

**Nuclear**

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

September 24, 1990

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Revised Response to Notice of Violation  
Inspection Report 89-12

By letter dated September 8, 1989, GPU Nuclear submitted the response to the Notice of Violation documented in Appendix A to NRC Inspection 50-219/89-12. Example B in the violation noted that four containment isolation valves were reverse direction tested and that adequate documentation for the acceptability of the reverse direction testing was not available, as required.

GPU Nuclear responded that: 1) 13 valves were being reverse direction tested; 2) written justification for the reverse direction testing was completed for nine of the valves; 3) an engineering evaluation was performed to demonstrate valve acceptability for the remaining four globe valves; and 4) any requisite modifications to these four valves would be completed prior to restart from refueling outage 13R.

Subsequent to that submittal, extensive research and evaluation into valve design yielded new information. Seven of the nine valves which were found acceptable for reverse direction testing of the valve seat (10CFR50 Appendix J, Type C testing) were wafer seal butterfly valves. This valve configuration has an innermost seal which is only tested during a 10 CFR 50 Appendix J Type A test. This innermost seal has been determined to be more appropriately classified as a 10 CFR 50 Appendix J, Type B penetration.

In order to test these new Type B penetrations, additional modifications will be required. The most effective resolution would be the installation of spectacle flanges adjacent to the butterfly valves. The spectacle flange would contain a testable O-ring to allow Type B testing. The existing flanges provide a passive barrier to containment pressure in that no movement of mechanical parts is required to perform the boundary function. Previous test data of similar flanges has generally yielded acceptable leakage results. In addition, should a butterfly valve flange connection be disassembled for any reason during 13R, the spectacle flange modification will be installed and the Type B test performed prior to startup. The four previously identified globe valves will all be modified prior to restart from 14R rather than 13R as previously stated.

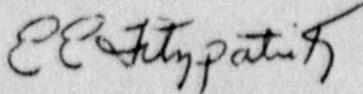
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If there should be any further questions, please contact Mr. John Rogers, at (609)971-4893.

Very truly yours,



E. E. Fitzpatrick  
Vice President and Director  
Oyster Creek

EEF/JJR/dmd  
(JR-LTRS2:23)

cc: Mr. Thomas T. Martin, Administrator  
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