

DCS

FEB 06 1992

Docket No 50-219  
EA 91-145

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 Report No. 50-219/91-32

This refers to your letter dated December 17, 1991, in response to our letter dated November 19, 1991.

Thank you for informing us of the corrective and preventive 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

*Bill Ruland for*

Edward C. Wenzinger, Chief  
Projects Branch No. 4  
Division of Reactor Projects

cc w/encl:

- M. Laggart, Manager, Corporate Licensing
- G. Busch, Licensing Manager, Oyster Creek
- Public Document Room (PDR) (w/cy of Licensee's Response Letter)
- Local Public Document Room (LPDR) (w/cy of Licensee's Response Letter)
- Nuclear Safety Information Center (NSIC) (w/cy of Licensee's Response Letter)
- NRC Resident Inspector (w/cy of Licensee's Response Letter)
- State of New Jersey (w/cy of Licensee's Response Letter)

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PDR ADOCK 05000219  
Q PDR

IE01  
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bcc w/cy of Licensee's Response Letter:  
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 Management Assistant, DRMA (w/o encls)  
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 F. Young, DRP, TMI  
 J. Beall, DRP, Beaver Valley  
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*GDK*

RI:DRP

RI:DRP

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*f* D. Vito  
12/30/91

*TF*  
T. Frye  
12/31/91

*GDK*  
*f* W. Ruland  
2/6/92

*WWR*  
E. Wenzinger  
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C321-91-2332  
December 17, 1991

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

Dear Sirs:

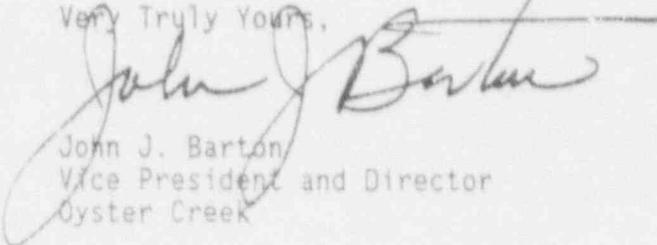
Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection Report 91-32  
Reply to a Notice of Violation

In accordance with 10 CFR 2.201, enclosed is GPUN's reply to the notice of violation identified in NRC Inspection Report 91-32.

GPU Nuclear fully concurs that operability decisions must be based on available information and predicated on a reasonable explanation that the equipment is operable. Additionally, in making operability decisions, the subject equipment or system is judged operable or inoperable and no indeterminate state of operability is recognized. The discussions of this particular event during the enforcement conference were beneficial and served to reiterate the principal of conservative operation of the plant at all times. As stated during our meeting and restated in your letter, we will give full commitment to requesting a temporary waiver of compliance when appropriate.

If further information is required, please contact Mr. Thomas Blount, Licensing Engineer, at (609) 971-4007.

Very Truly Yours,



John J. Barton  
Vice President and Director  
Oyster Creek

JJB/TB/jc  
cc: Administrator, Region I  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager

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**I. VIOLATION A.**

Criterion III, 'Design Control,' of 10 CFR 50, Appendix B requires that measures shall be established to assure regulatory requirements and the design basis for those structures, systems and components to which this Appendix applies are correctly translated into specifications, drawings, procedures and instructions. Further, measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components. The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of simplified calculational methods, or by the use of a suitable testing program.

Contrary to the above, measures were not established for the selection and review for suitability for pressure oscillation dampeners (snubbers). Between March 19 and April 11, 1991 Chemiquip model 25SD pressure oscillation dampeners (snubbers) were replaced with Cajon model SS-8-SA EW snubbers in the isolation condenser line break sensors without the appropriate engineering review. Subsequent licensee evaluation determined that the installed Cajon model SS-8-SA-EW snubbers rendered the isolation condenser condensate return line break sensors for both isolation condensers inoperable due to extended response times. These and other snubbers have not been included in design specifications or drawings.

This is a Severity Level IV Violation (Supplement 1)

**RESPONSE:**

GPUN concurs with this violation as stated.

