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Writer's Direct Dial Number:

December 11, 1984

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Response to IE Inspection No. 50-219/84-21

This letter is in response to your letter of November 6, 1984 which forwarded the above referenced inspection conducted by Mr. A. Krasopoulos of your staff on July 23-27, 1984. This inspection documented a Notice of Deviation and requested additional information.

As a result of the inspection conducted on July 23-27, 1984, the following deviation from an Oyster Creek commitment to the NRC was identified:

Fire Protection Report - Comparison to Standard Review Plan 9.5.1, Appendix A, states that because the stairwells serve as escape routes and access routes for fire fighting, the stairwells have been designed to minimize smoke infiltration by their enclosures.

Contrary to the above, the enclosure of the Reactor Building Southwest Stairwell contained a hitherto unsealed penetration that would allow smoke infiltration in the stairwell in the event of fire.

On July 25, 1984, GPUN issued work request No. 19976 to seal the duct penetration noted in the deviation. This penetration was sealed on July 29, 1984 to prevent smoke infiltration into the Reactor Building stairwell. Oyster Creek Procedure 645.6.017, "Fire Barrier Penetration Surveillance" will be revised to incorporate a review of all stairwells which serve as escape and access routes for fire fighting at least once every 18 months. This procedure revision should be completed within the first quarter of 1985.

Mr. Krasopoulos requested additional information in order to close Unresolved Item (50-219/80-07-02). This unresolved item was initiated as a

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result of an inspection conducted on February 12-15, 19-20, and 26-29, 1980 by Mr. P. Koltay of your staff. By JCP&L letter (attachment 1) dated March 3, 1980, Mr. J. F. Mancinelli sent to Mr. Koltay the information requested. Based on a follow-up phone conversation with Mr. Koltay on March 12, 1980 and no additional correspondence since, it was our impression that this item was closed. It is requested that Mr. Krasopoulos review the information submitted by our March 3, 1980 letter, then advise accordingly.

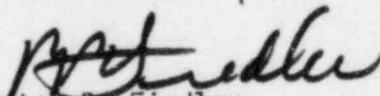
Mr. Krasopoulos also requested additional information in order to close Unresolved Item (50-219/82-07-01). As discussed with Mr. Krasopoulos via telephone on December 6, 1984 additional time is needed to gather this information. We plan to submit this information to you by December 31, 1984.

In paragraph 3.5.1 of the inspection report, Mr. Krasopoulos issued Unresolved Item (50-219/84-21-01), noting that the licensee did not have a program to inspect, test or maintain the Heating, Ventilating and Air Conditioning (HVAC) duct work fire dampers. In addition, Mr. Krasopoulos stated that "The licensee committed to develop a program, prior to startup, for surveillance testing and inspection of the fire dampers." While GPUN did commit to developing this program, we believe that we did not commit to having this program in place prior to startup.

On November 8, 1984, Oyster Creek Procedure 645.6.026, "Fire Damper Functional Test" was issued for review. The procedure scope includes functional testing and preventative maintenance of fire dampers protecting safety related fire areas. This procedure will be implemented in the first quarter of 1985 following final procedure approval.

Should you require any additional information, please contact Mr. Steve DeMerchant, BWR Licensing Engineer at (201)299-2254.

Very truly yours,

  
Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF/SDM/dam  
Attachments

cc: Dr. Thomas E. Murley, Administrator  
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U.S. Nuclear Regulatory Commission  
631 Park Avenue  
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NRC Resident Inspector  
Oyster Creek Nuclear Generating Station  
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