ENCLOSURE 4

Nuclear

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August 24, 1984

Mr. Richard W. Starostecki
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Starostecki:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Systematic Assessment of Licensee Performance (SALP)
Report No. 50-219/84-19

Your letter of July 10, 1984, provided the SALP Board's assessment of activities at the Oyster Creek Nuclear Generating Station for the period February 1, 1983 to April 31, 1984. Based on our review of your letter and the discussion at our July 23, 1984 meeting, GPUN believes it is appropriate to respond to several functional areas.

Plant Operations and Outage Control

The first item in this functional area to be addressed is timeliness of Licensee Event Report (LER) submittals. We agree that, although the technical content of LERs has been maintained at a high standard with good narrative descriptions and appropriate root cause/corrective action determinations, the timeliness of submittals has continued to be a problem during the assessment period.

Efforts have been undertaken in the recent past to correct this deficiency. Formal training classes have been provided for both operations and site engineering personnel regarding the new 10CFR50.73 LER rule. This has aided in the interpretation of reporting requirements which historically has caused delays in the reporting process. Our administrative procedure is being revised to both recognize the new requirements and place time limitations on each department which has a responsibility in the preparation of an LER. In addition, prior to the SALP report, the timeliness issue was brought to the attention of the Vice President and Director of Oyster Creek and suggested corrective actions were implemented. Over the past several months, the above actions have resulted in a substantial improvement in LERs submitted within the required time frame and a continuing effort will be expended to maintain that improvement.

The second item is control of temporary changes to procedures. The Oyster Creek (site) division has effected changes to their administrative procedure which should address the concerns expressed in the assessment. However, several divisions within GPUN effect changes to those procedures within their area of responsibility, and coordination of the complete corrective action has been somewhat delayed. A response to IE Inspection 84-06 which details the NRC concerns, is presently being formulated and is scheduled for submittal in October of 1984.

Emergency Preparedness

The assessment pointed out that although improved performance was noted in our 1983 emergency drill over the previous year, the improving trend was not continued into the 1984 drill. We agree that some deficiencies do still exist and we are actively pursuing their resolutions, however, we disagree that the improving trend was not continued into our 1984 drill. Listed below is a summary of the effort expended and actions taken, during the past SALP period, to upgrade emergency preparedness at Oyster Creek:

1. Drills

   During this SALP period, eighteen drills, exercises or special training sessions were conducted involving in excess of nine hundred personnel. Of these, eight were shift drills, five were quarterly drills involving full activations of the Emergency Response Organization, two were medical emergency drills, two were special training sessions and one was an annual graded exercise. Two of these drills were unannounced. Many of these involved participation of offsite personnel.

2. Action Items

   Approximately one hundred action items were identified for resolution during this SALP period and tracked on an automated Action Item Tracking System. Eighty-two of the one hundred were resolved and the remainder are ongoing actions, all of which related to improving the Emergency Preparedness Program.

3. Prompt Notification System

   During this period, the installed siren system was upgraded and tested to ensure the ability to notify the public within the established time frames. The quarterly test exceeds the requirement set forth in NUREG 0654 (i.e., each siren is completely tested quarterly) and the last quarterly test revealed no deficiences which is a reliability indicator of one hundred percent. An additional siren was installed to improve coverage and additional tone alert radios were distributed which also exceed regulatory requirements. An NRC inspection of the siren system during this period identified three open items, two of which were resolved and the third will be resolved when Revision 9 to the Emergency Plan is completed.

4. Emergency Facilities

A new Emergency Operations Facility was established outside the ten-mile Emergency Planning Zone during this SALP period which meets the design requirements established in NUREG 0696.

A new Emergency Building was constructed during this period that includes a Technical Support Center (TSC) which will meet design requirements of NUREG 0696. The new TSC should be completed during 1984. The interim TSC is backed up by an alternate TSC to provide for personnel protection until the new TSC is completed.

Southern Ocean County Hospital is being included as a secondary offsite facility to handle contaminated injured personnel. Procedures were developed, equipment provided and training is underway to fully prepare them to respond.

5. Communications

Additions and modifications were made to the existing dedicated Emergency Telephone System to improve transmission quality and system flexibility. Telephone communications in the new EOF were expanded to provide a four-fold increase over the previously existing capability. A completely new telephone system was designed during this period and will be installed prior to the end of 1984 which will further improve the Dedicated Emergency Telephone System.

A dedicated emergency response radio network involving over twenty-five portable and mobile radio sets was installed during this period to provide full and complete coverage of both the Plant and the ten mile Emergency Planning Zone with radio communications. All emergency response facilities now include radio communications back-up capabilities with the Emergency Operations Facility and the Operations Support Center having access to three separate radio networks.

Surveillances on all communication systems have been established which exceed regulatory requirements.

A contractor has analyzed the Forked River Page System in preparation for significant upgrades which are planned for completion prior to the end of 1984. This will provide the means to rapidly contact personnel located and the Forked River site with emergency-related information.

6. Dose Projection Capability

During this SALP period, a computer terminal with direct access to the Met Tower was provided to the Control Room with back-up terminals in the TSC and EOF for rapid development of dose projections during emergencies. This significantly improved the capability to develop protective action recommendations during the first hour of an emergency.

7. Training

A complete revision to the Emergency Plan Training Program was developed during this period. A major effort was conducted to upgrade existing lesson plans and training materials in support of the program. During calender year 1983, more than 110 classes were taught to provide initial and refresher training for over 780 personnel.

