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TELEX 136-482
Writer's Direct Dial Number:

October 18, 1982

Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Crutchfield:

SUBJECT: Oyster Creek Nuclear Generating Station
License No. DPR-16
Docket No. 50-219
Systematic Evaluation Program (SEP)

Your letter of July 14, 1982 requested that we provide comments on SEP Phase II. By letter dated August 16, 1982, we provided you with our comments on the program. Those comments reflected our experiences up to that date. Since that time, there has been considerable progress made in completing the SEP evaluation of Oyster Creek; and we feel it is appropriate at this time to provide additional comments.

Our comments are as follows:

1. An original objective of the SEP program was to provide for balanced decision making with regard to backfits; through the efforts of the SEP Branch Staff, significant headway has been made in this area. With input from our Staff, a concerted effort was made to evaluate any potential backfit taking into consideration: risk, cost, personnel exposure, schedules, and relative priorities. We feel this effort was effective for the SEP items. However, while the SEP Branch Staff did try to factor in the impact on Oyster Creek of other regulatory requirements (NUREG 0737, Appendix R, Heavy Loads, 10CFR50.48, Equipment Qualification, Emergency Planning, etc.), they could not prioritize any of those issues thereby reducing the effectiveness of the integration/prioritization process.

2. In our previous letter, we had commented on the NRC Staff reviewers inflexibility with regard to prescriptively applying the Standard Review Plans (SRPS). Based on recent experience, we withdraw that comment. We believe that during the final stages of the Program the SEP Staff properly

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Systematic Evaluation Program (SEP)

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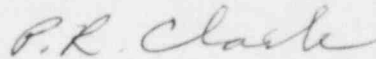
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and effectively assessed the safety intent of the Standard Review Plans and evaluated our alternative proposals on their own merits. In general, we feel that the integration process that was applied to the Oyster Creek SEP topic assessment was effective in evaluating those areas where Oyster Creek differed from the SRP.

The comments provided by our August 16, 1982 letter, except as noted above, are still considered appropriate.

In the event that you should have any questions or wish to discuss this matter further, please contact Mr. J. Knubel at (201) 299-2264.

Very truly yours,



P. R. Clark
Executive Vice President

pk

cc: Ronald C. Haynes, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
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NRC Resident Inspector
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