JUL 16 1992

Docket No. 50-219

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

Dear Mr. Barton:

SUBJECT: INSPECTION REPORT NO. 50-219/92-08

This refers to your letter dated July 2, 1992, in response to our letter dated June 2, 1992.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperations with us is appreciated.

Sincerely,
Original Signed By:
John F. Rogge

A. Randolph Blough, Chief
Projects Branch No. 4
Division of Reactor Projects

cc w/o licensee ltr:
M. Laggart, Manager, Corporate Licensing
G. Busch, Licensing Manager, Oyster Creek

cc w/licensee ltr:
K. Abraham, PAO, (2)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New Jersey

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IE01

bcc w/o licensee ltr:
Region I Docket Room (with concurrences)

bcc w/licensee ltr:
DRS/EB SALP Coordinator
DRSS SALP Coordinator
J. Joyner, DRSS
R. Blough, DRP
J. Rogge, DRP
R. Lobel, OEDO
A. Dromerick, NRR/PD 1-4
F. Young, SRI, TMI
L. Rossbach, SRI, Beaver Valley
A. Finkel (see Section 1.3)

RI:DRP	RI:DRP	RI:DRP
D. Vito	J. Rogge	R. Blough
7/6/92	7/6/92	7/6/92

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GPU Nuclear

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

July 2, 1992
C321-92-2203

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Response to Notice of Violation
Inspection Report 92-08

This letter is being written to respond to the Notice of Violation contained in Enclosure 1 of NRC Inspection Report 50-219/92-08. The GPU Nuclear response is submitted as Attachment I to this letter.

If any further information is necessary, please contact Mr. John Rogers of my staff at 609.971.4893.

Very truly yours,

John J. Barton
Vice President and Director
Oyster Creek

JJB/JJR
Attachment

cc: Administrator, Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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The operator involved in the procedure violation was disqualified. Operations Department Management discussed the need to perform self-checking with the operator, and emphasized the Operations Department Standard on Procedure Compliance. A training and requalification program was developed for the operator who had performed the surveillance, to be completed prior to resuming licensed duties.

The Station Director met with all operating shift crews to discuss management's expectations regarding human performance issues and the requirement for all operators to use self-checking techniques.

Additionally, temporary changes were issued for the surveillance procedures which separated and clarified the required actions into distinct steps (one for each system).

Corrective Actions to Prevent Violations:

Procedure surveillance procedures required by the

Training developed and

Date

ATTACHMENT I

VIOLATION:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained that meet or exceed the requirements of Regulatory Guide (Reg Guide) 1.33, Revision 2, "Quality Assurance Program Requirements (Operation)". Reg Guide 1.33, Appendix A requires that procedures be written for surveillance testing of the Containment Spray system.

Station procedure 604.4.007, Revision 13, "Containment Spray and Emergency Service Water System 1 Pump Operability and Inservice Test", step 6.20, requires the Containment Spray and Emergency Service Water (ESW) pumps to be secured if inservice testing (IST) is not required to be performed.

Contrary to the above, on April 20, 1992, the Control Room Operator failed to implement procedure 604.4.007 in that the Containment Spray and ESW pumps were not secured when performance of IST was not required before proceeding to the next step in the procedure. As a result of this action, the system was aligned to spray the containment when the operator placed the system control switch in the AUTO I position, and approximately 825 gallons of water were sprayed into the containment.

GPUN RESPONSE:

GPU Nuclear concurs in the violation.

The incident has been attributed to operator error, in that the Control Room Operator performing the surveillance procedure failed to apply self-checking in its execution. The operator overlooked a step in the procedure requiring him to stop the Containment Spray Pump, and proceeded to reposition the mode switch with the pump still running. This allowed approximately 825 gallons of torus water to be sprayed into the Drywell.

Corrective Actions Taken and Results Achieved:

The pump was tripped approximately 29 seconds after the error, and flow to the Drywell was terminated. The operators took the actions required by the Alarm Response Procedures for the alarms received.

The expectations of Operations Department Management regarding compliance with the Operations Department Standard on Procedure Compliance were communicated to all department personnel.

The operator involved in the procedure violation was disqualified. Operations Department Management discussed the need to perform self-checking with the operator, and emphasized the Operations Department Standard on Procedure Compliance. A training and requalification program was developed for the operator who had performed the surveillance, to be completed prior to resuming licensed duties.

The Station Director met with all operating shift crews to discuss management's expectations regarding human performance issues and the requirement for all operators to use self-checking techniques.

Additionally, temporary procedure changes were issued for the surveillance procedures which separated and clarified the required actions involved into distinct steps (one for each system).

Corrective Action to be Taken to Avoid Further Violations:

Procedure changes will be developed for the two surveillance procedures, which will upgrade them to the format required by the Procedure Writer's Standard.

The concept of Crew Self-Checking will be developed and training implemented for all operating crews.

Date When Full Compliance was Achieved:

Full compliance was achieved on April 20, 1992, when the running Containment Spray Pump was tripped, approximately 29 seconds after the error was made.