log ... a) Those items required by the Shift Turnover procedure ... Additionally, the control room operator shall record in the Control Room Log ... a) Those items required by the Shift Turnover procedure."

Contrary to the above, on September 29, 1981, the on-shift Group Operating Supervisor relieved one Control Room Operator of his duties for one hour and 42 minutes. Another qualified individual assumed the duties of Group Operating Supervisor and failed to conduct a shift turnover. Further, no log entries were made indicating transfer of responsibility from one individual to the other.

Response:

The violation is correct as stated above. The immediate corrective action effected by the Operations Manager was to reinstruct the individuals involved in the proper method of shift turnover (as delineated by Procedure 106 "Conduct of Operations"). All licensed operators will be required to read the Notice of Violation and response, and review the appropriate sections of Procedure 106 dealing with shift turnover by December 31, 1981.

The Director of Station Operations has issued a memorandum to station management reiterating the established requirements that all station personnel follow written procedures; that any procedure inadequacies identified be resolved; and that appropriate action be taken against any individual or organization observed not complying with procedures. In order to insure continuity of management's position, Procedure No. 106 will be revised to include a "procedure compliance section". This revision is expected to be issued by December 31, 1981. The corrective actions we have taken should ensure that future violations in this area will not occur.

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Violation B:

10 CFR 50, Appendix B, Criterion XI, "Test Control" states, in part, "A test program shall be established to assure that all testing required to demonstrate that ... systems ... will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the ... acceptable limits contained in applicable design documents ..."

The Oyster Creek Nuclear Generating Station Operational Quality Assurance Plan, Revision 5, dated April 1, 1981, Section VI.2, "Test Control," states, in part, "E. All testing required by ... Operating Technical Specifications ... shall be performed in accordance with written, approved procedures. During a procedure preparation, the following items, as a minimum, will be evaluated for applicability and inclusion: ... 14. Test acceptance limits ... F. Testing and test procedures shall meet the requirements of all applicable codes, standards, and regulatory requirements..."

Technical Specification 4.7.B, "Station Batteries," states, in part, "1. Weekly surveillance will be performed to verify the following: ... c. The overall battery voltage is greater than or equal to 120 volts (Diesel battery; 112 volts). d. The pilot cell specific gravity, corrected to 77°F is greater than or equal to 1.190. 2. Quarterly surveillance will be performed to verify the following: ... c. The specific gravity, for each cell, is greater than or equal to 1.190 when corrected to 77°F ... 3. At least once per 18 months ... b. Battery low voltage annunciators are verified to pick up at 115 volts +1 volt and to reset at 125 volts +1 volt (Diesel 112 volts +1 volt)."

Contrary to the above, station battery surveillance procedures do not conform to these requirements in that:

1. Procedure 634.2.002, Revision 5, June 30, 1980, "Main Station Weekly Battery Surveillance," specifies an overall battery voltage of greater than 105 volts.
2. Procedure 636.2.005, Revision 4, June 30, 1980, "Diesel Generator Weekly Battery Surveillance," specifies an overall battery voltage of greater than 98 volts.
3. Procedures 634.2.003, Revision 4, January 10, 1980, "Main Station Battery Monthly Surveillance;" 636.2.006, Revision 3, June 20, 1980, "Diesel Generator Monthly Battery Surveillance;" and the two previous referenced procedures do not specify correction of specific gravities to 77°F.
4. No procedures have been implemented to test the battery low voltage annunciators since the addition of this requirement to Technical Specifications by Amendment 55, dated August 13, 1981, to Facility Operating License DPR-16.

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Response:

The violation is correct as stated. The corrective action, with regard to the specific nonconforming procedures referenced above in Items 1 through 4, is as follows:

Item 1:

Procedure No. 634.2.002 "Main Station Weekly Battery Surveillance" was temporarily changed, upon identification of the violation to station management, to specify that the overall battery voltage shall be greater than 120 volts and the specific gravity corrected to 77°F. A permanent revision to this procedure was effected on October 28, 1981.

Item 2:

Procedure No. 636.2.005 "Diesel Generator Weekly Battery Surveillance" was temporarily changed, upon identification of the violation to station management, to specify that the overall battery voltage shall be greater than 112 volts and the specific gravity corrected to 77°F. A permanent revision to this procedure was effected on October 28, 1981.

Item 3:

Procedure 634.2.003 "Main Station Battery Monthly Surveillance" and Procedure 636.2.006 "Diesel Generator Monthly Battery Surveillance" were temporarily changed prior to conducting the required surveillances to reflect the correction of specific gravities to 77°F. Permanent revisions to the procedures were effected on October 28, 1981.

Item 4:

The low voltage alarm will be checked during the 18 month battery capacity test. The procedure for conducting this test and the test of the alarm will be changed prior to conducting the discharge test. The battery capacity discharge test is currently scheduled for the upcoming refueling/maintenance outage.

It shall be noted that the battery performance documented during surveillance testing met or exceeded the requirements of the Technical Specifications. The requirement to correct the specific gravity to 77°F was not documented but is standard practice among electricians conducting the testing.

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With regard to the repetitive nature of this violation, we feel that no additional procedural controls are required to assure that a repeat of this type of violation does not occur. The distribution of the Technical Specification Amendment to key personnel was done promptly and the individual assigned to revise the surveillance procedures was fully aware of his responsibility to do so. The assigned individual reviewed the surveillance procedures involved and made an incorrect determination that they satisfied the testing requirements of the Technical Specifications. The individual involved has been reinstructed in the need to assure compliance to Technical Specification testing requirements.