

APR 29 1992

Docket No. 50-219

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

Dear Mr. Barton:

SUBJECT: MANAGEMENT MEETING TO DISCUSS THE OYSTER CREEK
RESPONSE LETTER ADDRESSING THE THREE NOTICES OF
VIOLATION (NOVs) IN REPORT 50-219/91-29, RECIRCULATION LOOP
ISOLATION EVENT

This letter refers to the management meeting held at the NRC Region I office in King of Prussia, Pennsylvania, on March 23, 1992. The meeting was convened, as suggested by your letter dated January 31, 1992, to better understand the basis for your views in dispute of some of the violations identified in NRC Inspection Report No. 50-219/91-29.

NRC Inspection Report No. 50-219/91-29 identified three violations of NRC requirements: Violation A concerned the adequacy of corrective actions for a previous event; Violation B concerned the operators removing both Isolation Condensers (ICs) from service; and Violation C concerned instances of procedural noncompliance. Mr. Levin and other members of your staff gave a presentation describing the facility's perspective on each violation. Based on the discussions held with your representatives, we have determined that Violation B will be retracted. At the meeting, your staff committed to provide us with: (1) the results of your review of IC system operability with respect to reactor water level; and (2) any related changes to the Technical Specifications dealing with IC system operability requirements during cooldown/shutdown at Oyster Creek. The NRC staff also agreed to retract Parts 1 and 2 of Violation C. The enclosed meeting summary describes your responses and the NRC staff's resolution to the violations.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the attachments will be placed in the NRC Public Document Room. The responses requested by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96-511.

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Mr. John J. Barton

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Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By:
Marvin W. Hodges

Marvin W. Hodges, Director
Division of Reactor Safety

Enclosure: Meeting Summary w/Attachments 1 and 2

Attachment 1: Facility Presentation

Attachment 2: Meeting Attendees

cc w/encl:

M. Laggart, Manager, Corporate Licensing
G. ... Licensing Manager, Oyster Creek
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
K. Abraham, PAO (2)
NRC Resident Inspector
State of New Jersey

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Mr. John J. Barton

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bcc w/encl:

Region I Docket Room (with concurrences)

Management Assistant, DRMA (w/o encl)

M. Hodges, DRS

DRS SALP Coordinator

DRSS SALP Coordinator

L. Bettenhausen, DRS

J. Joyner, DRSS

E. Wenzinger, DRP

R. Conte, DRS

W. Ruland, DRP

R. Lobel, OEDO

A. Dromerick, NRR/PD 1-4

J. Lieberman, OF

F. Young, SRI, Three Mile Island

L. Rossbach, SRI, Beaver Valley

D. Holody, ORA

S. Hansell, DRS

DRS Files (2)

RI:DRS

Hansell/dmg/ajk

Sub 4/14/92
04/14/92

RI:DRS

Conte

CC
04/27/92

RI:DRS

Bettenhausen

MS
04/27/92

RI:DRS

Hodges

MWA
04/27/92

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MEETING SUMMARY

1.0 OBJECTIVE

The objective of the meeting was to determine whether Oyster Creek management provides a framework for safe plant operation through adherence to carefully developed operating procedures and through the adequate resolution of procedure conflicts in accordance with administrative procedures. The framework for this determination was a discussion of Oyster Creek's response (GPUN letter dated January 31, 1992) to the Notices of Violation (NOVs) contained in NRC Report No. 50-219/91-29.

2.0 SUMMARY

The violations, Oyster Creek's responses to the violations, and the NRC's reply to Oyster Creek's responses are summarized below. The licensee's presentation is contained in Attachment 1. Attachment 2 lists the meeting attendees.

NOV A: Corrective actions from a previous plant event were not effective in preventing a repetition of a similar event.

- Oyster Creek concurred with the violation. A new cooldown procedure has been written to resolve the past procedure conflicts.
- The NRC staff accepted Oyster Creek's response to NOV A. However, the staff questioned why the periodic review or actual use of procedures didn't identify these problems.

NOV B: Both Isolation Condensers (ICs) were removed from service even though plant conditions required the ICs to be operable.

