



**GPU Nuclear**  
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Writer's Direct Dial Number:

June 15, 1982

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

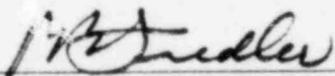
Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Generic Letter 82-05

As a result of discussions between our licensing representative and the project manager, it was decided to update and clarify my April 20, 1982 response to Generic Letter 82-05. For the purpose of completeness, we have included our responses to all of the specific NUREG 0737 items in Enclosure 1 of this letter.

In addition to the specific schedule justifications provided in Enclosure 1, it should be noted that Oyster Creek was originally scheduled to begin the Cycle 10 reload refueling outage in November 1981. For a number of reasons, this outage is now scheduled for January 15, 1983. While this may appear as a significant delay, the actual time of operation of the plant has only been extended by a period of approximately 6 months. Also, the plant is presently operating at approximately 84% of power and will coastdown until the refueling outage begins. These facts provide additional assurances that Oyster Creek will continue to operate safely until all the NUREG 0737 items can be completed.

Very truly yours,

  
Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF:JK:lse  
Enclosures

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ENCLOSURE 1

1. I.A.3.1 Simulator Exams

- This item was implemented in accordance with the NUREG 0737 schedule and Oyster Creek Operator candidates are administered their simulator exams as part of the Operator Licensing Examination process.

2. II.B.2 Plant Shielding

- This item is complete with the exception of tie-in for the Standby Gas Treatment System (SBGTS)
- The SBGTS tie-in will be made during the upcoming refueling outage.
- This is justified for the following reasons:
  - This tie-in is to an essential system which can only be accomplished during a refueling outage.
  - There are two (2) trains of SBGT in the event one filter train became saturated the redundant train would be available.
  - An additional shutdown would cause economic hardship for the GPU Corporation and its customers.

3. II.B.3 Post Accident Sampling

- The final modifications for taking a Reactor Coolant Sample will be installed during the Cycle 11 refueling outage.
- The justification for this schedule is provided in our December 24, 1981 submittal and Enclosure 3 thereto.

4. II.B.4 Training for Mitigating Core Damage

- Completed January 1982

5. II.E.4.2 Containment Isolation Dependability

- a. Part 5 - Complete in accordance with NUREG 0737 schedule.
- b. Part 7 - GPUN has requested deferral of this item pending NRC resolution of our position that the unique circumstance of Oyster Creek does not warrant this modification.
  - Justification is provided in the following letters: August 27, 1982; December 24, 1981; February 10, 1981; and February 25, 1982

6. II.F.1 Accident Monitoring

(1) Noble Gas Monitors

- To be completed during the Cycle 10 refueling outage
  - A plant shutdown is required to accomplish this which would cause severe economic hardship for GPUN and its customers.
- This schedule is justified by:
  - There are existing monitors; however, the instrument range is not as specified - NUREG 0737

(2) Effluent Monitoring of Iodine

- To be completed during the Cycle 10 refueling outage
  - A plant shutdown is required to accomplish this which would cause severe economic hardship for GPUN and its customers.

(3) Containment High Range Monitor

- To be completed during the Cycle 11 refueling outage.
- This is justified because of the following:
  - There are numerous other methods for detecting a major accident within containment such as high drywell pressure, low low reactor water level, torus water level, neutron monitoring, etc. Therefore, this instrument only provides an additional indication of major core degradation.

(4) Continuous indication of Containment Pressure

- To be completed during the Cycle 10 refueling outage
  - A plant shutdown is required to accomplish this which would cause severe economic hardship for GPUN and its customers.
  - There are existing monitors with control room indications; however, the range is not that specified in NUREG 0737.

(5) Continuous Indication of Containment Water Level

- To be completed during the Cycle 10 refueling outage
  - A plant shutdown is required to accomplish this which would cause severe economic hardship for GPUN and its customers.
  - There are existing monitors with control room indications; however, the range is not that specified in NUREG 0737.

(6) Continuous Indication of H<sub>2</sub> in Containment

- To be completed during the Cycle 10 refueling outage.
  - A plant shutdown is required to accomplish this which would cause severe economic hardship for GPUN and its customers.

7. II K.2.10 Safety Grade Training

Not Applicable

8. II.K.3.15 Isolation of HPCI and RCIC Modification

Not Applicable

9. II.K.3.19 Interlock of Recirc Pump

- Final modifications will be completed during the Cycle 11 refueling outage.
- Justification for this schedule is provided in our December 24, 1981 submittal and Enclosure 3 thereto.

10. II.K.3.22 RCIC Suction

Not Applicable

11. II.K.3.24 Space Cooling for HPCI/RCIC

Not Applicable

12. II.K.3.27 Common Reference Level

- Complete as stated in the following letters to you dated:

June 23, 1980, September 26, 1980, February 10, 1981, as clarified in our May 7, 1982 correspondence.