GPU Nuclear

GPU Nuclear
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Forked River, New Jersey 08731
609-693-6000
Writer's Direct Dial Number:

May 18, 1982

Mr. Thomas T. Martin, Director
Division of Engineering and
Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Inspection Report No. 50-219/82-05

In accordance with the provisions of 10 CFR 2.201, Attachment A to this letter presents our responses to the Notice of Violation transmitted in your letter of April 12, 1982. If there are any questions regarding the enclosed information please contact me or Mr. Michael Laggart of my staff at (609) 693-6932.

Very truly yours,

Peter B. Fiedler
Vice President and Director
Oyster Creek

Sworn to and subscribed to before me this 18 day of May, 1982.

Michael W. Laggart
Notary Public

MICHAEL LAGGART
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires October 31, 1985

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

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

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ATTACHMENT A

Violation A:

10 CFR 50, Appendix B, Criteria V and VI, state, in part, that activities affecting quality shall be prescribed by documented procedures appropriate to these circumstances and approved for release by authorized personnel.

Jersey Central Power and Light Company Operational Quality Assurance Plan (JCP&L OQAP), Section X, "Management and Use of Documents," states in part that procedures shall be prepared and approved in accordance with Appendix B of the JCP&L OQAP.

JCP&L OQAP, Appendix B, states that administrative procedures are to be prepared and approved concerning the activities of GPU Corporation Groups.

Contrary to the above, as of February 19, 1982, appropriate administrative procedures for activities affecting quality were not prepared, were not adequately prepared, or were not properly approved in that:

-- Maintenance and Construction Division, except for one procedure, had not prepared any new administrative procedures nor updated existing administrative instructions for performing modification activities at Oyster Creek Nuclear Generating Station.

-- Technical Functions Division procedures reference the following procedures for performing certain aspects of design and modification, although the referenced procedures have not been prepared or have been prepared and issued without final approval:

(1) EMP-14, "Design Review" (unapproved draft);
(2) EMP-17, "Project In-Service Completion Reports" (not issued);
(3) EP-002, "Drawings" (unapproved draft);
(4) EP-014, "Station Design Criteria Document" (not issued); and,
(5) EP-021, "Technical Manuals" (not issued).

-- Oyster Creek Procedure No. 105, Paragraph 5.7, "Non-Routine Maintenance, Modifications," specifies a method for performing modifications which is obsolete and has been superceded by Technical Functions Division procedures.

The above are examples; further examples are detailed in the attached inspection report.

Response:

The Maintenance and Construction Division is in the process of developing, drafting, and revising for review administrative instructions, which when issued, will define the methods which will govern Maintenance and Construction - Oyster Creek conduct of activities. The instructions will address the following areas of activities and will set forth the objectives, responsibilities and requirements of each:

1. Work Planning System
2. Control of Production Work
3. Work Documents Control System
4. Work Documents Close Out System
5. Special Procedures and Specifications Review and Approval System
6. Training Requirements and Training Coordinating Activities
7. Technical Functions Engineering Projects Interface
8. Oyster Creek Plant Work Interface
9. Start-up and Test Interface

The development of the above administrative instructions may result in consolidation or expansion of the above topics. Issuance of the above instructions is expected by October 1, 1982 and will be in effect prior to the start of our upcoming refueling outage.

JCP&L Quality Assurance 2000 and 6000 series procedures are the controlling documents in use at Oyster Creek to control design activities. Currently, these procedures are being superseded by approved Technical Functions Division procedures. We have not replaced any 2000 or 6000 series procedure with an unapproved or draft Technical Functions procedure.

The following is a status of the procedures referenced in the inspection report: EP-002, "Drawings," was approved 6-5-81. EP-002 is not a draft. Apparently there was some confusion about the status of this procedure because no initials appear next to Rev. 3 on the cover sheet. This came about because a new cover sheet was prepared for Rev. 3. EP-021, "Power Plant Systems Lists," was approved on 2-26-82. EP-029, "Analysis of GPUN Plant Transients," was approved on 3-24-82.

The remaining three procedures, EMP-14, "Design Review," EMP-017, "Project In-Service Completion Reports," and EP-014, "Station Design Criteria Document" are currently under development; however, we do not believe the quality of design work currently in progress is impacted. EP-026, "Spare Parts Recommendation" and EMP-018 "Conceptual Design Proposal," will be deleted from Appendix C of EMP-019 "Plant Modifications Engineered by Plant Engineering."

In the past, we have referenced procedures scheduled for issue, but not yet issued to provide continuity; however, as can be seen we were overly optimistic in establishing the schedule to draft, review and issue these documents. Our current practice is to omit references when we cannot establish an issue date with confidence. The procedures referenced above that are still under development/review are scheduled to be issued by July 1, 1982.

