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Writer's Direct Dial Number:

C321-94-2016
February 22, 1994

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

Dear Sir:

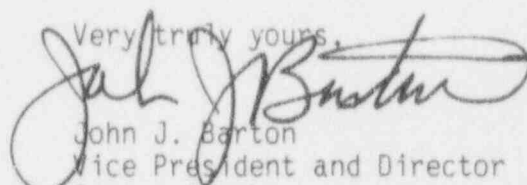
Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 50-219/93-28
Reply to a Notice of Violation

Enclosure 1 to NRC Inspection Report 50-219/93-28 contained a Notice of Violation. Attachment I to this letter contains the reply to that Notice of Violation, as required by 10 CFR 2.201.

Due to receiving the above Inspection Report on February 4, 1994, we requested a response time extension from the Region I office on February 7, 1994. Approval was obtained from the Region I office on February 8, 1994 to extend the response time to March 4, 1994.

The procedure change and safety review processes were reviewed and determined to contain features necessary to minimize personnel error: i.e., provision for field walkdown verifications, requirement for independent review by knowledgeable and experienced individuals, statement of reviewer responsibilities, and requirements for reviewer training and experience. In addition, the modification process was reviewed and determined to also contain similar features necessary to minimize personnel error. Personnel responsible for implementation of these processes were informed of this event. Personnel performance expectations, as guided by these processes, has been reinforced through communications with the personnel to help prevent similar occurrences in the future.

Should you have any questions, please contact Mr. Terry Sensue, Oyster Creek Licensing Engineer at 609-971-4680.

Very truly yours,

John J. Barton
Vice President and Director
Oyster Creek

JJB/TS:jc
Attachment
cc: Administrator, Region 1
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

9403040075 940222
PDR ADOCK 05000219
PDR

JEB

Attachment I

Violation:

10 CFR 50 Appendix B, Criterion VI, on document control requires, in part, that measures shall assure that documents, such as procedures, including changes, are reviewed for adequacy.

Contrary to the above, between August 19, 1993 and September 13, 1993, an operating procedure change was made and not properly reviewed for adequacy. Specifically, Procedure 225.0, Revision 9, "Backseating and Unbackseating Station Valves," did not describe correct implementation of jumpers necessary for electrical backseating of the isolation condenser (steam isolation) valve V-14-32. Implementation of the incorrect procedure steps resulted in unexpected valve actuation on December 15, 1993.

GPUN Reply:

GPUN concurs with the violation as written.

Reason for the Violation

The cause of the violation was personnel error in changing procedure 225.0 between August 19, 1993 and September 13, 1993. Personnel failed to check the key details of the valve control circuit and did not physically check the jumper connection points in the field.

A contributing cause to the violation was personnel error in preparing a plant modification for the elimination of potential hot shorts in motor operated valves (MOV's). Personnel failed to identify the required procedural reviews to support the change to the valve control circuit configuration. Thus, procedure 225.0 was not revised immediately following the installation of this modification to the valve control circuit.

Corrective Actions Taken and the Results Achieved

The jumper was immediately removed. Valve motion was stopped and valve damage was prevented.

A temporary revision to procedure 225.0 was implemented. Electrically equivalent connection points were determined and used. The valve was backseated in a controlled manner.

**Attachment I
(Continued)**

A permanent revision to procedure 225.0 was developed, reviewed, field verified, and implemented. Jumper instructions for all valves in procedure 225.0 were reviewed and revised as necessary.

Corrective Steps Taken to Avoid Further Violations

Technical Review personnel were informed promptly by Electronic Mail, and subsequently in greater detail by printed Newsletter, of the event and reminded to understand the technical details before approving a change.

The Oyster Creek Division Safety Review Coordinator was directed to include this event in cyclic training for Technical Review personnel to reinforce the need for personal accountability and attention to detail.

Department Heads were informed of the problem with the connection points, reminded to require a walkdown when appropriate, and requested to reinforce their expectations down through their organization.

A permanent revision to procedure 124, "Plant Configuration Change Control", and 124.2, "Control of Engineering Directed Corrective Changes and Modifications", has been developed and is being reviewed. These improvements are to assure cross disciplinary procedure reviews are performed when necessary and the results of the reviews are documented for plant modifications.

Date When Full Compliance was Achieved

Full compliance was achieved on **January 13, 1994** when the permanent revision to procedure 225.0 was issued.