- Oyster Creek did not concur with the violation. They disagreed with the NRC staff's interpretation of two Technical Specifications (TS) cited in the violation, TS 3.8.D in conjunction with 3.0.A. IC Technical Specification 3.8.D does not specify a time limit to take the actions needed if both ICs are inoperable. Therefore, specification 3.0.A is applicable, requiring the plant to be in a cold shutdown condition within 30 hours. Licensee representatives stated that when both ICs were taken out of service the plant cooldown was in progress and was completed within 30 hours. Oyster Creek described that they raise reactor water level above the IC steam penetration, when placing shutdown cooling in operation, to prevent stratification in the reactor core region. This situation is apparently not identified in the applicable TS. The facility also stated that they had not violated the IC Operating Procedure 307 for similar reasons.
- The NRC staff agreed to retract violation B based on the content of the applicable Technical Specification and the additional information presented by Oyster Creek. However, the staff expressed concern that TS 3.0.A was being interpreted too

broadly. Therefore, the staff asked Oyster Creek to review IC Operating Procedure 307 to ensure that the directions in Procedure 307 do not conflict with those contained in other operating procedures. Further, Oyster Creek also agreed to submit to the NRC staff any necessary changes to either TS or the TS bases to address the transition situation in (IC cooling to shutdown cooling).

NOV C, Part 1: Plant operators did not follow the requirements of Station Procedure 107, "Procedure Control," which directs operators to revise procedures if they are determined to be inadequate.

- Oyster Creek did not concur with violation C, Part 1. They stated that Procedure 107 was not applicable because plant personnel resolved any apparent procedure conflicts. Therefore, the operators believed that revising the procedures was not necessary.
- After hearing the facts and circumstances involved, the NRC accepted Oyster Creek's response to Part One. This part of the violation is retracted.

NOV C, Part 2: Operators failed to follow the Shutdown Cooling system operating procedure.

- Oyster Creek did not concur with violation C, Part 2. They recognized that the procedure could have been more precise, but the procedure was followed.
- The NRC agreed to retract Part 2 of violation C. The new integrated cooldown procedure and improved system operating procedures should provide the operators with clear guidance to operate the shutdown cooling system.

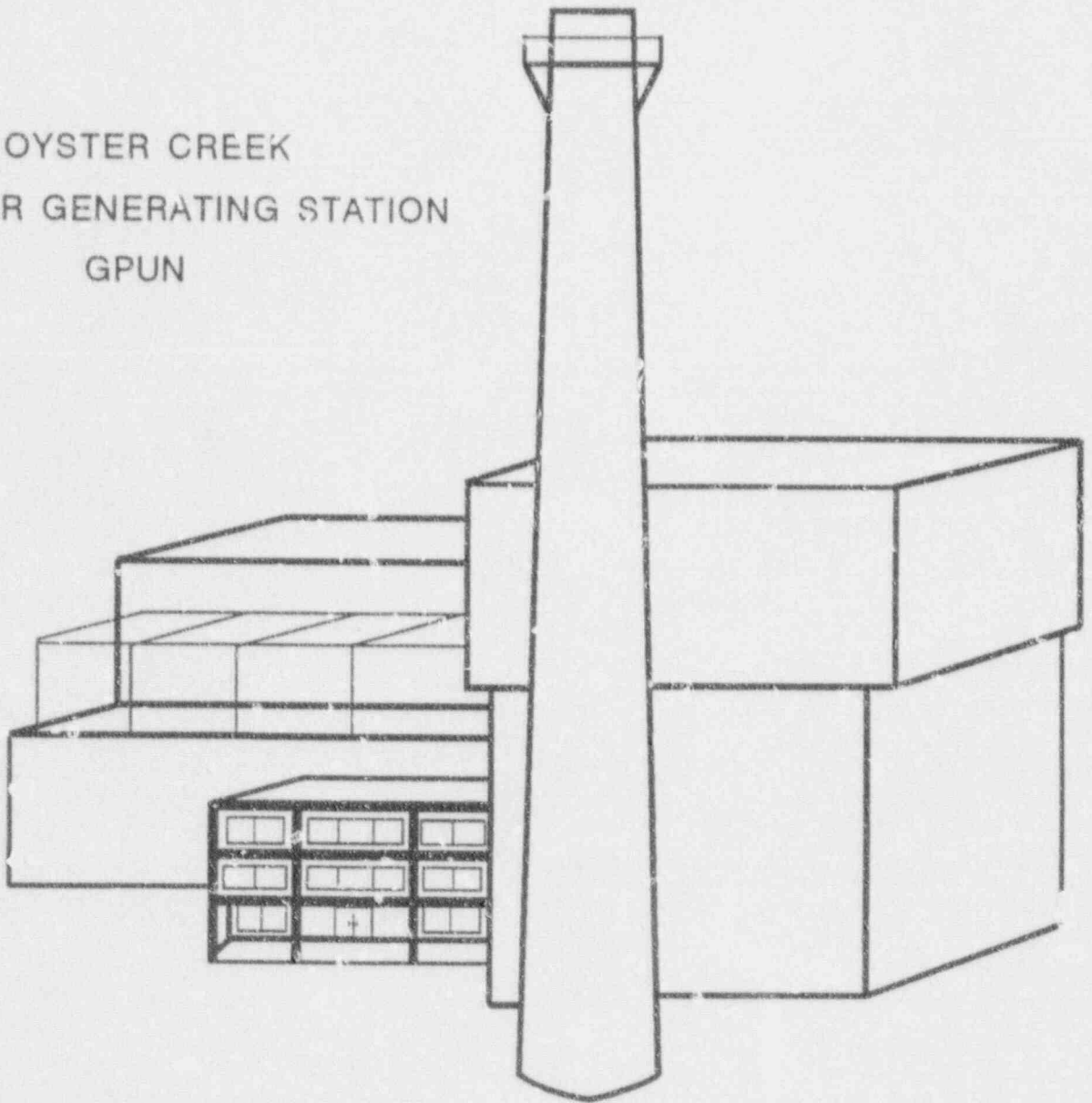
NOV C, Part 3: Operators failed to follow procedure requirements to maintain at least one recirculation discharge valve open, with reactor coolant temperature greater than 212 degrees F.

