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March 21, 1985

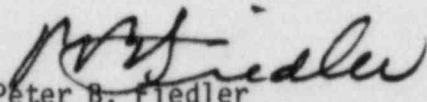
Mr. Harry B. Kister, Chief
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection 84-34

Attachment I to this letter provides our response to the Notice of Violation contained in Appendix A of your letter dated February 20, 1985.

In the event that any comments or questions arise, please contact Mr. Drew Holland of my staff at (609)971-4643.

Very truly yours,


Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/DGH/dam(0928A)
Attachment

cc: Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731

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ATTACHMENT I

VIOLATION:

As a result of the inspection conducted on Nov. 18 - Dec. 31, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583), the following violation was identified.

Paragraph 6.8.1 of the Oyster Creek Technical Specifications requires that written procedures shall be established, implemented and maintained.

Paragraph 3.12 of Oyster Creek Radiological Control Procedure 902.5 states that prior to making a containment entry, sufficient control rods shall be inserted so that the GSS can verify the reactor is subcritical and power level is decreasing.

Contrary to the above, on November 23, 1984, a containment entry was made without first inserting control rods to make the reactor subcritical and verify decreasing power level.

This is a Severity Level IV Violation.

RESPONSE:

GPUN concurs that a containment entry was made as described without first inserting control rods to make the reactor subcritical and verify decreasing power level.

Immediate corrective actions included prohibiting all drywell entries at partial power until a new Operations procedure (Procedure 233) was developed and issued. The procedure was written using input from senior staff members from various disciplines and from recommendations included in two independent reports. All input was reviewed and the results incorporated into the drywell entry procedure. Specifically, the new procedure includes the following key elements:

1. Specific responsibilities (personnel) are defined.
2. Written verification of safety requirements.
3. Upper level Ops/Rad Con management approval.
4. Lead person responsible for the entry identified.
5. Requirement for the GSS to assure all prerequisites are met.

The incident was reviewed by Radiological Controls and Operations Departments and detailed results of their investigations were written up by Radiological Controls. In addition, the incident was reviewed by both departments for any "lessons learned". Concurrently, a consultant performed an independent assessment of the incident, and subsequently made recommendations to the Vice President and Director, Oyster Creek.

No further corrective actions are anticipated at this time. It was determined that the procedure violation was not willful. Full compliance was achieved on December 29, 1984 with the issuance of Procedure 233, "Drywell Access and Control". It should be noted that experience with the new procedure has indicated that it does in fact provide the degree of control necessary and has prevented any recurrence of a similar incident.