The snubbers had been replaced with snubbers of a different manufacturer and type without performing an evaluation to assess the impact on the sensor response time. At the time of replacement the Chemiquip model 25SD snubbers were not in stock. The decision was made to replace these snubbers with Cajon SS-8-SA EW's. This was considered a replacement in kind and required no further assessment. Subsequent investigation and testing identified the significant difference in flow characteristics between the two types. Further, these differences were not readily apparent by review of the manufacturers catalog ordering information. This contributed to an improper selection.

Replacement of plant components are procedurally governed. In this instance the snubbers were treated as fittings with the resulting conclusion that a fitting capable of performing the same primary function must be the same as the original and therefore does not require engineering evaluation.

The lack of understanding of the impact snubbers have on instrument response has been identified as the underlying reason for this violation.

The immediate corrective action taken to address the Design Control issue was to identify the type and location of snubbers used in sensors for safety-related systems. This resulted in identification of snubbers in the main steam line break sensors and the core spray system differential pressure sensors. Concurrently, the snubbers in the isolation condenser line break sensors were removed. An initial assessment of the snubbers applicability in the main steam and core spray systems was performed with the result substantiating their use. Subsequently, a qualitative test was implemented to evaluate the response characteristics of the line break instruments.

Additional corrective actions taken consisted of a root cause evaluation, an independent review of the deviation reporting process, and a review of applications where snubber devices are used on critical plant instrumentation. This review was conducted to ensure that where snubbers are used, the appropriate device is identified and documented consistent with design control procedures. A subsequent review will also evaluate the need for enhanced programmatic controls and where necessary recommend such improvements. In each case the recommendations provided will be assessed for benefit and viability.

To ensure proper actions are taken, when a component is identified as not being under design configuration control, guidance will be promulgated to maintenance, engineering, and operation personnel.

The date when full compliance was achieved was November 8, 1991.

## II. VIOLATION B.

TECHNICAL SPECIFICATION 3.1 requires that the plant protective instrumentation listed in TABLE 3.1.1 to be operable. Table 3.1.1, Item H.2 specifies that the isolation condenser condensate return line high flow sensors shall be operable in the run mode. If an isolation condenser condensate return line high flow sensor is inoperable, the affected isolation condenser is required to be isolated.

Contrary to the above, from June 25, 1991 until September 26, 1991 the isolation condenser condensate return line high flow sensors for both isolation condensers were inoperable and the isolation condensers were not isolated.

This is a Severity Level IV Violation (Supplement I)

RESPONSE:

GPUN concurs with this violation as stated.

During the 13R outage the sintered metal snubbers (gauge savers) were replaced in the instrument lines to the Isolation Condenser line break detection instruments while implementing a system modification. Due to the type of snubber installed, if a line break had occurred in the condensate header of the IC's a significant time delay between the condition requiring action and the instrument sensing this condition existed. These snubbers created an instrument line restriction which was sufficient to preclude the isolation of the break within the sixty seconds specified in the UFSAR.

The reason these snubbers were used was because inadequate design controls were in place which allowed replacement of these devices with snubbers from a different manufacturer and of a different type. The snubbers which were installed were intended as replacement in kind. Only after subsequent investigation and testing was the instrument response delay known.

It should be noted that although the condensate line sensors would have introduced an extended time delay, the steam line sensors would have initiated the necessary isolation signal to shut the isolation valves. In essence the steam line sensors provided the redundancy to ensure that a break in the condensate line would be isolated in a timely manner. In addition, follow up testing and evaluation initially indicates that the sixty seconds for valve closure may be overly conservative. These aspects support the position that the safety significance is minimal.

The immediate corrective actions taken included commencing a reactor shutdown when it was postulated that the snubber performance might influence the sensor response time. Additionally, snubber use was evaluated which ultimately led to removal of the snubbers from the IC pipe break sensors. The use of instrument line snubbers on other safety related systems was immediately evaluated and determined to be appropriate for the current applications.

The completion of these corrective measures placed the plant in compliance with Tech Spec 3.1 Table 3.1.1 Item H2 which required no further action.

The date when full compliance was achieved was September 26, 1991.