- Oyster Creek concurred with Part 3 of violation C, as stated.
- The NRC accepted Oyster Creek's response to Part 3 of violation C.

3.0 CONCLUSION

Based on the discussions between the NRC staff and the facility representatives, the staff determined that Violation B would be retracted. The facility agreed to review and revise IC Procedure 307 and associated IC TS as necessary. Also, the NRC staff agreed to retract Parts 1 and 2 of Violation C on the basis of the facts presented. The NRC staff concluded that Oyster Creek management provides a framework for safe plant operation through adherence to approved plant procedures. Both parties agreed that the meeting had been mutually beneficial.

OYSTER CREEK
NUCLEAR GENERATING STATION
GPUN



GPU NUCLEAR CORPORATION
MANAGEMENT MEETING
MARCH 23, 1992

OYSTER CREEK NUCLEAR GENERATING STATION
RECIRCULATION LOOP VALVE CLOSURE

Presentation to the USNRC

March 23, 1992

AGENDA

- c INTRODUCTION

- o CHRONOLOGY OF EVENTS

- o DISCUSSION OF VIOLATIONS
IR 50-219/91-29 A, B, and C

- o SUMMARY

CHRONOLOGY
of
EVENTS

THURSDAY 4/22/91

0305 "A" CONDENSATE PUMP TRIPS

- Reactor Scrams
- Reactor Isolates

0320 UNUSUAL EVENT DECLARED

- Operators stabilize plant

0400 COOLDOWN COMMENCED via ISOLATION CONDENSERS

0800 SHIFT TURNOVER

- Plant Stable as Follows:
 - Reactor Pressure 178 psig
 - Reactor Water Level 156" TAF
 - Reactor Water Temp. 350 degrees F
- Post Transient Review Group (PTRG) Convened
- GSS established cooldown plans:
 - Isolation Condensers, then
 - Shutdown Cooling

THURSDAY 8/22/91 (cont.)

