

GPU Nuclear
P.O. Box 388
Forked River, New Jersey 08731
609-693-6000
Writer's Direct Dial Number:

September 30, 1982

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

Dear Mr. Starostecki:

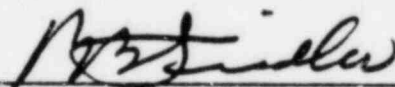
Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Inspection No. 50-219/82-18

This letter is submitted in response to your letter of August 30, 1982, regarding the findings of the July 6 - August 2, 1982 routine inspection by Mr. John Thomas of your staff.

In accordance with 10 CFR 2.201, Attachments A and B represent our responses to the violations. Appendix B contains information which, if released to the public, would compromise the physical security of the Oyster Creek Station. It is therefore requested, pursuant to 10 CFR 2.790, that Appendix B be withheld from public disclosure. In accordance with 10 CFR 73.21, this section has been classified as safeguards information.

If there are any questions regarding the supplied information, 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:MWL:lse
Attachments

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

8212210468 821214
PDR ADOCK 05000219
Q PDR

APPENDIX A

RESPONSE TO NOTICE OF VIOLATION

Violation A:

Technical Specification 6.8.1 requires that procedures be established, implemented, and maintained. Procedure 105, Revision 17, April 26, 1982, "Conduct of Maintenance," Procedure 105.1, Revision 1, April 8, 1982, "General Troubleshooting and Corrective Maintenance," and Procedure 116, Revision 9, April 8, 1982, "Surveillance Test Program Schedule and Review of Test Results," require that electrical enclosures, opened during maintenance or surveillance, be closed with appropriate seals in place and in good condition.

Contrary to the above, three reactor protection system electrical terminal boxes and three instrument transmitters on instrument rack RKO4 were found with their enclosures not properly sealed on July 29, 1982.

Response:

Upon identification of the deficiencies by the Resident Inspector, our immediate corrective actions were to secure the referenced enclosures and check all other instrument racks for similar conditions.

We reviewed the management controls described in our response to IE Inspection No. 50-219/82-02 due to the recurrent nature of this violation. We feel the procedural requirements instituted were adequate. In order to insure accountability, all applicable electrical and instrumentation personnel will be required to read and acknowledge, by signature, the referenced requirements. Disciplinary action will then be taken, if the procedures are not adhered to.

Violation B:

Technical Specification 6.8.1 and American National Standard N18.7-1972, Section 5.3 require that startup procedures include confirmation that valves are properly aligned. Procedure 108, Revision 29, "Equipment Control," requires equipment to be returned to positions specified by applicable lineup sheets prior to removal of tag and return of equipment to service.

Contrary to the above, procedures as implemented did not adequately confirm proper system realignment in the following cases: fire protection deluge system, outages 82-912 and 82-926, July 15 and July 22, 1982, respectively; demineralized water pump 1-2, outage 82-923, July 21, 1982; supply fan 1-16, outage 82-924, July 22, 1982; Standby Gas Treatment System fan 1-8, outage 82-933, July 26, 1982; and, condensate transfer isolation valve, outage 82-943 July 27, 1982.

Response:

In response to the above referenced violation, the deficiencies identified by the NRC resident inspector, regarding switching and tagging, were reviewed by our staff. Additional switching and tagging documents were also reviewed to provide a basis for our response and to determine if generic problems existed with procedure implementation and/or procedure adequacy. In addition to the 47 tag-outs audited by the inspector, 100 completed tag-outs, filed in the Document Control Center, were reviewed for completeness. Of the 147 tag-outs reviewed, only (4) were incomplete as evidenced by the lack of documentation in the "Position After Tag Removal" section. The remaining tagouts were complete, although as indicated in the report, not all of the documentation strictly conformed with the requirements of Equipment Control Procedure (No. 108). Each of the specific tag-outs listed in the report were reviewed and the problems identified by the inspector were discussed with the operators involved. With the exception of one of the tag-outs, a cogent measure of justification for the operators' deviation from strict adherence to the procedure could be supported, due to the ambiguity of the procedure requirements. Additionally, the fact that our review of 147 tag-outs and the discovery of only these documentation problems and determination of the cause, supports a position that a procedural inadequacy also exists. In its present form, Procedure 108 does not provide the control and flexibility necessary to allow for various plant operations and strict procedure compliance, such as system testing or multiple tag-outs, on the same system simultaneously.

Review of the aforementioned Document Control records provide further reassurance that we do, however, maintain adequate control over system alignments.

Due to earlier determinations of procedure problems, Equipment Control Procedure (108) was scheduled for review and revision. Operations Department personnel, assisted by an outside consultant, have recently completed a review of Procedure No. 108. In its revised form, the procedure should provide the higher degree of control required and also provide enough flexibility for system testing which, as previously stated, does not presently exist. Once the procedure revision is approved, all Operations Department personnel will be required to review the entire procedure and the results of this inspection report as required reading. To further enhance proper implementation, a directive will be issued to all Operations Department personnel further stressing the importance of and our commitment to procedure compliance. The completed revision of Equipment Control Procedure (108) is now being reviewed by the Operations Department and should be submitted to the Plant Operations Review Committee (PORC) by the end of September. Changes to the procedure include the development of new tags, revisions to the Outage Request Form, revisions to the Switching and Tagging Log Sheet, inclusion of additional safety requirements, and provisions for additional testing and verification. Changes were also made to key control, locked valve control, jumper control, etc. Once implemented, the procedure should provide comprehensive control over system alignments, while providing as well, maximum personnel safety and sufficient flexibility for system/component testing or other tagging outages.

In order to further assure compliance with Equipment Control Procedure (108) and prevent recurrence of the problems identified in this report, additional monitoring of switching and tagging activities will be performed by Operations Management.

APPENDIX B

RESPONSE TO NOTICE OF VIOLATION

THIS PAGE, CONTAINING SAFEGUARDS INFORMATION,
NOT FOR PUBLIC DISCLOSURE,
IS INTENTIONALLY LEFT BLANK