GPU Nuclear

GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

C321-94-2041
March 25, 1994

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket Number 50-219/93-81
Response to Notice of Violation

Pursuant to the provisions of 10 CFR 2.201, the enclosure provides GPU Nuclear Corporation's response to the Notice of Violation contained in the NRC Enforcement Conference and Notice of Violation for Inspection Report 50-219/93-81.

GPU Nuclear Corporation (GPUN) has and continues to develop and implement initiatives focused on establishing continuous improvement in performance. GPUN agrees with the findings found by the NRC and have taken corrective actions to resolve the problem.

Should you have any questions or require additional information please contact Mr. Joseph Andrescavage of my staff at 609-971-4862.

Very Truly Yours,

John J. Barton
Vice President and Director

JJB/JFA/gl

Enclosure
cc: Administrator, Region 1
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

IE01

ENCLOSURE

Violation: Technical Specification 3.4.A.3 requires in part, if one core spray system loop becomes inoperable during the run mode, the reactor may remain in operation for a period not to exceed 7 days provided average planar linear heat generation rate (APLHGR) of all rods in any fuel assembly, as a function of average planar exposure, at any axial location shall not exceed 90% of the limit given in specification 3.10.A. The action to bring the core to 90% of the APLHGR Limits must be completed within two hours after the system has been determined to be operable.

Contrary to the above, May 8, 1992, and October 31, 1992, one core spray system was inoperable during the run mode and average planar linear heat generation rate (APLHGR) of all rods in any fuel assembly, as a function of average planar exposure, at any axial location was not at 90% or less of the limit. Specifically, the most limiting APLHGR in the reactor core was greater than 90% of the limit with one core spray system inoperable for greater than two hours.

Response: GPUN concurs with the violation as stated.

The violation is a result of not revising applicable procedures subsequent to the issuance of the Technical Specification Amendment 153.

On September 5, 1991, Technical Specification Amendment 153 became effective requiring Average Planar Linear Heat Generation Rate (APLHGR) reduction to less than 90% of the limit if one core spray loop/component becomes inoperable.

On October 21, 1993, it was identified that several core spray system surveillance procedures rendered both main pumps or main discharge valves of the system under test inoperable. In reviewing past surveillances it was identified that on four occasions the APLHGR exceeded 90% of the limit during the execution of these procedures.

The safety significance of this event is minimal since the design basis for APLHGR exceeds the amount by which the plant operated above the technical specification limits. In addition, operator actions could have brought the core spray loop to full operable status, in the event the system was needed.

Interim corrective action was taken to ensure that APLHGR does not exceed 90% of the limit during the execution of the subject procedures.

Long term corrective action consists of system review for possible modification to allow for system surveillances to be performed without declaring core spray system inoperable. In addition, a risk based analysis is being performed to evaluate a possible modification to the technical specifications to provide an acceptable allowed out of service time for core spray system surveillance and preventive maintenance as well as an increase to the current surveillance interval.

Full compliance was achieved on October 11, 1993, when guidance was provided to operators to reduce APLHGR to less than 90% of the limit when performing surveillances which render a core spray system inoperable.