0944 BOTH ISOLATION CONDENSERS REMOVED FROM SERVICE
GSS TAKES STEPS TO ELIMINATE CONTROL ROOM
DISTRACTIONS

1011 REACTOR WATER TEMPERATURE 286 DEGREES F
"A" RECIRC LOOP DISCHARGE VALVE GIVEN CLOSE SIGNAL.

1012 ALL RECIRC LOOPS IN IDLE CONDITION

1013 "A" RECIRC LOOP DISCHARGE VALVE GIVEN OPEN SIGNAL

1030 OPERATIONS DIRECTOR INTERVIEWS GSS and LCRO

1115 REACTOR WATER TEMPERATURE 212 DEGREES F

1200 OPERATIONS DIRECTOR BRIEFS OPERATING CREW

THURSDAY 8/22/91 (cont.)

1600 SHIFT TURNOVER

- Plant stable as follows:
 - Reactor pressure - 65 psig
 - Reactor water level - 199" TAF
 - Reactor water temperature - <212 F

1630 ONCOMING CREW RECEIVES REQUIRED BRIEFING

1712 REACTOR PRESSURE REMAINS AT 65 PSIG

- Operators begin lowering level

1755 ISOLATION CONDENSER VENT PATH OPENED

1802 REACTOR PRESSURE 0 PSIG

- MSIV's opened
- Cold shutdown achieved

FRIDAY 8/23/91

0030 ONCOMING CREW RECEIVES REQUIRED BRIEFING

1208 ALL RECIRC PUMPS RETURNED TO SERVICE

1423 BOTH ISOLATION CONDENSERS IN STANDBY READINESS
OPERATIONS CRITIQUE 2100-91-023 ISSUED

- Root cause: Failure to adequately review the procedure and perform as specified.

SATURDAY 8/24/91

0030 ONCOMING CREW RECEIVES REQUIRED BRIEFING

POST TRANSIENT REVIEW GROUP RESTART REQUIRED
ACTIONS COMPLETE

OPERATIONS CRITIQUE RESTART REQUIRED ACTIONS
COMPLETE

REACTOR RESTART AUTHORIZED

1855 COMMENCED REACTOR STARTUP

DISCUSSION
of
VIOLATIONS

VIOLATION A

1. Procedures were not revised based on the June 12, 1985 event.
2. Placards mounted on Panel 3F were not updated when Technical Specification Amendment #135 was approved.

GPUN RESPONSE TO VIOLATION A

GPUN concurs with the violation as written.

VIOLATION B

Isolation Condensers were not operated in accordance with Technical Specifications.

GPUN RESPONSE TO VIOLATION B

GPUN does not concur with the violation, for the following reasons:

1. Technical Specification 3.8.A was not satisfied with Isolation Condensers removed from service.
2. Limiting Condition for Operation (Technical Specification 3.8.D) required a reactor shutdown.
3. The required shutdown was in progress.
4. Approved, controlled procedures were followed.

VIOLATION C

1. Administrative Procedure 107 was not followed when the GSS failed to revise procedures.
2. Shutdown Cooling Procedure 305 was not followed when level was lowered below 185" TAF.
3. The requirement to maintain one recirc loop open with temperature above 212 F was not met.

GPUN RESPONSE TO VIOLATION C

GPUN concurs with the violation, as clarified below:

Part 1: Violation misquotes Procedure 107. Requirements of Procedure 107 were satisfied on August 22, 1991.

Previous experiences with Procedures 305 and 307 were successful.

New procedure issued to better coordinate cooldown activities.

Part 2: No violation of Procedure 305 occurred.

Reactor was not vented. Level restriction did not apply.

Part 3: No clarification required.

ATTACHMENT 2

Meeting Attendees

General Public Utilities

S. Dietz, Senior Public Affairs
G. Busch, Manager, Oyster Creek Licensing
R. Barrett, Director, Oyster Creek Operations
P. Czaya, Licensing Engineer
L. Geydos, Supervisor, Operations Engineer
S. Levin, Director, Operations and Maintenance
J. Rogers, Senior Licensing Engineer

Nuclear Regulatory Commission

M. Hodges, Director, Division of Reactor Safety
L. Bettenhausen, Chief, Operations Branch, DRS
A. Dromerick, Project Manager, PD1-4, NRR
R. Conte, Chief, BWR Section, DRS
W. Ruland, Chief, Projects Section 4B, DRP
D. Vito, Senior Resident Inspector, Oyster Creek
S. Hansell, Operations Engineer
P. Patniak, Reactor Engineer
T. Fish, Senior Operations Engineer