

DCS

OCT 4 1991

Docket No. 50-219

License No. DPR-16

Mr. John J. Barton  
Vice President and Director  
GPU Nuclear Corporation  
Oyster Creek Nuclear Generating Station  
P.O. Box 388  
Forked River, New Jersey 08731

Dear Mr. Barton:

SUBJECT: INSPECTION NO. 50-219/91-08

This refers to your letter dated August 21, 1991, in response to our letter dated June 10, 1991, regarding Emergency Operating Procedures.

Thank you for informing us of the corrective actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed by:

Lee H. Bettenhausen, Chief  
Operations Branch  
Division of Reactor Safety

cc:

M. Laggart, Manager Corporate Licensing  
G. Busch, Licensing Manager Oyster Creek  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
K. Abraham, PAO (2) (w/letter dated August 21, 1991)  
NRC Resident Inspector (w/letter dated August 21, 1991)  
State of New Jersey (w/letter dated August 21, 1991)

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bcc:  
Region I Docket Room (with concurrences)  
Management Assistant, DRMA  
L. Bettenhausen, DRS  
R. Conte, DRS  
J. Joyner, DRSS  
W. Ruland, DRP  
Regional Coordinator, RI, EDO  
A. Dromerick, NRR/PD 1-4  
F. Young, SRI, Three Mile Island  
J. Beall, SRI, Beaver Valley  
E. Wenzinger, DRP  
K. Brockman, EDO  
DRS Files (3)

RI:DKS  
Hansell/ajk/dmg  
SEN 9/26/91  
09/25/91

RI:DRS  
Conte  
8  
09/27/91

RI:DRS  
Bettenhausen  
10  
09/31/91



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609 971-4000  
Writer's Direct Dial Number:

C321-91-2226  
August 21, 1991

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

Subject: Oyster Creek Nuclear Generation Station  
Docket 50-219  
Response to Inspection Report 91-08  
Emergency Operating Procedures

Dear Sir:

The purpose of this letter is to respond as requested to the deficiencies noted by the subject report dated June 10, 1991. GPU Nuclear is pleased that the NRC has recognized our past efforts and commitment to resolve these issues, and understands your concerns as stated in the report. Attachment 1 addresses our status of the deficiencies remaining.

Should you require further information, please contact Brenda DeMerchant, OC Licensing Engineer at 609-971-4642.

Very Truly Yours,

John J. Barton  
Vice President and Director  
Oyster Creek

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

9108280242

Attachment 1

(C521-91-2226)

Subsequent to the EOP inspection conducted the week of April 15, 1991, several items which were identified in the Inspection Report 91-08 as being deficient have been addressed and resolved. These items include:

- ° Procedure EMG-3200.03 "Level Restoration" flowchart has been revised to separately list CRD as an injection system in step LR-5.
- ° Procedure EMG-3200.11 "Secondary Containment Control" flowchart has been revised to correct discrepancies regarding concurrent performance of steps SC/T-3 and 4, SC/R-2 and 3, and SC/L-2 and 3.
- ° The borax and boric acid required to implement procedure 2000-OPS-3024.28 "Standby Liquid Control System - Diagnostic and Restoration Actions" are now stocked in the warehouse.
- ° Revisions to lesson plan 0623.2610/845.0.0030, "SBEOP Flowcharts" have been completed.
- ° Procedures EMG-3200.04 "Emergency RPV Depressurization" and EMG 3200.09 "Level/Power Control" have been revised to correct the wording problems noted.
- ° The concerns regarding plant labelling have been noted and a revision to Procedure 109 "Plant Labelling" has been made to state that "while the labelling project is in progress, some labelling may not comply with all requirements, particularly specialty label requirements (e.g., EOP valve labels may not have fluorescent orange background.)"

The following items will be addressed during the current operating cycle.

- ° Other procedures identified as being deficient including EMG-3200.02 "Primary Containment Control", EOP support procedure 312.1 "Bypassing Isolation Interlocks and Automatic Scram during Emergency Conditions" and 2000-OPS-3024.28 will be revised as appropriate.
- ° A formal validation and verification (V&V) will be conducted for all EOP flowcharts and support procedures directly referenced in the EOPs. The V&V is scheduled to begin during the fourth quarter of 1991 and will be completed after arrival and certification of the site specific simulator.
- ° Regarding the EOP training issues noted in section 1, the site specific job analysis (task listing) for the non-licensed operator position is now complete. The analysis of individual tasks continues.

- ° Development of the On The Job (OJT) training program for the non-licensed operator is ongoing and will be finalized by the fourth quarter, 1991.
- ° Draft writers guides 2000-STD-1218.03, 2000-STD-1218.04, and EOP administrative procedure 107.4 are in the process of being rewritten to address self identified and inspection related concerns.
- ° Flowcharts and text EOP's will be validated against the applicable writers guide after revisions to the writers guide have been completed.
- ° Concerns regarding discrepancies between the Plant Specific Technical Guidelines (PSTG's) and the EOP's will be resolved by the revision to the PSTG's now in progress.
- ° In order to address the concern that equipment operators are not fully aware of their specific responsibilities during emergency operations, discussions of the equipment operator responsibilities during emergency operations will be conducted with each shift. Operations upper management will stress the importance and function of the equipment operator responsibilities during the weekly plant status update meeting.