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Writer's Direct Dial Number:

January 29, 1985

Mr. Harry B. Kister, Chief
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Kister:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection 84-20

The attachment to this letter provides our response to the Notice of Violation contained in Appendix A of your letter dated December 28, 1984.

If there are any questions, please contact Mr. Drew Holland at (609) 971-4643.

Very truly yours,

Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/KB/dam
Attachment

cc: Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731

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Attachment

Violation

Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained.

Contrary to the above, the following are examples in which the Conduct of Maintenance procedure was not properly implemented.

1. Station Procedure 105, Conduct of Maintenance, Appendix A, Section 13 requires the Group Maintenance Supervisor or the Job Supervisor complete the Malfunction/Cause section of the Maintenance and Construction Short Form identifying the specific malfunction and cause of the failure or problem.

During a review of completed Maintenance and Construction Short Forms conducted on July 30, 1984, many forms were noted on which the Malfunction/Cause section was not completed. Work Request Nos. 16287, 16266, 14372, 14617, and 10027, dealing with important to safety systems, are examples where the Malfunction/Cause section was not completed.

2. Station Procedure 105, Conduct of Maintenance, Appendix A, Section 2.0 requires the Department Manager/Supervisor to indicate on the Maintenance and Construction Short Form if the problem or work request involves work which is Important-to-Safety as defined in the GPUN Operation Quality Assurance Plan and Appendix B of the Conduct of Maintenance Procedure.

During a review of completed Maintenance and Construction Short Forms conducted on July 30, 1984, some forms were noted where tasks obviously Important-to-Safety were incorrectly classified. Work Request Nos. 19505, 18456, 16194, and 15999 dealing with important to safety systems are examples of tasks which were incorrectly classified.

This is a Severity Level V Violation.

Response

1. GPUN concurs that in the past some Maintenance and Construction (M&C) Short Forms were deficient, in that the Malfunction/Cause section of the Short Forms had not been completed.

It is the responsibility of the M&C Production Section Supervisor to complete, along with other sections, the Malfunction/Cause section of the Short Form backsheet. Administrative procedures are in place specifying this requirement and, after review, are deemed sufficient.

Corrective steps taken to correct the immediate problem:

To prevent a recurrence of this deficiency, the M&C Department implemented actions involving Managers and Supervisors to assure compliance in this area. Specifically, the M&C Director met with Foremen, Supervisors, Production Managers, Planners and others to stress the procedural requirement in this area and to remind the attendees of their responsibilities and accountabilities in regards to this issue.

Corrective steps taken to prevent recurrence:

GPUN expects that increased management attention focused on this deficiency will bring it under control.

Full compliance date - At the time of identification of this deficiency, immediate steps were taken to bring about full compliance.

2. GPUN concurs that there have been Short Forms where tasks were incorrectly classified.

Corrective steps taken to correct the immediate problem:

It is the responsibility of the Short Form originators to properly identify whether work to be performed is "Important to Safety" or "Not Important to Safety". The Plant Materiel Department then reviews that judgment before forwarding the Short Form to M&C. Plant Materiel will give increased attention to this area of the Short Form and to proper classification of the work to be performed.

M&C will ensure that such judgement is made on the Short Forms as they are received and if the classification appears to be incorrect, they will resolve the issue with the Plant Materiel Department.

Corrective steps taken to prevent recurrence:

Plant Materiel and M&C Department personnel involved in the review of Short Forms have been instructed that increased attention is required in this area to ensure proper classification of work to be performed through Short Forms. GPUN expects that this added attention in this area will prevent recurrence.

Full compliance date - At the time of identification of this deficiency, immediate steps were taken to bring about full compliance.