

SEP 12 1974

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OYSTER CREEK VACUUM BREAKERS AND ENFORCEMENT

A DL meeting held with JCP&L on 9/6/74 will result in new Technical Specifications for the O.C. vacuum breakers and installed alarm system. This T.S. will provide for continuation of operations, with up to four of the fourteen suppression chamber to dry well vacuum breakers inoperable. This requirement is similar to requirements specified in a Skovholt letter to JCP&L dated January 30, 1974.

Skovholt's letter in Section B.5 stated that reactor operation could continue provided not more than 25% of the breakers were inoperable. A review of AO's indicates that JCP&L has followed the requirements of the January 30, 1974 letter, which is less restrictive regarding the referenced operability requirement, than the T.S. It is noted that the DL letter is not a "temporary" T.S. nor a T.S. change. Additionally, by letter to DL dated February 14, 1974, JCP&L stated that concerning vacuum breaker valves, surveillance would be conducted and limitations imposed as specified in the DL letter, with the exception of requirement B.5 as referenced above. JCP&L on three occasions has not complied with their stated intent.

The following AO's relate:

- (1) 50-219/74-11 on 2-15-74 - four inoperable breakers.
- (2) 50-219/74-14 on 2-22-74 - two inoperable breakers.
- (3) 50-219/74-15 on 2-28-74 - one inoperable breaker.
- (4) 50-219/74-16 on 3-7-74 - four inoperable breakers.
- (5) 50-219/74-46 on 8-26-74 - one inoperable breaker.

We have inspected the first four AO's (RO Inspection 50/219-74-5) on March 27-28, 1974 and also issued a citation regarding AO No. 11 and 16. For the former, reactor operation continued when one of the four breakers was made immediately operable, thus providing less than 25% inoperable and for the latter, reactor shutdown commenced. The citation referenced Skovholt's letter as a basis.

CRESS *ejs*
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B/466

My view is as follows:

- 1) AO 74-11, 14, and 16 are violations of the existing T.S.
- 2) AO 74-11 and 16 have already been covered via inspection and enforcement letter.

We could retrofit these two violations, (already issued) however, I fail to see any necessity.

- 3) A citation could be issued concerning AO 74-14; however, this would negate the effectiveness of Skovholt's letter.

JCP&L as of today, has an inoperable breaker which is permissible under the T.S.

I recommend that we closely follow DL action regarding issuance of the T.S. If the T.S. is not issued by 8/25/74 and prior to conduct of the next surveillance, I think JCP&L should be held to their February 14th letter. RO should not be in a position where the licensee can select from conflicting requirements and flip flop to suit his purposes, even though we recognize the technical validity of the 25% operability number. The licensee has been apprised that I consider the February 14, 1974 letter to DL, which references their commitment, to be in effect. The above has also been discussed with DL.

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cc: Capton
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