

ENCLOSURE 1

NOTICE OF VIOLATION

GPU Nuclear Corporation  
Oyster Creek Nuclear Generating Station

Docket No. 50-219  
License No. DPR-16

During an NRC inspection conducted February 23, 1992, - March 28, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990), the violation is listed below:

Section 50.47(b)(8) of 10 CFR Part 50, requires the licensee to have adequate emergency response facilities and equipment to support the emergency response provided and maintained. A June 12, 1984, Confirmatory Order requires the licensee to comply with the commitments as stated in the April 15 and July 19, 1983, and the March 9, and April 9, 1984, correspondence in response to commitments on emergency response capability schedules. The habitability of the technical support center (TSC) was described as meeting the requirements of Standard Review Plan (SRP) 6.4, "Control Room Habitability System," as they pertain to control rooms, with the exception of automatic actuation, seismic and redundancy criteria. SRP 6.4, section 6.4-II.3, specifies that the ventilation shall be tested on an 18 month frequency. Specifically, the TSC ventilation system was to be tested to verify that system makeup was  $\pm 10\%$  of the design value, and that the TSC can be pressurized to at least  $1/8$  inch water gage while making up at the designed rate.

Contrary to the above requirements to maintain and test the TSC ventilation system, adequate maintenance and testing was not conducted since completion of construction of the TSC in 1985 until December 1991. This was evident by the degraded condition of the TSC ventilation system discovered during testing in November and December 1991.

This is a Severity Level IV violation (Supplement VIII).

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of your receipt of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown consideration will be given to extending the response time.

Dated at: King of Prussia, PA  
this 8th day of May 1992

ENCLOSURE 2

GPUN's Enforcement Conference Presentation of April 30, 1992

Attendance

**GPU Nuclear Corporation**

John Barton	Vice President and Director
Bill Behrle	Director, Site Tech Functions
Thomas E. Quintenz	Manager, Maintenance Assessment
Chris Lefler	Manager, Site Tech Functions
George Busch	Manager, Site Licensing
Brenda DeMerchant	Licensing Engineer

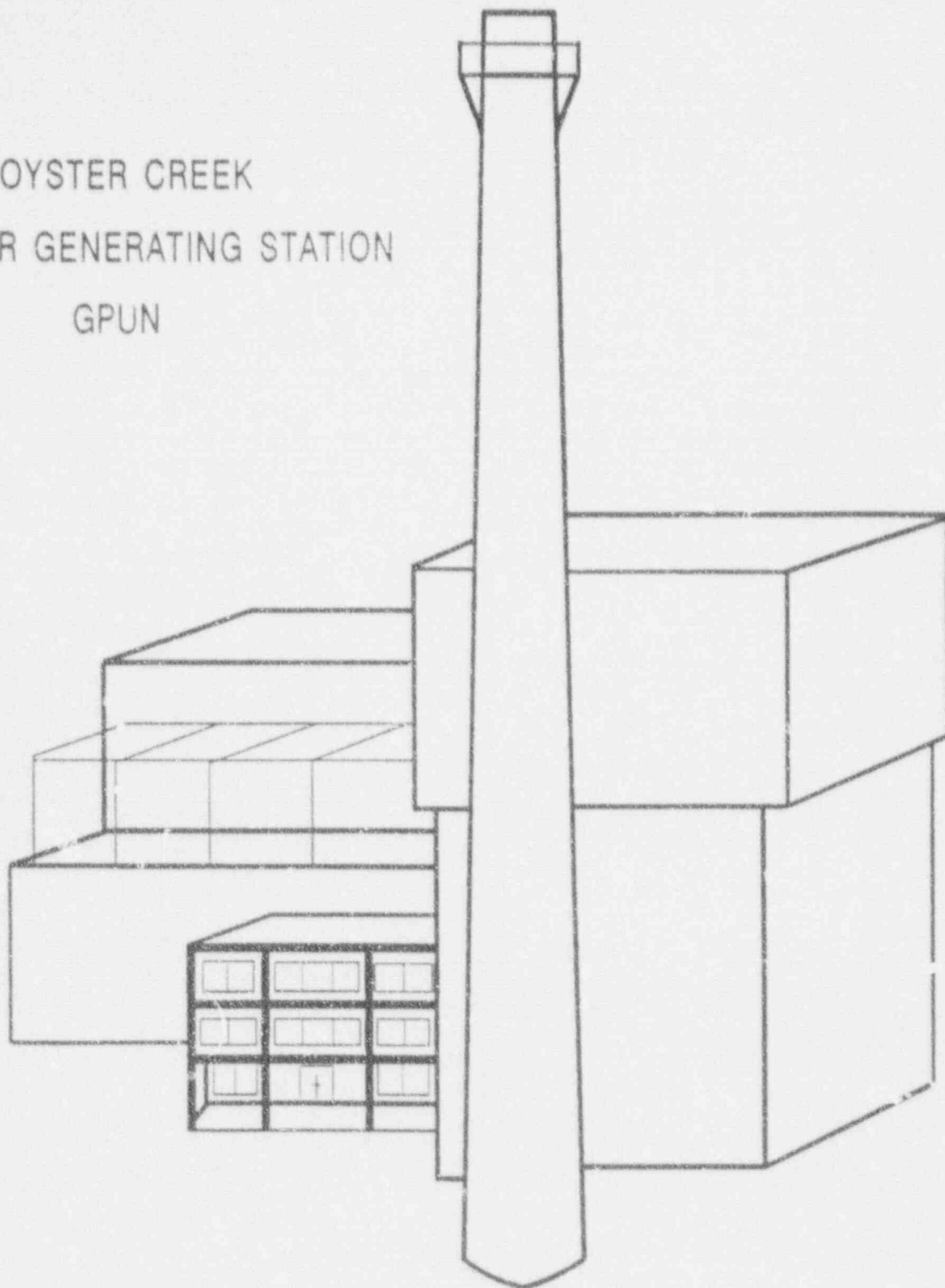
**US Nuclear Regulatory Commission (NRC)**

