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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Operating License No. DPR-16
Docket No. 50-219
Generic Letter 89-10, Motor Operated Valve
Response to Request for Additional Information

This letter is in response to NRC request for additional information, dated July 20, 1992, regarding the 35 second delay in closure of the isolation condenser system (ICS) isolation valves. The 35 second time delay is assumed in the valve differential pressure calculation for Valves V-14-34, 35, 36 and 37, ICS condensate return line isolation valves. The worst case postulated differential pressure scenario (GL 89-10 design basis) for these motor operated valves assumes the high energy line break (HELB) occurs at the approximate time of ICS initiation which conservatively produces the highest initial reactor coolant pressure for the transient. The ICS provides decay heat removal for reactor isolation events where the normal heat sink (main condenser) is unavailable, and is initiated by reactor vessel high pressure or low-low water level. It also provides alternate shutdown capability in the event of damage from a fire or natural phenomenon. The ICS high flow trip setpoints provide automatic isolation if a pipe rupture is detected. The setpoint of three hundred percent of normal flow lasting over 35 seconds affords protection against pipe rupture without causing spurious system isolation due to operating transients. The 35 second isolation signal time delay is part of the licensing and design basis for OCNGS to provide assurance that the ICS system is not inadvertently isolated.

The ICS High Flow Alarm panel indication is annunciated only if the high steam flow or high condensate flow signal has been sustained for 35 seconds. If the high flow signal has been sustained for 35 seconds, the panel alarm window annunciates Condenser A or B High Flow - Possible Rupture. The OCNGS Alarm Response Procedure (2000-RAP-3024.01) for the ICS A & B High Flow-Possible Rupture Alarm identifies confirmatory operator actions to verify condenser area high temperature alarms and to verify closure of the respective isolation valves. If a pipe break is verified, the procedure directs the operator to place the control switches for the isolation valves in the "Close" position.

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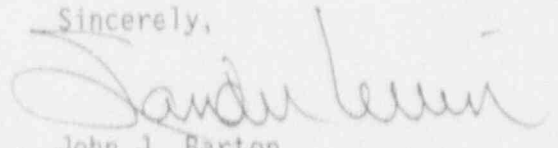
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The Condenser A or B Vent Hi Alarm is also annunciated upon an upscale trip of the ICS A or B Vent radiation monitor. The alarm response procedure similarly directs the operator to verify the high radiation level on redundant indicators, and provides a note that the alarm is not positive indication of a leak in the ICS. The operator is further directed to check isolation condenser temperature and level for indications of a leak.

Operator training at OCNCS presently emphasizes the importance of the Isolation Condenser System as a decay heat removal system and that the operator is to confirm that a pipe rupture has indeed occurred before the system should be isolated. Therefore, the focus of the operator is not directed to immediate isolation of the ICS. Present training and procedural guidance emphasizes that the pipe rupture is to be confirmed before isolation of the ICS. No guidance or direction is given to override the 35 second delay to manually isolate on an immediate basis. Therefore, we believe that the assumption of a 35 second delay in closure of the motor operated ICS condensate line isolation valves, for determination of the valve design basis differential pressure, accounts for the actual system and operator response to such a postulated scenario.

Based on the above, GPUN believes that adequate procedures and training guidance are presently provided such that it is unreasonable to postulate that the operator would take action within 35 seconds to isolate the ICS.

Sincerely,


for John J. Barton
Vice President and Director
Oyster Creek Nuclear Generating
Station

JJB/DD:lga

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