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C321-92-2108
April 1, 1992

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

Dear Sirs:

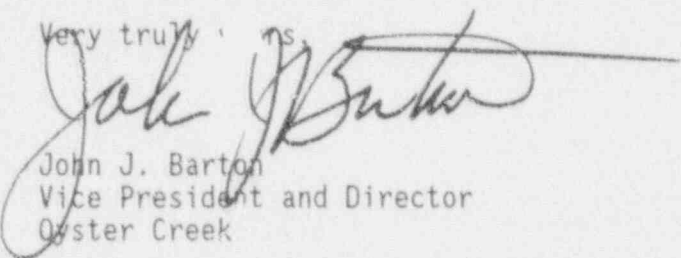
Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 91-39
Reply to a Notice of Violation

In accordance with 10 CFR 2.201, the enclosed provides GPU Nuclear's response to the Notice of Violation identified in NRC's Inspection Report 91-39.

An extension of the due date was discussed with Regional Management on March 6, 1992 and granted until March 31, 1992.

Should you have any questions, please contact Brenda DeMerchant, Oyster Creek Licensing Engineer at 609-971-4642.

Very truly yours,


John J. Barton
Vice President and Director
Oyster Creek

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

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VIOLATION:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained that meet or exceed the requirements of Regulatory Guide (Reg Guide) 1.33, Revision 2, Quality Assurance Program Requirements (Operation). Reg Guide 1.33, Appendix A, recommends that procedures should be provided for the control of equipment (e.g., locking and tagging). Section 4 of Oyster Creek Procedure 108, "Equipment Control" Revision 53, notes that the "... impact of (switching and tagging) outages on current equipment lineups shall be assessed when work has been completed, grounds are cleared, and tags are released," and that "lineups shall not be performed on equipment or portions of systems while they are tagged out for maintenance or modification."

Contrary to the above, appropriate equipment control was not maintained in that system lineups were performed on the emergency service water (ESW) system 1 and 2 on June 3, 1991, and June 8, 1991, respectively, while power supply breakers to the ESW discharge to canal valves (V-3-87 and V-3-88) were tagged and racked out for a modification to remove the valve operators. The lineup was not checked after subsequent removal of the tags. As a result, actual breaker position was contrary to the indicated breaker position on the control room system lineup documentation from June 14, 1991 until January 16, 1992.

This is a severity level IV violation (Supplement 1).

RESPONSE:

GPUN concurs with the violation as stated. The reason for the violation is as follows:

Prior to the removal of tags controlled in outages 91-1492 and 91-1553, a control room operator failed to verify the tagged components "Removed Position". The "Removed Position" as listed on the switching and tagging removal work sheet, should have been checked against the applicable system lineup sheets.

The following corrective action was initiated:

Changes to the Electrical Check Off Lists for Containment Spray Systems 1 and 2 in Procedure 310 were made. The changes corrected the breaker positions for valves V-3-87 and V-3-88.

To avoid further violations, the following corrective actions will be initiated:

- a) Operations management will use this event as a specific example in developing a training lecture which provides expectations related to procedural compliance and attention to detail. This lecture, given by Operations management, will be presented to licensed operators during the current requal training cycle.
- b) Procedure 108 is presently under revision. Training is currently being given on the proposed revision to Procedure 108.
- c) A copy of the Notice of Violation along with the applicable sections of Procedure 108 will be issued as required reading to the appropriate Operations personnel.

Full compliance was achieved on January 16, 1992, when Procedure 310 was temp-changed to reflect the correct position (closed) of the breakers. The temp-change is now incorporated in a permanent revision to procedure 310.