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November 30, 1982

Docket No. 50-219
License No. DPR-16
EA 82-108

GPU Nuclear Corporation
ATTN: Mr. P. B. Fiedler
Vice President and Director
Oyster Creek Nuclear Generating Station
P. O. Box 388
Forked River, New Jersey 08731

Gentlemen:

This refers to the NRC inspections conducted between November 3, 1981 and March 17, 1982 at the Oyster Creek Nuclear Generating Station, Forked River, New Jersey, of activities authorized by NRC License No. DPR-16. The reports of the subject inspections, without a Notice of Violation, were forwarded to you as attachments to our April 12, 1982 letter.

The NRC resident inspector identified a violation of a Technical Specification limiting condition for operation (LCO) on December 4, 1981. Namely, a mechanical defect in valve V-14-30, an isolation valve for the "A" isolation condenser, existed which would likely have prevented the valve from automatically closing as required, and this valve was not manually closed as required by the LCO action statement. Problems with automatic closing had been identified during previous surveillance tests of the valve, but appropriate remedial actions were not taken. However, the redundant isolation valve V-14-31 was operable, as demonstrated by a surveillance test. Thus, there existed reasonable assurance that automatic isolation of the "A" isolation condenser would have occurred if needed.

The second violation involved the improper reassembly, after maintenance, of vacuum breaker/primary containment isolation valve V-26-18 during the 1980 refueling outage, and the subsequent leak rate testing which failed to disclose the improper reassembly. As a consequence, the valve was inoperable for approximately 21 months. This situation was discovered by licensee personnel on February 26, 1982, during a followup investigation of the failure of this valve to pass a local leak rate test on February 7, 1982. This situation was reported in Licensee Event Reports 50-219/82-12/01P (dated March 1, 1982) and 50-219/82-12/01T (dated March 15, 1982). The inoperable valve reduced the conservatism provided in the system design. However, there existed reasonable assurance that the safety function which this valve was intended to furnish would have been provided because (1) there was a redundant vacuum relief flow path through a duplicate valve (V-26-16) having 100 percent capacity, and (2)

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the swing check valve (V-26-17), downstream of the affected valve (V-26-18), was capable of implementing the containment isolation. This capability was demonstrated in a post-repair, local leak rate test made before the misassembled valve was placed in service, and in a second leak rate test that was performed after this situation was discovered.

At the Enforcement Conference held on May 4, 1982 at Region I with yourself and members of the GPU staff, we discussed our concerns about these events and other associated activities including maintenance, modifications, testing, and surveillance of safety-related systems. You acknowledged that the underlying issue in both events was inadequate control and review of activities in the plant. The improper valve reassembly and testing occurred nearly two years ago. Subsequently, ongoing programs were started in 1980 to strengthen performance. These included additional procedural, management, and engineering oversight of in-plant maintenance and surveillance activities; and an increase in the onsite maintenance, training, and quality assurance staff from 114 personnel in January 1980 to 296 personnel in May 1982.

With respect to the operability of valve V-14-30, it is evident that a member of the operating staff did not properly evaluate the test results. There was sufficient test information indicating that the valve might not be able to close automatically. We understand that you have since taken corrective actions and have provided guidance to station operating personnel as to what constitutes acceptable surveillance practices. This included addressing the unacceptable attitude of members of your management staff that led to the improper evaluation in this case where three successive failures of the valve to close followed by two successful operations was considered acceptable component performance.

Upon review of the circumstances associated with these events and after consultation with the Director, Office of Inspection and Enforcement, I have been authorized to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalties in the cumulative amount of Forty Thousand Dollars. This action is being taken to emphasize the importance NRC places on proper surveillance testing and adherence to the Technical Specification limiting conditions for operations. Proper surveillance testing would have prevented both violations. The violations in the Notice have been categorized as Severity Level III in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C) published in the Federal Register, 47 FR 9987 (March 9, 1982).

You are required to respond to the Notice and you should follow the instructions therein when preparing your response. In your reply, you should give particular attention to those actions designed to assure continuing compliance with NRC requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

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The responses directed by this letter and the attached Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

/S/

Ronald C. Haynes
Regional Administrator

Enclosure:
Notice of Violation and
Proposed Imposition of Civil Penalties

cc w/encl;
M. Laggart, Licensing Supervisor
J. Knubel, BWR Licensing Manager
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
State of New Jersey
NRC Resident Inspector

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bcc w/encl:
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11-29-82

RI:DPRP	R1:DPRP	R1:DPRP	R1:EI	R1:DRA	RI:RA
Tripp/cgl	Keimig	Starostecki	Holody	Allan	Haynes
11/29/82	11-29-82		11/29/82	11/30	11/30

IE:ES	ELD	ES:D	IE:DD	IE:D
GBarber	Lieberman	Axelrad	Sniezek	DeYoung

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IE, EW concurrence by phone from Axelrad 11/23 DGH

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Ronald C. Haynes
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Tripp/cgl	Keimig	Starostecki	Holody	Allan	Haynes
11/19/82					

IE:ES	ELD	ES:D	IE:DD	IE:D
GBarber	JLieberman	Axelrad	Sniezek	DeYoung
11/19/82	11/18/82	11/19/82		11/23/82