Susan F. Shankman	Acting Deputy Director, Division of Reactor Projects (DRP)
Edward C. Wenzinger	Branch Chief, DRP
A. Randolph Blough	Branch Chief, DRP
William H. Ruland	Section Chief, DRP
Craig Gordon	Senior EP Specialist, Division of Reactor Safety and Safeguards (DRSS)
Timothy Frye	Reactor Engineer, DRP
Maitri Banerjee	Resident Inspector/Acting RSLO
Lonny Eckert	EP Specialist, DRSS
John H. Lusher	EP Specialist, DRSS
F. Jeff Laughlin	EP Specialist, DRP
David J. Vito	Senior Resident Inspector
John A. Nakoski	Resident Inspector
Alexander Dromerick	NRR Project Manager
Ted Easlick	Enforcement Specialist

**NEW JERSEY BNE**

David Vann	NJ BNE
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OYSTER CREEK  
NUCLEAR GENERATING STATION  
GPUN



GPU NUCLEAR CORPORATION  
ENFORCEMENT CONFERENCE  
APRIL 30, 1992

## AGENDA

INTRODUCTION

J. BARTON  
(VICE PRESIDENT  
& DIRECTOR)

VIOLATION

B. BEHRLE  
(TECH FUNCTIONS  
SITE DIRECTOR)

- DESCRIPTION
- MAINTENANCE HISTORY
- IMMEDIATE CORRECTIVE ACTION
- ROOT CAUSE DETERMINATION
- LONG TERM CORRECTIVE ACTION
- SAFETY SIGNIFICANCE
- MITIGATING FACTORS

NUREG 0737 SUP. 1  
CONFIRMATORY ACTION  
LETTER COMPLIANCE

G. BUSCH  
(MANAGER  
LICENSING)

CONCLUDING REMARKS

J. BARTON

## DESCRIPTION

THE LACK OF MAINTENANCE AND TESTING OF THE OYSTER CREEK TECHNICAL SUPPORT CENTER VENTILATION SYSTEM WAS IDENTIFIED AS AN APPARENT VIOLATION OF NRC REQUIREMENTS IN NRC INSPECTION REPORT NO. 50-219/92-04, SPECIFICALLY:

- ° THE LACK OF SYSTEM MAINTENANCE UNTIL DECEMBER 1991, AS REQUIRED BY 10 CFR 50.47(B)(8)
  
- ° FAILURE TO PERFORM THE PERIODIC TESTING SPECIFIED BY SRP 6.4 AS REQUIRED BY THE JUNE 12, 1984 CONFIRMATORY ORDER.

