

**GPU Nuclear Corporation**  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey 08731-0388  
609 971-4000  
Writer's Direct Dial Number:

June 1, 1984

Mr. Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Crutchfield:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Torus Modifications Concurrent with Reactor Refueling

Reference: Letter from P. B. Fiedler to D. M. Crutchfield dated  
February 3, 1984

In the above referenced letter (see attachment), the definition of "mechanically intact", as it pertains to the torus, was defined for the work scope in progress to be "the lower portion of the torus shell, up to the normal operating water level, has no openings and is capable of holding water". Items (d) and f) 2) of the reference prohibit maintenance which could result in draining the reactor vessel below the safety limit of 4'8" above the top of the active fuel. Our outage work includes the normal activity of replacement of LPRM instrumentation and the additional activity of replacement of SRM and IRM instrumentation.

Since these activities (SRM, IRM, and LPRM instrumentation replacement) will be proceeding under the same conditions presented in our letter, they have been reviewed as to the possibility of falling under the criteria in (d) and f) 2). It has been determined that they do not. The basis for this conclusion is presented in the safety evaluation performed for the activities of concern and the review of the procedures to be used to control those activities. Adequate administrative and engineering controls will be used such that the work cannot be construed to fall under either category (d) or f) 2).

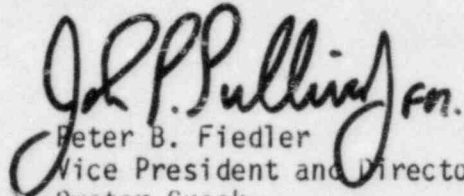
8406070274 840601  
PDR ADDCK 05000219  
P PDR

*Acc 1/10*

Mr. Dennis M. Crutchfield  
U.S. Nuclear Regulatory Commission  
Page 2

The above clarification was discussed with Mr. James Lombardo of your staff on May 30, 1984 prior to initiating subject work activity. In the event that any comments or questions arise, please contact Mr. Michael Laggart of my staff at (201)299-2341.

Very truly yours,

  
Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF:DH:dsm  
Attachment

cc: Dr. Thomas E. Murley, 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