

## NUCLEAR REGULATORY COMMISSION

Podet File

WASHINGTON, D.C. 20556

July 8, 1992

Docket No. 50-219

Mr. John J. Barton
Vice President and Director
GPU Nuclear Corporation
Oyster Creek Nuclear Generating Station
Post Office Box 388
Forked River, New Jersey 08731

SUBJECT: GPU NUCLEAR CORPORATION PROPOSAL TO REVISE NUREG-0619 REGARDING THE FEEDWATER NOZZLES AND CONTROL ROD DRIVE RETURN LINE NOZZLE (TAC NO. M83157)

The NRC staff has completed its review of the GPU Nuclear Corporation (GPUN) letter dated April 8, 1992, in which GPUN stated their intention to revise commitments and actions regarding the implementation of NUREG-0619 at Oyster Creek Nuclear Generating Station (OCNGS). The subject letter states the following:

GPU Nuclear plans to revise the inspection intervals for these nozzles, as follows:

- Perform ultrasonic testing (UT) inspections of the Feedwater (FW) and Control Rod Drive Return Line (CRDRL) nozzles once each inservice inspection interval in accordance with the ASME Boiler and Pressure Vessel Code Section XI.
- 2. Eliminate future NUREG-0619 routine pressure and temperature (PT) examinations. Internal PT examinations would only be performed if flaws, which would compromise nozzle integrity, are detected.
- Reschedule the FW nozzle UT inspection from the 14R refueling outage (scheduled for January 1993) to the 15R refueling outage (scheduled for October 1994).

The NRC staff reached the conclusion that GPUN's proposal, as stated above, is not acceptable as explained in detail in the attached safety evaluation (SE). The examinations proposed by GPUN above are already required by 10 CFR 50.55a(g)(4) and the Technical Specifications. GPUN's plan to revert back to existing regulatory requirements, in effect, eliminates the augmented inservice inspections addressed by NUREG-0619.

During its evaluation, the staff reviewed the correspondence between the NRC and GPUN since 1980 pertaining to this issum GPUN's plan appears to be in conflict with notarized commitments by GPU is ansmitted in letters dated April 9, 1981 and August 23, 1981. We recommend that GPUN review its correspondence before implementing its current plan.

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The NRC staff prepared an SE in November 1990 regarding the phased array UT system that involved the deferral of the PT in the 13R outage. This SE was contagent upon a demonstration that the phased array UT system has the capability to detect thermal fatigue cracks that are 0.172 inch in depth. In april 8, 1992 letter, GPUN indicates that the capability to detect and thermal fatigue cracks in both FW and CRDRL nozzle mock-ups should be available in the latter part of 1992. Therefore, the effectiveress of the UT performed during the 13R outage is still an open issue.

estimated that an internal PT examination, pursuant to NUREG-0616 would in a 350-400 man-rem exposure. The staff understor the potential exposure involved in this task from the numerou repairs. However, itted a letter dated November 20, 1985 that the liquid penetrant ce criteria used during the 1977 repair could have inadvertently lettered flaw 0.062" deep. GPUN's fracture mechanics evaluation led that an assumed 0.062" initial flaw left in the feedwar mozzle grow to a total depth of 0.107" by the 12R refueling outage. Since this lid be below the anticipated level of detectability (0.172 inch) of the phase array system, the staff expected GPUN to schedule automated ultrasonic examination of all five nozzles at a conservative inspection interval.

He request that within 60 days of receipt of this letter, GPUN provide a schedule of when the capability of the phased-array UT technique used in 13R will be available for our review and address the issues identified in the SE.

The requirements of this letter affect fewer than 10 respondents, and therefore, are not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

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Alexander W. Dromerick, Senior Project Manager Project Directorate I-4 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: As stated

cc w/enclusure: See next page

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