10 CFR 2.790 INFORMATION

License No. DPR-16
Docket No. 50-219

APPENDIX B

NOTICE OF DEVIATION

1. Contrary to the Oyster Creek Industrial Security Plan, dated January 7, 1974, Section 3.4.2, Control, licensee personnel stated at the time of the inspection that BC-1 keys which open the locks of all fence gates, exterior building doors and designated vital area doors have been issued to all employees. Also, no accurate records have been maintained of the number of keys issued, before September, 1974.

2. Contrary to the Oyster Creek Industrial Security Plan, dated January 7, 1974, Section 3.4.3, Surveillance, no record has been maintained by control room personnel of building doors reported to them as being unlocked by security force members at the station or any action taken by the former personnel in response to such reports.

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APR 17 1975

Memo to File
Thru: D. L. Caphton, Senior Reactor Inspector
OIE:I, Reactor Operations Branch

OYSTER CREEK PARTIAL 8 x 8 FUEL LOADING - 1975 OUTAGE

The Oyster Creek 1975 reload will consist of (40) 7 x 7 and (72) 8 x 8 fuel bundles. The outage is currently in progress with startup projected on or about May 10, 1975. The licensee has submitted by applications dated May 31, 1974, January 30, 1975 and January 31, 1975, proposed amendments to permit operation of the facility using a partial loading of 8 x 8 Exxon fuel.

During the course of the Millstone Point 1 1974 refueling outage, a similar issue developed with respect to loading of a single 8 x 8 lead assembly. This issue was resolved by RL issuance of a Technical Specification change, which did not preclude loading of the referenced bundle. In the case of Oyster Creek, however, the existing Technical Specifications do not specifically address a 7 x 7 array. The FSAR addresses the subject, but is silent concerning enrichment changes. Given this scenario, I conclude that JCP&L can load 8 x 8 assemblies into the reactor core under 10 CFR 50.59. Not withstanding, I am not comfortable with this load as such, lacking formalized authorization. This subject was discussed with the licensee in 1974, with RL in 1974 and early 1975, and was additionally referenced in daily reports as a potential problem area.

On April 14, 1975, I again discussed this issue with Walt Paulson, the RL Project Manager. Paulson informed me that according to his file memorandum, dated February 10, 1975, he had informed JCP&L of the NRC position that Oyster Creek could load fuel and not startup without authorization from RL. The memorandum which Paulson referenced was not specific as to array makeup. Paulson and I discussed startup definition and both concurred that the reactor is in the startup mode when the reactor mode switch is in startup position and rods are pulled. This definition precludes low power physics testing and shutdown margin tests.

In that RL informed me that the processing of authorization for startup involves the 8 x 8 proposal as well as ECCS criteria, authorization may not be available by May 1 when the licensee is scheduled to begin core verification and shutdown margin testing. Paulson called me on April 17, 1975 after discussing the matter with G. Lear. Any delay in authorization would relate to incomplete analysis for ECCS and RL

(project manager) supports the position with respect to startup. I called the site on April 17, 1975 and suggested that JCP&L contact RL.

E. G. Greenman
Reactor Inspector

cc: J. P. O'Reilly
E. J. Brunner
D. L. Caphton
E. C. McCabe