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May 24, 1984

Thomas T. Martin, Director
Division of Engineering and
Technical Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection 84-05-Response to Items of Concern

The purpose of this submittal is to make you aware of our disposition to the three (3) items of concern identified in the subject inspection. The areas of concern, and the responses are as follows:

1) (219/84-05-01) Include in the emergency plan a brief outline of the meteorological monitoring program with appropriate reference to the complete description in FSAR section 2.3.3 (revise this FSAR section as necessary).

Response

A brief description of the on-site meteorological monitoring system shall be included in the Oyster Creek Emergency Plan, revision 9, currently being prepared. The Oyster Creek FSAR is in the process of being updated. The updated FSAR will include a description of the meteorological monitoring program. Once finalized, the Emergency Plan will then be revised to include a reference to the appropriate section of the FSAR.

2) (219/84-05-02) State, in a letter to Region I, whether the primary and backup meteorological monitoring systems conform to the guidelines established in Regulatory Guide 1.23, Rev. 1 or justify any exceptions.

Response

The revision to Reg. Guide 1.23 referred to above is a draft document; therefore, GPU Nuclear has not committed to adhering to its

proposed guidance. However, the meteorological monitoring system at Oyster Creek does conform to guidance established in 1.23 Rev. 1 with the following exceptions:

1. Proposed Reg. Guide 1.23, Rev. 1 recommends that for open lattice towers, wind instrumentation should be located a minimum of two tower widths from the edge of the tower. Instrumentation on the Oyster Creek tower are currently located approximately 1.5 tower widths from the edge of the tower.

   GPU Nuclear consulted Gerald C. Gill, Professor Emeritus of Atmospheric Science and Vice President of R. M. Young Co. regarding this matter.

   Professor Gill is a noted expert in the field of meteorology who has conducted experimentation regarding wind sensor placement on lattice type towers. A paper he co-authored entitled "Accuracy of Wind Measurements on Towers or Stacks" which appeared in the September 1967 issue of the American Meteorological Society Bulletin summarizes related experiments.

   Photographs of the Oyster Creek tower were sent to Professor Gill who concluded that it is a light density open lattice tower. For such towers, Professor Gill believes that extending the instruments from 1.5 to 2 tower widths is not necessary.

   We feel that the current placement of instruments on the Oyster Creek Tower meets the intent of Reg. Guide 1.23 Rev. 1 in that they are placed to minimize interference from the supporting tower.

2. Reg. Guide 1.23 Rev. 1 recommends that a second "backup" structure be instrumented to provide meteorological data, if data from the Primary Tower were unavailable. The Oyster Creek Tower is equipped with redundant instrumentation at the 33 and 380 foot elevations. These completely redundant collection systems are used as a backup, which we believe meets the intent of 1.23 Rev. 1 in providing a reliable alternative source of data. This approach was discussed during the NRC inspection of 1/7/82 with your Mr. J. Levene who agreed.

3. Proposed Reg. Guide 1.23 Rev. 1 recommends that meteorological monitoring systems at sites with complex terrain or coastal sites include supplementary Met. towers to determine effects of local complex Met. conditions on plume transport. We are currently in the process of evaluating the need for additional monitoring locations and effects of coastal meteorological conditions (i.e., Sea Breeze on plant releases).

3) (219/84-05-03) Adopt the standard technical specifications for the meteorological monitoring program.

Response

We have reviewed the standard technical specifications for meteorological monitoring programs and intend to meet the intent of them with the following provisions:

1. They will not be implemented until the control room strip chart recorders for Met. data are either repaired (line loss problem) or replaced by the computer readout in the adjacent computer room.

2. Channel checks are defined as visual observations of data displayed from Met. instruments of similar purpose.

3. Instrumentation levels be changed to 33 and 380 ft. elevations.

Should you have any further concerns in this area, please contact Mr. Michael Laggart, BWR Licensing Manager at (201)299-2341.

Very truly yours,

Peter B. Fiedler
Vice President & Director
Oyster Creek

PBF:BH:dam

cc: Dr. Thomas E. Murley, Administrator
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