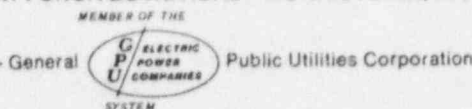


# Jersey Central Power & Light Company



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June 17, 1975

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement, Region 1  
United States Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. O'Reilly:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection No. 75-11

This responds to the concerns of Inspection No. 75-11 which was conducted by Mr. Martin on April 14-18, 1975 at the Oyster Creek Nuclear Generating Station.

The inspection report stated that "portions of the refueling work list involving fuel motion were not signed by the Technical Supervisor and the Supervisor of Operations, but were prepared and approved by one Assistant Staff Engineer" and that this violated the requirements of Procedure 212. Refueling operations at the Oyster Creek Station involving the physical movement of fuel are, in accordance with Plant Procedure 1002.6, listed on forms prepared and signed by engineers in the Technical Department. Since the Technical Group has the responsibility for developing the final core arrangement, they plan all fuel movements in order to arrive at the final configuration in the most efficient manner by minimizing the total number of fuel moves. After this planning, the move sequencing is distributed to the Operations Group, and the planned fuel moves are executed. This practice has been in effect at the Oyster Creek Station for all previous refueling outages. The plant staff has reviewed Plant Operations Procedure 212 and will revise the reference to fuel move documentation to eliminate the conflicting control mechanisms.

The fuel move sheets that are used to designate the order of fuel movement are intended to be prepared and approved by different members of the Plant Technical Group. However, emergency conditions do exist when changes and/or additional moves have to be developed with only one engineer available. In order to allow for this, provisions have been made to have one individual prepare and approve the fuel moves. When this occurs, the fuel move sheet is subsequently reviewed by another member of the Technical Department.

The inspection report contained additional items of concern which are discussed below.

1. Refueling Bridge Monitors

A check of the Instrument Department personnel involved in the calibration of these monitors confirmed that the calibration was performed on schedule. The written record, however, has been either misplaced or lost.

2. Roof Leak

Plans were initiated in the fall of 1974 to have the Reactor Building roof repaired. The current schedule specifies the repairs to begin in the fall of 1975. A secondary containment leak rate test was satisfactorily performed prior to the refueling outage as per the Technical Specification requirements. Results of these tests are routinely reported in the semiannual reports.

3. Refueling Bridge Practices

Procedure 212 will be revised and updated to reflect more stringent requirements regarding operator duties during actual incore fuel movements to alleviate the concerns expressed. In the interim, a memorandum was issued on April 23, 1975 to require additional controls during refueling. This will supplement Procedure 212 until the formal procedure changes can be effected.

4. New Control Rod Drives

Venting, timing and notching of newly installed Control Rod Drives (CRDs) is a requirement of Operating Procedure 302. The procedure was reviewed and deemed to be satisfactory in its specification for check out of all new CRDs. Therefore, no revision of the Master Startup Checkoff is necessary.

5. Completed Logs and Procedure Review

Having recognized that occasionally logs and checkoffs will be missing entries, be illegible, etc., a staff audit has been in effect whereby all completed surveillance sheets are reviewed for content by staff personnel and all log sheets by the Operations Supervisor. Additionally, all operational surveillance sheets have a back sheet attached to them to help in identifying discrepancies. It is felt that this system has provided controls which eliminate most of the common problems associated with a system accustomed to generating the

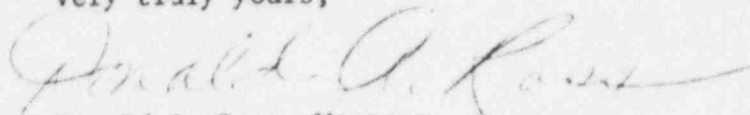
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amount of checkoffs as required by a nuclear generating station. Unfortunately, no system is completely foolproof and at times illegible entries have gone through undetected. We will continue our attempts to minimize this problem.

6. Potential Common Mode Failures

The concern expressed was in the performance of "SRM Semiannual Bench Calibration" by a single individual. These "bench" calibrations are done prior to refueling operations and are performed by a qualified instrument technician using an approved procedure. The SRMs are further checked following reinstallation, then checked daily and tested weekly while being required during refueling operations. We feel this should be satisfactory to preclude a failure of the type expressed going undetected.

Very truly yours,



Donald A. Ross, Manager  
Generating Stations-Nuclear

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