



State of New Jersey
Department of Environmental Protection and Energy
CN 415
Trenton, NJ 08625-0402

Scott A. Weiner
Commissioner

July 21, 1992

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Summary of Changes to Systems and Procedures for
1991

The New Jersey Department of Environmental Protection and Energy's Bureau of Nuclear Engineering (BNE) has reviewed GPU Nuclear Corporation letter C321-92-2164, dated June 22, 1992. This letter provided a description and safety evaluation summary for certain changes to procedures and modifications to the plant during 1991 as required by 10 CFR 50.59. We have an overall concern and a specific comment as delineated below.

Safety evaluations, required by 10 CFR 50.59, are the bases for licensees to modify plant hardware and procedures without obtaining prior NRC approval. For this reason, the BNE believes each safety evaluation must include a rationale and basis for concluding that a change to plant hardware and procedures is not an unreviewed safety question. Some of the safety evaluation summaries in the GPUN letter include this; however, many do not. These instead recite the words from 10 CFR 50.59 and state only that an unreviewed safety question isn't created by the change. It is our recommendation that the NRC ensure through the appropriate means (e.g. information request or inspection) that a sound basis exists for the procedure and plant changes made at Oyster Creek. Attachment 1 is a list of the modifications for which the safety evaluation summary was lacking.

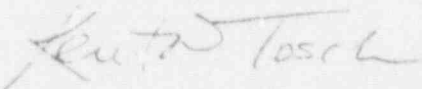
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In addition, the BNE has a concern with the safety evaluation performed for the procedure change related to augmented offgas system operation. This procedure change reduces the holdup times for xenon and krypton. The safety evaluation summary states that "since there has been no increase seen in activity in the stack gas monitors and no increase seen in AOG radiation monitors, this safety evaluation is good for 60 days." It appears that the safety evaluation was written after the procedure change was implemented. It is our recommendation that this procedure change be re-evaluated and that the safety evaluation process for procedure changes be assessed for adequacy.

If you have any questions, please contact Rich Pinney at (609) 987-2086.

Sincerely,



Kent W. Tosch, Manager
Bureau of Nuclear Engineering

Attachment

c: Jill Lipoti
Assistant Director, Radiation Protection Programs
N.J. DEPE

D. Vito
Senior Resident Inspector

A. Dromerick
Project Manager
U.S. NRC

J.J. Barton
Vice President and Director
Oyster Creek

SAFETY EVALUATION SUMMARIES LACKING BASIS

Procedure Changes:

Augmented Offgas System Operation

Alternate Water Supply to AOG Heat Exchanger

Modifications:

RPV Heat Vent Valve Addition (SE 402953-010)

Appendix J Replacement Options (SE 402946-001)

Total Feedwater Flow Element Addition (SE 402945-001)

Temporary Demineralizer System (SE 312100-003)

125V DC System Knife Switch Modification (SE 323560-008)

RWCU Drywell Penetration Pipe Replacement (SE 402938-001)

Note: This safety evaluation references a Section 3 that is not provided in the GPUN letter.

Drywell Chiller Unit Piping Modification (SE 402939-001)

Torus Oxygen Sample Line Isolation Valves Modification (SE 402872-001)

Core Spray/ADS Logic Modification (SE 328279-001)

Reactor Manual Control System Modification (SE 328298-001)

Containment Airborne Particulate and Gaseous Radiation Monitor System - Phase II (SE 402815-002)

ESW Flow Indication (SE 402859-001)

Heater Bay Roof Trailers, Fire Protection (SE 402860-003)

Circulating Water Pump Pit Conduit Replacement (SE 402869-001)

Sewer Water Radiation Monitor Upgrade (SE 328293-004)

Main Feedwater Line Block Valve Addition (SE 402901-002)

Temporary Torus Fans and Filter (SE 000820-002)

Monitor Sump for Conduit Pit in Feedwater Pump Room (SE 408843-001)

SAFETY EVALUATION SUMMARIES LACKING BASIS

Remove Core Spray Min. Flow Check Valves (SE 000212-018)

Reactor Building Construction Power Upgrade (SE 402949-001)

Drywell Power Improvement (SE 402939-004)

Chlorination System Upgrade (SE 402792-001)

Installation of Test Modules in the SDIV Level Circuit (SE 402953-002)

Chemical Decontamination Support Modifications (SE 328265-004)