## MAINTENANCE HISTORY

- ° A CONTINUING SERVICES CONTRACT HAS BEEN IN-PLACE TO INSPECT AND MAINTAIN THE HEATING, VENTILATING AND AIR - CONDITIONING EQUIPMENT IN THE SITE EMERGENCY BUILDING (INCLUDING THE TSC) ON A BIMONTHLY SCHEDULE SINCE 1986.
  
- ° TSC VENTILATION SYSTEM PERFORMANCE TESTING WAS DONE THREE TIMES SINCE THE BUILDING WENT INTO OPERATION.
  - ° JANUARY 1984 THROUGH JANUARY 1985 (INITIAL TESTING)
  - ° DECEMBER 1987 (SU&T PERFORMED THE TESTING)
  - ° NOVEMBER 1991 THROUGH MARCH 1992

## IMMEDIATE CORRECTIVE ACTIONS

- ° ASSESS EXISTING CONDITIONS AND DETERMINED THE TSC REMAINED OPERABLE RELATIVE TO DBA CRITERIA.
- ° DETERMINED NECESSARY TEST REQUIREMENTS.
- ° COMPLETED REQUIRED TESTING OF THE TSC VENTILATION SYSTEM.
- ° INSTALLED A CONTINUOUS AIR MONITOR IN THE TSC.
- ° REVIEWED OTHER NUREG 0737 ACTIVITIES TO ASSURE SIMILAR COMPLIANCE ISSUES DO NOT EXIST.
- ° REVIEWED ALL OUTSTANDING INCOMPLETE WORK LIST ITEMS (IWL'S) TO ASSURE SIMILAR ITEMS DO NOT EXIST.
- ° PERFORMED ROOT CAUSE DETERMINATION

## ROOT CAUSE DETERMINATION

- ° THE SPECIFIC ASPECTS OF THE REGULATORY REQUIREMENTS THAT APPLIED TO THE TSC VENTILATION SYSTEM WERE NOT CLEARLY DEFINED IN THE PROJECT DOCUMENTATION AT THE BEGINNING OF THE PROJECT.
  
- ° A COMPREHENSIVE LIST OF SURVEILLANCE TESTS NECESSARY TO ASSURE COMPLIANCE WITH THE REGULATORY REQUIREMENTS WERE NOT IDENTIFIED AND DOCUMENTED AT THE BEGINNING OF THE PROJECT.



## ROOT CAUSE CONTRIBUTING FACTORS

- THE INCOMPLETE WORK LIST OVERDUE COMMITMENT DATES DID NOT RECEIVE APPROPRIATE ATTENTION, EVEN THOUGH THEY ARE REVIEWED ON A MONTHLY BASIS.
  
- THE SITE EMERGENCY BUILDING WAS A MAJOR PROJECT WITH LOW VISIBILITY RELATIVE TO PLANT ACTIVITIES SINCE IT HAD A MINIMAL INTERFACE WITH PLANT SYSTEMS.
  
- THE TSC VENTILATION SYSTEM WAS OVERSHADOWED BY THE LARGE AMOUNT OF SEB CONSTRUCTION DEFICIENCIES UNRELATED TO THE TSC.
  
- AN SDD DIVISION 2 WAS NOT DEVELOPED FOR THIS PROJECT.

