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May 11, 1984 RFW-0122

Dr. Thomas E. Murley, Administrator Region 1 U.S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406

Dear Dr. Murley:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Inspection 84-09

During early April, an NRC Inspection Team headed by Mr. L. Tripp, reviewed a number of items at the Oyster Creek Station including the general subject of design and modification control for plant changes made during the current outage. The specific inspection report has not, as of this date, been received by GPUN, however, certain commitments were made at the time of the audit exit meeting by the undersigned and additional commitments were subsequently made in a phone call from Mr. Keimig, Region 1, to Mr. P. R. Clark, GPUNC. The purpose of this letter is to update you regarding the status of these commitments.

At the time of the exit interview, the undersigned agreed to conduct a general technical review of all field change requests (FCR's) required for the modifications to the Scram Discharge Volume System. This review was requested by the NRC Audit Staff based upon the large number of FCR's for this modification. Although each FCR was independently reviewed, residual concerns existed about whether the large number, taken as a whole, impacted the functional design requirements of the system. Such a review has been performed by the modification designer, Stone & Webster, and the results transmitted to GPUN. We are making the Stone & Webster report available to the Oyster Creek NRC Resident Inspector. The Stone & Webster review concludes that the scram discharge modification (i.e., all FCR's) meets the intent of the original performance and design requirements.

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As part of a continuing GPUN effort to look at design control, and expand upon the NRC inspection, the NRC requested that we internally audit an enlarged number of modifications being performed at Oyster Creek. The audit was initiated in early April of this year, and the audit report was received on May 7, 1984. (This audit report is also being made available to the Oyster Creek NRC Resident Inspector.) The audit examined 12 total modifications and represents a spectrum of different design organizations, internal project engineers, and time frames in which the design was conducted. The report contains no specific findings and generally concludes that the modification projects examined are technically consistent with the baseline engineering documents and requirements. The audit report, however, identifies a number of administrative problems, some lack of specific procedural guidance, and inconsistencies in some project engineering judgements. These areas could have the potential for future difficulties and do impact our internal productivity and documentation processes. The balance of this letter discusses and addresses our initial assessment and response to these audit recommendations.

The audit report identifies the fact that changes have been made to original design agent documents, as a result of FCR's, by GPUN without recourse to the original designer. This practice is permitted by GPUN procedures where the required action definition can clearly be evaluated by GPUN. For complex changes, or changes requiring detailed knowledge of the original design calculations, our policy requires review by the original designer. The audit noted a large number of field changes handled by GPUN in this manner and that change documents, once made, were not always distributed back to the original design agent. We believe that the policy of allowing minor changes to be made internally is proper, but find that the number being handled by the internal GPUN project engineer is inconsistent with other duties and responsibilities and that a greater fraction of FCR's should have been referred back to the original designer. We are taking steps to improve the procedural and policy guidance to the engineering staff to require preferential handling by the original design agent. Further steps are being taken to ensure that all change documents and revisions will be routinely distributed to the designer.

A second observation of the GPUN audit is that the number of field change documents should be reduced through increased field walkdowns and constructability reviews prior to completion of the engineering package. We have stressed this with the engineering staff for the last year and a half and believe that most of the problems identified in the audit stem from previous engineering practices or failure, in selective cases, to adhere to current direction. Our internal guidance calls for a walkdown of all jobs both before the start of engineering and during the engineering process; and for preliminary engineering and final engineering constructability reviews. We are reinforcing this direction to the internal engineering staff as well as to our engineering

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contractors, and are putting in place administrative checks at the site to be able to monitor such activities. We have considered this practice essential to assure the adequacy of initial engineering efforts and are continuing to stress the implementation of job walkdowns.

A third general recommendation of the audit is the reinforcement on ensuring all documentation is transmitted to and through our Engineering Documentation and Control Center (which provides a computerized document data base) and ensuring that Architect/Engineer's or other design agents have either computer access or some other reliable access to that data base. We are continuing to emphasize, and our procedures require, release of all engineering documents through the Engineering Documentation and Control Center. We believe most of the identified problems in the audit stem from work performed prior to or in the early formulative stages of GPUN, i.e., under the direction of previous JCP&L Generation Division. In addition, some audit observations may reflect some misunderstandings on the part of the audit team. Nevertheless, we are reviewing each of the documentation problems identified in the audit to see if generic problems exist with the current control process. We had previously notified our major engineering contractors in a letter dated October 4, 1983, that we wish them to acquire computer facilities to tie in to our central data files. Two major contractors have acquired such terminals and will be connected in one to two months. Additional engineering contractors are still internally reviewing this action. We plan to reiterate to our contractors the need for such access.

The fourth area identified by the audit, as well as by previous internal reviews, is that fact that a large number of change documents can be outstanding against a drawing or specification. While this permits design modification control, if the numbers become too large it becomes unwieldy and time consuming for field construction and quality control. We are moving to change our procedures to ensure systematic release of original engineering as well as to limit the number of change documents outstanding against any one type of engineering document. This will still permit the needed flexibility in the system, yet restrict numbers of change documents prior to requiring a revision.

The audit also commented upon the completeness of design modification packages at the completion of work. We are reviewing our current practices but believe that existing procedures which require the development of such modification packages (on the CARIRS data base) is proper and the preferred approach for permanent record retention. We are, however, examining procedures in detail to see if minor modifications are warranted. The inconsistencies identified in the audit are being reviewed but most are thought to result from earlier projects performed to procedures in place prior to the implementation of the current GPUN design control process.

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Specific ongoing reviews are also being conducted relating to specific technical observations raised in the audit; the recommendation to review in detail two additional projects, i.e., Budget Activity 402052, "Containment Pressure, Water Level and Hydrogen Monitor Systems," and Budget Activity 402024, "Appendix J Containment Leak Rate Modifications;" and observations relating to regulatory notifications.

I would be happy to meet with you to discuss the attachments or planned internal policy changes should you so desire.

Very truly yours,

R. F. Wilson

Vice President, Technical Functions

RFW/al

cc: P. R. Clark

P. B. Fiedler

R. L. Long

F. F. Manganaro

NRC Resident Inspector, Oyster Creek Nuclear Generating Station, Forked River, New Jersey 08731

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