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January 7, 1983

Mr. Richard W. Starostecki, Director
Division of Project and Resident
Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

DESIGNATED ORIGINAL
Certified By J. Martin

Dear Mr. Starostecki:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Notice of Violation Dated December 7, 1982

In accordance with 10 CFR 2.201, the attachment to this letter provides our response to the Notice of Violation contained in your letter of December 7, 1982.

If you should have any questions, please contact me or Mr. Michael Laggart of my staff at (609) 971-4643.

Very truly yours,

Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF:PFC:jal
Attachment

cc: Mr. Ronald C. Haynes, Administrator
Region I
U.S. Nuclear Regulatory Commission
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

The Violation states:

Technical Specifications 3.1.A, 3.8, and Table 3.1.1.H requires that an operable trip system be available to cause isolation of an isolation condenser during power operation when reactor water temperature is above 212°F. The isolation system must be capable of automatically closing two redundant valves in the influent steam line and two redundant valves in the condensate return line of an isolation condenser whenever a high flow condition in either the steam or condensate return line is detected. If these specifications cannot be met, the isolation condenser must be manually isolated.

Contrary to the above, while the plant was operating with the reactor water temperature above 212°F, the following conditions were identified:

1. On September 27, 1982, the isolation trip system for the 'B' Isolation condenser was not capable of automatically closing isolation valve V-14-32 in the influent steam line in that this valve was electrically defeated in the open position for about 6 hours (to add packing) and the Isolation Condenser was not isolated.
2. On September 29, 1982, the isolation trip system for the 'A' Isolation Condenser was not capable of automatically closing isolation valve V-14-31 in the influent steam line in that this valve was electrically defeated in the open position for about 8 hours (to add packing) and the Isolation Condenser was not isolated.

This is a Severity Level IV Violation (Supplement I)

Response:

We concur with the violation as stated.

Technical Specification Section 3.1.A, Table 3.1.1, Item H requires two (2) operable Instrument Trip Systems to isolate the Isolation Condenser in the event of a high flow signal in either the inlet steam or condensate return lines.

This Technical Specification is not, however, specific regarding intent. One understanding, based upon the description of applicability of Section 3.1, was that this specification applies strictly to the protective instrumentation only, allowing one redundant isolation valve to be inoperable. In this configuration, the trip systems would still be capable of isolating the Isolation Condenser with the remaining three valves. Therefore, in the instances described in the Notice of Violation and as discussed in the body of Inspection Report No. 82-22, both Isolation Condensers were operable to perform their intended function with adequate assurance that their isolation capability remained intact, although partial isolation redundancy was lost for a short duration of time. Conversely, the interpretation provided as the basis for the Notice of Violation requires that all four isolation valves for an Isolation Condenser must be capable of the isolation function at all times when the Isolation Condenser is in service. Consequently, for those periods when an isolation valve is rendered inoperable for a planned maintenance activity such as valve packing replacement, the affected Isolation Condenser is to be isolated, resulting in the loss of a redundant heat sink.

Response: (Continued)

Operations management, in its determination of system configuration for Isolation Condenser isolation valve maintenance, believed the Technical Specification allowed the flexibility of removing an isolation valve from service to add packing with reasonable assurance of isolation capability. The basis for this determination was that plant operation was more conservative as regards the ability to maintain both Isolation Condensers operable to perform their designed function.

We are currently evaluating this situation from a nuclear safety standpoint with regard to the appropriate action that should be taken to provide for maximum plant safety. Regardless of the results, a Technical Specification Change Request will be submitted to clarify the present specification.

In order to prevent a recurrence of this violation, all Group Shift Supervisors were informed of the violation and how the Technical Specification involved is to be applied in the future, i.e., if an Isolation Condenser isolation valve is found to be, or rendered, inoperable, the affected Isolation Condenser will be declared inoperable and isolated. Additionally, to reconfirm this understanding and to further assure all Group Shift Supervisors are aware, the Manager - Plant Operations will issue a memorandum to all Shift Supervisors discussing this violation and proper action to be taken. Since the violation resulted from an Operations management decision, the corrective action stated is sufficient to prevent recurrence. Full compliance is being achieved.