



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 23, 1995

Docket
File

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

SUBJECT: UPDATED FINAL SAFETY ANALYSIS REPORT, REV. 9 (UFSAR) -
OYSTER CREEK NUCLEAR GENERATING STATION

Dear Mr. Barton:

In a letter dated May 19, 1995, you provided the Updated Final Safety Analysis Report (UFSAR), Rev. 9 which discontinued the practice of providing updated reproductions of controlled drawings, (piping and instrumentation diagrams, (P&ID's), electrical single line diagrams, plant arrangements, etc.) as part of the periodic UFSAR update submittals for the Oyster Creek Nuclear Generating Station. Instead, the UFSAR referenced in the text GPUN drawings that are listed in the plant Configuration Control List and, as such are controlled by the GPUN Operational Quality Assurance Plan. The letter also indicated that a safety evaluation concluded that the removal will assure the use of valid drawings with no safety impact.

The scope of the information required to be included in the FSAR submitted as part of the application for an operating license is specified in 10 CFR 50.34(b). Specifically 10 CFR 50.34(b)(2) requires that the FSAR contain a description of the structures, systems and components of the facility in sufficient detail to permit understanding of the system designs and their relationship to safety evaluations. The P&IDs formally included in the UFSAR contribute substantially to the NRC's understanding of the systems, their interfaces, and their relationship to safety evaluations. Therefore, the staff's position is that the information contained in the P&IDs formerly provided in the UFSAR cannot be removed without providing a suitable substitute.

It is the staff's understanding that there is substantial regulatory burden associated with providing these revised P&IDs. This is due to the fact that the P&IDs provided in the FSAR are created solely for the UFSAR and contain, in a different format, information available on the controlled P&IDs used by the plant staff (referred to by GPUN as the Oyster Creek Print Book).

The staff has reviewed GPUN's decision as stated in the referenced letter and believes that it is contrary to the requirements of 10 CFR 50.71(e) and 10 CFR 50.34(b). However, the staff recognizes that creating separate P&IDs solely for inclusion in the UFSAR is an unnecessary regulatory burden. Therefore, the staff can agree with GPUN to substitute other plant drawings for those formerly included in the UFSAR as long as the substitutions were acceptable and were formally submitted to the NRC on the docket. For example, plant-controlled drawings (the print book) can be substituted for UFSAR figures as

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long as the controlled drawings are incorporated in the FSAR by reference, are updated on the same frequency as the UFSAR update and placed on the docket in a similar fashion as the FSAR amendment, and the staff agrees that the controlled drawings were acceptable replacements.

Should you have any additional questions on the staff's position, please do not hesitate to contact me at (301) 415-3473.

Sincerely,

Original signed by:

Alexander W. Dromerick, Senior Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-219

cc: See next page

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Sincerely,



Alexander W. Dromerick, Senior Project Manager
Project Directorate I-4
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cc: See next page

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cc:

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