

GPU Nuclear

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TELEX 136-482
Writer's Direct Dial Number:

March 9, 1982

Mr. D. G. Eisenhut
Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Systematic Evaluation Program - Integrated Assessment

As suggested by you in the meeting between the NRC and SEP utility managements on December 17, 1981, careful consideration has been given to the possibility of performing the upcoming Integrated Assessment of Oyster Creek utilizing GPU Nuclear resources. We have determined that such an arrangement would be advantageous in terms of a timely completion and accurate representation of actual conditions at the Oyster Creek Plant.

GPU Nuclear possesses a great deal of expertise at the plant site and at corporate engineering offices; better access to technical information describing the plant; greater availability of docketed and undocketed material; more current details on actual plant configuration; and better capability to integrate potential modifications. We believe these advantages will enable us to better assess the safety significance of SEP topics during the integrated assessment. Further, our operating experience will help in assessing man-power requirements, cost-benefit considerations and man-rem effects in evaluating potential deficiencies and potential fixes, thereby enabling us to most effectively utilize GPU resources.

The main disadvantages involved in our performing the integrated assessment is that we have less familiarity with the drafting of NRC type SER's. In addition, more of our manpower would be diverted to support the program.

Based on the considerations outlined above, we have developed the attached "Plan for Completion of SEP Integrated Assessment (IA)". This delineates how we propose assignments of functions and responsibilities for the balance of SEP.

A035
3/11

We consider the attached schedule to be a realistic timetable of required events. In our January 11, 1982 letter to you, we expressed concern that the present schedule "is overly optimistic and does not adequately provide for owner interaction." Also our October 30, 1981 letter to you indicated similar concerns.

As a follow-up to this letter we would suggest a meeting at your offices within two weeks during which time all details would be thoroughly discussed.

In the event that any comments or questions arise, please call Mr. Yoshito Nagai of my staff at 201-299-2255.

Very truly yours,



P. R. Clark
Executive Vice President

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Plan for Completion of SEP
Integrated Assessment (IA)

<u>Responsibilities Under the Existing Plan</u>	<u>Steps for IA Completion</u>	<u>Responsibilities Under the Proposed Plan</u>
GPU/NRC	SAR Completion for the remaining topics	GPU/NRC
GPU	Review of the draft topic SERs (verification of facts used by NRC & conclusions reached)	GPU
GPU/NRC	GPU/NRC Meeting	GPU/NRC
NRC	Issuance of a final SER for each SEP topic	NRC
NRC	(Integrated Assessment)	GPU
GPU	Modification* Proposals for deficiencies w/schedule	GPU
NRC	Preparation & Issuance of a draft SER for Integrated Assessment (IA)	GPU
GPU	Review of the draft IA SER	NRC
GPU/NRC	GPU/NRC Meeting	GPU/NRC
NRC	Resolution of comments on the draft IA SER	GPU
NRC	Issuance of a final IA SER	NRC
NRC	Presentation of the final IA SER (& modification proposals) to ACRS	NRC
GPU	Modifications	GPU

*physical and/or administrative modification

Integrated Assessment (IA) Program

1. Establishment of IA Group

Licensing Engineers
O.C. Engineers
PRA Engineer
Other GPU Engineers (electrical, mechanical, structural)

2. Evaluation of significance of deviation

Safety significance - system analyses, PRA, etc.
Man-rem consideration
Cost benefit evaluation
Man-power requirement

(Use of a point system and/or assign an upper limit for each factor)

3. Identification and selection of recommended corrective actions, where necessary.
4. Establishment of the schedule for corrective actions.
5. GPU management review of the actions and schedule.
6. GPU/NRC meeting
7. Preparation of the draft IA-SER.

SEP SCHEDULE

SAR Completion

Review of Draft Topic - SER

*
GPU/NRC
Meeting

⊙
Issuance of
final Topic SERs

formation
of IAG

Evaluation of
significance
of deviation

Identification and
selection of
corrective actions

Integration

GPU management
review

*
GPU/NRC meeting

Preparation of
the draft IA-SER

Jan. Feb. Mar. Apr. May June July Aug. Sept. Oct. Nov. Dec. Jan. 83

1982

SEP SCHEDULE

SAR Completion

Review of Draft Topic - SER

*
GPU/NRC
Meeting

⊙
Issuance of
final Topic SERs

formation
of IAG

Evaluation of
significance
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Identification and
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GPU/NRC meeting

Preparation of
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Jan. Feb. Mar. Apr. May June July Aug. Sept. Oct. Nov. Dec. Jan. 83

SEP SCHEDULE

Review of
draft IA-SER
(NRC)

Resolution of comments
on the draft IA-SER

*
GPU/NRC
Meeting

Ⓞ
Issuance of
final IA-SER

□
Presentation of
final IA-SER to
ACRS

Jan. Feb. Mar. Apr. May June July Aug. Sept. Oct. Nov. Dec.

1983