With regard to the Oyster Creek Division Procedure No. 105 "Conduct of Maintenance," a procedure revision was effected on April 8, 1982 which incorporates the Technical Functions procedure series and eliminates references to the deleted JCP&L Generation Department procedures. Existing Oyster Creek division administrative procedures will be routinely reviewed for compatability with approved interfacing division procedures. Revisions, as required, will be issued to reflect organizational responsibilities and interfaces.

Violation B:

10 CFR 50.59(b) states, in part, that a report, containing a brief description of facility changes, tests, and experiments, and summary of the safety evaluation of each, shall be forwarded to the NRC at least annually.

Contrary to the above, as of February 19, 1982, a report, containing descriptions and safety evaluation summaries for facility changes, tests and experiments performed during the Year 1980 had not been prepared or forwarded to the NRC.

Response:

The required 10 CFR 50.59(b) report, for the Year 1980, is currently being prepared and will be submitted by June 30, 1982.

The reorganization of GPU Nuclear transferred the responsibility for the preparation of the annual report from the Oyster Creek Division to the Technical Functions Division. Specific responsibility for the Year 1980 was inadvertantly not assumed by either division.

The licensing department has since established a formal tracking system for all regulatory required reports. The system assigns responsibility for the report preparation to the cognizant department within GPUNC and tracks the project to completion. A report of the system status, items that are approaching their respective due dates, is provided to upper management on a monthly basis. This system should help ensure violations of this nature are avoided in the future.

Violation C:

10 CFR 50, Appendix B, Criterion XVIII, states, in part, that followup action to audits shall be taken where indicated.

Jersey Central Power and Light Operational Quality Assurance (QA) Plan (JCP&L OQAP) states, in part, that the QA Program complies with ANSI N18.7-1976. ANSI N18.7-1976, Paragraph 5.2.11, states, in part, that noncomformances shall be promptly identified and corrected.

JCP&L OQAP, Section XI, "Nonconformances/Corrective Action," states, in part, that "Each Vice President, Director and Manager is responsible for the disposition and corrective action of nonconformances identified within the scope of his responsibilities..."

Contrary to the above, a nonconformance identified in one of your audits was not promptly corrected nor was adequate followup action taken to assure prompt corrective action in that:

Audit No. S-OC-81, Finding No. 3, performed July 20, 1981 identified several deficiencies in the performance of Oyster Creek Procedure 124, "System/Equipment Turnover after Modification."

The response by management responsible for this procedure stated that the procedure needed revision and [illegible] be revised by December 31, 1981. As of February 19, 1982, Proced[illegible] has not yet been revised to correct deficiencies identified [illegible]y 20, 1981.

Response:

Oyster Creek Procedure No. 124 was written as a modification tracking mechanism that would ensure applicable items such as drawing revision, procedure revisions, spare parts, training, etc. would be addressed by the various responsible divisions within GPUNC. At the time the procedure was drafted, most of the items were not procedurally referenced in the support divisions. Upon recognizing that inter-divisional support procedures would not be effected by December 31, 1981, the status of the audit resolutions should have been updated with a new target completion date.

Procedure 124 is currently being revised; however, the scope of revision has been expanded to include a formal turnover to plant operations of all newly installed modifications. As explained in our response to the SALP evaluation dated May 6, 1982, a completed modification under this program, will be accepted based on the completion of preestablished conditions. The conditions specified for each modification will be formulated at a planning meeting after construction activities have been authorized. Preestablished conditions being addressed include:

1. Installation completed

2. Start-up and testing completed

3. Quality Control completed

4. Training completed for operations personnel concerning the installed modification

5. All applicable operating procedures revised

6. Required spare parts identified

7. Preventative Maintenance Procedures written and Preventative Maintenance schedule updated

8. All applicable drawings revised

9. Surveillance procedures and the Master Surveillance schedule revised

The interfacing departments or divisions assigned responsibility for completion of the preestablished conditions will meet formally to verify and sign-off that the modification can be put into service.

The following departments will be involved as appropriate:

1. Plant Operations - Oyster Creek Division
2. Plant Maintenance - Oyster Creek Division
3. Plant Engineering - Oyster Creek Division

4.	Project Engineering	- Technical Functions
5.	Start-Up and Test	- Technical Functions
6.	Maintenance and Construction	- Maintenance and Construction
7.	Training and Quality Control	- Nuclear Assurance Division
8.	Configuration Control	- Technical Functions

The review, approval, and implementation of the revised procedure will be effected prior to the start of the upcoming refueling outage.