



GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

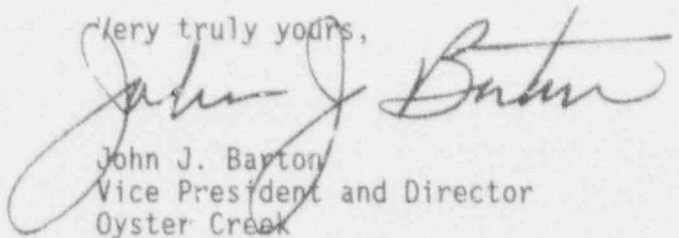
Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 92-04
Reply to a Notice of Violation

In accordance with 10 CFR 2.201, the enclosed provides GPU Nuclear's response to the Notice of Violation identified in NRC's Inspection Report 50-219/92-04.

Should you have any questions, please contact Brenda DeMerchant, Oyster Creek Licensing Engineer at 609-971-4642.

Very truly yours,



John J. Barton
Vice President and Director
Oyster Creek

JJB/BDEM:jc
cc: Administrator, Region 1
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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Violation:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained that meet or exceed the recommendations of Regulatory Guide (Reg Guide) 1.33, revision 2, Quality Assurance Program Requirements (Operation). Reg Guide 1.33, Appendix A, recommends that procedures should be provided for the operation of safety related systems, including emergency core cooling systems, and for the control of equipment.

Station procedure 308, revision 45, "Emergency Core Cooling System Operation," section 4.3 (Placing the Emergency Core Cooling System in Standby Readiness) requires the completion of valve and electrical checkoff lists 308.1 and 308.2 to place the emergency core cooling system in standby readiness.

Station procedure 108, revision 53, "Equipment Control," paragraph 4.10.8 requires that during the conduct of equipment positioning and verifications, each component shall be checked to ensure that a correct component label is present, and that labeling deficiencies shall be reported to the GSS for disposition.

Contrary to the above, on May 2, 1991, written procedures were not adequately established and implemented as evidenced by the following examples:

1. Procedures were not adequately established in that electrical checkoff list 308-2 was not complete as required when it was discovered on March 5, 1992, that two breakers required to be verified by the checkoff list were not included on the list. Breaker #15 on 125 VDC Panel F, panel 18R/19R alternate power source for reactor water level low-low signal, was not included on checkoff list 308-2 as required to verify core spray standby readiness. The power supply for Panel 2F Solenoid Valves, breaker #19 on panel VACP-1, had not been verified by any previously completed electrical checkoff list.
2. Procedures were not adequately implemented in that operators did not identify and report the breaker labeling and checkoff list 308-2 description differences to the GSS for disposition as required by station procedure 108, step 4.10.8, during the equipment verification conducted on May 2, 1991.

This is a severity level IV violation (Supplement I).

Response:

GPUN concurs with the violation as stated.

The reason for the violation is clarified as follows:

The Electrical Checkoff List for Procedure 308, Emergency Core Cooling system, did not correctly identify two breakers required to be energized, prior to placing the system in standby readiness. One Breaker (#15) was correctly described but incorrectly numbered. The description of the other breaker (#19), contained outdated information and referenced the wrong panel and breaker number. Although breaker schedules posted inside electrical panels are not controlled procedurally, neither description matched the respective breaker schedule description and, when the Checkoff was completed, these discrepancies were not noted.

Corrective Actions Taken and Results Achieved:

Temporary change T/C 3/6/92-9 was issued on March 6 1992 with the corrected number and description of the breakers. The temporary change has since been included in revision 46 to Procedure 308. Additionally, the Electrical Checkoff Lists for other safety related systems were walked down, resulting in the issuance of three additional temporary procedure changes. Deviation reports were written for all discrepancies found.

Corrective Action To Be Taken:

The corrective actions specified above should prevent the recurrence of such procedural discrepancies. The modification process, as described in Procedure 124, "Plant Modification Control" will capture any future changes to electrical panels and ensure all procedure revisions are complete. In addition, an effort is underway to review and upgrade all breaker schedules to Operator Aid status. An Operator Aid can consist of a graph, chart, instruction, drawing or other document that may be used by personnel to assist them in operating the plant. These Operator Aids are procedurally controlled.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on March 6, 1992 when Temporary Procedure Change T/C 3/6/92-9 was issued.