### LONG TERM CORRECTIVE ACTIONS

- ° ESTABLISH THE COMPREHENSIVE LIST OF TEST REQUIREMENTS, ACCEPTANCE CRITERIA AND FREQUENCIES OF PERFORMANCE
- ° PUT INTO PLACE THE PROCESS TO PERFORM TESTING TO ASSURE THE TSC REMAINS FUNCTIONAL.
- ° THE MODIFICATION TURNOVER PROCEDURE (124) IS BEING REVISED TO PLACE GREATER RESTRICTIONS ON INCOMPLETE WORK LIST ITEMS

### PROGRAMMATIC DESIGN PROCESS CHANGES (POST TSC DESIGN)

- ° THE ESTABLISHED MODIFICATION PROCESS NOW REQUIRES IN DEPTH SYSTEM DESIGN DESCRIPTION DIVISIONS 1&2 WHICH DEFINE IN DETAIL THE DESIGN CRITERIA AND MAINTENANCE / SURVEILLANCE REQUIREMENTS.
- ° THE REQUIREMENT FOR PROJECT REVIEWS, IN THE FORM OF PRELIMINARY ENGINEERING DESIGN REVIEW MEETINGS AND OPERABILITY, MAINTAINABILITY, CONSTRUCTABILITY REVIEW MEETINGS REINFORCES THE ESTABLISHMENT AND UNDERSTANDING OF MAINTENANCE AND SURVEILLANCE REQUIREMENTS.

## SAFETY SIGNIFICANCE

- VENTILATION SYSTEM WAS DEGRADED, HOWEVER FACILITY REMAINED FUNCTIONAL.
- CALCULATIONS DEMONSTRATED DOSES WITHIN ACCEPTABLE BOUNDS.
- FACILITY WAS FUNCTIONAL FOR ALL DESIGN BASIS EVENTS.
- SAFETY SIGNIFICANCE IS MINIMAL AS RECOGNIZED IN THE INSPECTION REPORT.

## MITIGATING FACTORS

- SELF IDENTIFIED
- IMMEDIATE CORRECTIVE ACTION WAS INITIATED TO PROVIDE FOR THE DEGRADED CONDITION EVEN THOUGH FACILITY WAS FUNCTIONAL.
- CURRENT PRACTICES PRECLUDE SUCH EVENTS IN THE FUTURE.

CONFIRMATORY ACTION LETTER COMPLIANCE

<u>ORDER DATED</u>	<u>ISSUES COVERED</u>	<u>STATUS</u>
6/17/83	• PASS ACCIDENT SAMPLING SYSTEM (PASS)	INSTALLATION COMPLETED DURING IOR.
		MODIFICATION OF ORDER 4/29/85 TO ADDRESS OPERABILITY CONCERNS.
	• ISOLATE PURGE AND VENT VALVES ON HIGH RADIATION SIGNAL	COMPLETED FOR LARGE CONTAINMENT VENT AND PURGE VALVES DURING IIR. NOT NEEDED FOR SMALL VALVES (2 INCH).
		ACCEPTED BY NRC PER CORRESPONDENCE DATED 3/5/87.
6/12/84	• SPDS	
10/6/86	• GRANTED EXTENSION FOR COMPLETION DATE OF SPDS	CLOSED (IR 90-16)

<u>ORDER DATED</u>	<u>ISSUES COVERED</u>	<u>STATUS</u>
6/12/84 (CONT'D)	● CONTROL ROOM DESIGN REVIEW	COMPLETE PER NRC LETTER DATED 6/28/90.
	● REG GUIDE 1.97 APPLICATION TO EMERGENCY RESPONSE FACILITIES	IR 91-23 DATED 9/26/91 IDENTIFIED ONE DEVIATION NOT RELATED TO ERF'S.
	● UPGRADE EMERGENCY OPERATING PROCEDURES (EOPS)	INSPECTIONS PERFORMED 9/88, 4/91, AND 1/92. URI IDENTIFIED CONCERNING SUPPORT PROGRAM.
	● EMERGENCY RESPONSE FACILITIES <ul style="list-style-type: none"> <li data-bbox="478 976 634 1009">● TSC</li> <li data-bbox="478 1053 634 1087">● OSC</li> <li data-bbox="478 1125 1136 1158">● EMERGENCY OPERATIONS FACILITY</li> </ul>	COMPLETE PER NRC LETTER DATED 3/3/86 (HOWEVER NO ERF APPRAISAL WAS DONE).
7/15/86	● CONTROL ROOM HABITABILITY	COMPLETE EXCEPT FOR OPEN ISSUE ON THYROID DOSE.