Development of an offsite training program was initiated in close coordination with State and County emergency response officials which will become the basic and advanced training program for offsite emergency workers. This will eventually be conducted and maintained by the Ocean County Emergency Management Organization.

Emergency Planning personnel attended several offsite seminars and training courses related to emergency preparedness activities. These sessions were conducted by the Institute of Nuclear Power Operations (INPO), Battelle Corporation, General Electric, etc.

Extensive "night school" on plant systems, emergency procedures, operations, transient analysis and dose assessment was conducted for Emergency Support Directors (senior company officers) beyond the normal Emergency Plan Training requirements.

Training sessions for County Survey Teams and Plant Systems training for State nuclear and radiological engineers was conducted.

Plant orientation tours were conducted for State personnel assigned to perform emergency duties in the State Emergency Operations Center (EOC).

8. Coordination Meetings

Emergency Planning personnel attended several meetings with other Pennsylvania, Maryland and New Jersey utilities to review and exchange information on Emergency Plan related actions. Oyster Creek also meets periodically with the New Jersey Office of Emergency Management, the Bureau of Radiation Protection and Public Service Electric and Gas Company (Salem Nuclear Generating Station) to review and discuss Emergency Plan matters.

Emergency Preparedness is also represented at all meetings of Ocean County Emergency Management Coordinators which are usually held monthly.

Meetings were held with senior NRC Region I officials as a means to identify ways to improve performance and mutual communications during drills or actual emergencies.

9. Actual Event Performance

During this period, three Unusual Events were declared at Oyster Creek and the Emergency Response Organization performed very well in responding to these actual emergencies. One of the three included activation of the Initial Response Organization which performed very well for an extended period of time (over eight hours) in responding to a fire and loss of offsite electrical power.

Outage Technical Support

The first item to be addressed is Corporate Engineering Support. Our corrective actions for the deficiencies noted in the SALP assessment were detailed in submittals dated May 11, 1984, June 15, 1984, and August 9, 1984. For convenience, the submittals are provided as an attachment to this letter.

The second item is the SALP assessment comments regarding the NDE testing on recirculation system piping for intergranular stress corrosion cracking. In paragraph three of section 4.8 you stated, "During Region I review of this testing, a number of problems with licensee's plotting and evaluation of test data were found. Additionally, the testing was not adequate to determine whether any cracking was present."

The plots of ultransonic reflectors and radiographic profiling of the work in question was preliminary data provided to the NRC inspectors at their request for information only. These plots were worksheets generated during initial attempts to substantiate reflector origin by comparing ultrasonic data with actual joint configuration taken from radiographs. The plots were not in any way represented as final plotting of data nor were they the sole basis for final evaluations. Plots to be utilized for final data evaluation were made in accordance with GPUN Inservice Inspection Procedures which require specific forms to be used with appropriate review and concurrence.

Different interpretations of the results of data evaluation between GPUN and the NRC were addressed by GPUN through the procurement of outside NDE experts who were used to provide third and fourth party plotting and evalution of the data. The two NDE consulting service companies used for the service had successfully completed the requirements of NRC Bulletin 82-03. The result of this effort showed substantial agreement between GPUN and the two outside NDE parties on all but three (3) of the welds. In each of those cases, the disagreement was equally split. The differences of opinion were finally resolved through additional augmented inspection techniques developed by GPUN and witnessed by the NRC. The techniques used were above and beyond Code or NRC Bulletin requirements and had not been used before by any other Utility, to our knowledge, for this type of application.

GPUN developed and qualified unprecedented internal inspection techniques capable of performing both visual and liquid penetrant examinations. The results of the augmented inspection validated initial evaluations made by GPUN. With respect to the adequacy of testing and techniques for crack determination, procedures and personnel utilized by GPUN were qualified in accordance with NRC Bulletin 82-03. In addition, inspectors utilized for the Recirculation Piping Inspection were trained and examined by GPUN personnel utilizing samples with known IGSCC indications.

In summary, we believe that the adequacy of the testing conducted to judge and evaluate was never in question. The conclusiveness of the evaluation and the validity of the original judgment was challenged. The numerous steps delineated above which were taken by GPUN validated our original conclusions.

Licensing

We agree that timeliness of licensing submittals has continued to be deficient during this assessment period. A concerted effort is being made, with the cooperation of all divisions within GPUN, to improve in this area. Several administrative steps have already been taken to both improve and emphasize timeliness.

Although timeliness is deficient, we disagree with the Board's assessment with regard to the content of licensing submittals in the areas of SEP and fire protection. In discussions with NRC reviewers regarding SEP submittals, the technical content of a finalized submittal has always been well received and generally remains unchallenged.

With regard to fire protection there were two (2) major Appendix R submittals made during the review period. On September 16, 1983, GPUN submitted a schedule exemption request and on December 16, 1983, GPUN submitted its "Fire Hazards Analysis Report and Appendix R Section III.6 Safe Shutdown Evaluation". Both submittals contained a significant amount of information which addressed very complex regulations.

When dealing with major issues, such as Appendix R, additional information is usually submitted because each reviewer has his own idea of how much and what type of information he needs to make his determination as to whether a utility will meet the regulation.

GPUN held several meetings with the reviewers and had phone conversations which aided in resolving all the concerns.

If you have any questions or comments, please contact Michael W. Laggart, BWR Licensing Manager at (201)299-2341.

Very truly yours,

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Vice President and Director
Oyster Creek

PBF/dam
Attachments

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