

SEP 10 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. 50-219/92-80

This refers to your letter dated August 13, 1992, in response to our letter dated July 9, 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 cooperation with us is appreciated.

Sincerely,

Jacque P. Durr, Chief  
Engineering Branch  
Division of Reactor Safety

cc w/encl:

M. Laggart, Manager, Corporate Licensing  
P. Czaya, Acting Licensing Manager, Oyster Creek  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
K. Abraham, PAO (2) All Inspection Reports  
NRC Resident Inspector  
State of New Jersey

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PDR ADDCK 05000219  
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John J. Barton

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bcc w/encl:

Region I Docket Room (with concurrences)

DRS/EB SALP Coordinator

J. Joyner, DRSS

R. Blough, DRP

J. Rogge, DRP

R. Lobel, OEDO

A. Dromerick, NRR/PD 1-4

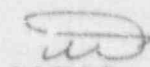
F. Young, SRI, Three Mile Island

L. Rossbach, SRI, Beaver Valley

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RI:DRS

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**GPU Nuclear Corporation**  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey 08731-0388  
609 971-4000  
Writer's Direct Dial Number:

C321-92-2235  
August 13, 1992

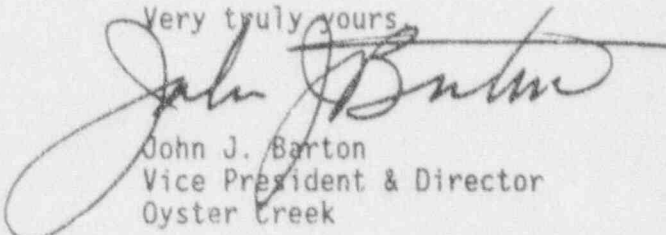
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Dear Sir:

In accordance with 10 CFR 2.201, the enclosed provides GPU Nuclear's response to the Notice of Violation identified in NRC's Inspection Report 50-219/92-80.

If you should have any questions or require further information, please contact Thomas Blount, OC Licensing Engineer at (609) 971-4007 or Mr. Dave Jerko at (201)316-7976.

Very truly yours,



John J. Barton  
Vice President & Director  
Oyster Creek

cc /TB:jc  
Administrator, Region 1  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager

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RESPONSE TO NOTICE OF VIOLATION

Inspection Report 50.219/92-80

Violation:

10CFR50 Appendix B, Criterion XI, requires in part that a test program shall be established to assure that all testing required to demonstrate that components will perform satisfactorily in service is identified and performed in accordance with written procedures.

Contrary to the above, on June 5, 1992 no test programs were established for functional tests of battery main breakers, static battery chargers, rotary battery chargers and inverters to assure that they will perform satisfactorily in service. Also, no written test procedures were developed to test these safety-related components.

This is a Severity Level IV Violation (Supplement I).

RESPONSE:

GPUN concurs with the violation.

No test program was established to test the main battery breakers. GPUN will develop Preventive Maintenance (PM) tasks to test all main battery breakers.

The A/B rotary battery chargers are continuously in service and maintain a float charge on the batteries. They are inspected monthly via the Preventive Maintenance Program. When brush replacement or other maintenance is required the static charger is placed in operation and maintains the float charge on the batteries.

The "C" battery float charge is maintained by the in service static charger and backed up by the standby static charger. The back up and standby chargers are alternated each refueling outage.

The rotary inverter supplying continuous instrument panel #3 (CIP-3) consists of independent motors AC or DC driving a common generator. Current PMs perform trip tests of the AC breaker and inspect the motors and generator for signs of sparking, overheating and excessive vibration. In addition, if the rotary inverter generator were to fail, the supply to CIP-3 would transfer to a redundant vital bus (IAI) via an auto transfer switch.

In service battery chargers and inverters are routinely monitored to detect degraded or impending failures.

GPUN recognizes that the above information does not constitute a test procedure or test program. It does, however, indicate the components have been monitored and maintained.

Based on this assessment, the safety significance of not having written test procedures or a test program for these components is considered minimal.

#### The Reason for the Violation

The reason for this violation is the lack of a formal review of the plant equipment to define all the preventive maintenance and operability testing required. This has been recognized by GPUN and discussed with the NRC. Significant efforts are underway to perform such a review and implement any required actions. The following equipment is specifically identified in this violation:

- Battery Main Breakers
- Static Battery Chargers
- Rotary Battery Chargers
- Inverters

#### The Corrective Steps That Have Been Taken and the Results Achieved

PM requests have been issued to implement vendor and engineering recommendations to test the Battery Main Breakers. The current PM for the Rotary Inverter AC circuit breaker has been revised to transfer to the DC motor. This revision will functionally test the standby DC motor. In addition, engineering tasks have been assigned to develop detailed test procedures for the Inverters, Static Battery Chargers and Rotary Battery Chargers.

#### The Corrective Steps Which Will Be Taken to Avoid Future Violations

A Component Maintenance Team will perform a detailed review to determine the maintenance requirements of the equipment identified above. Preventive maintenance will be developed, to ensure this equipment is properly maintained.

The Component Maintenance Team concept was initiated in August 1991. The component maintenance team will specify PM requirements for other critical components in addition to the components identified in this violation.

#### The Date When Full Compliance Will Be Achieved

Preventive maintenance including testing of the Main Battery Breakers (3) and a surveillance test procedure for the inverters will be developed and implemented during the up coming 14R refueling outage.

Preventive maintenance and operability testing will be performed on the rotary and static chargers during the 14R refueling outage. Based on the results of this maintenance and testing, formal PM's and test procedures will be developed and ready for implementation prior to the 15R refueling outage.

Based on the above full compliance will be achieved at the completion of 15R refueling outage.