



**GPU Nuclear Corporation**

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January 23, 1986


Thomas T. Martin, Director  
Division of Radiation Safety and Safeguards  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection 85-30

Pursuant to 10CFR2.201, Attachment I to this letter provides our response to the Notice of Violation contained in Appendix A to your letter of December 24, 1985.

If you should have any questions, please contact Mr. John Rogers of my staff at (609)971-4893.

Very truly yours,

  
Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF/JR/dam  
(0142A)  
Attachments

cc: Dr. Thomas E. Murley, Administrator  
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NRC Resident Inspector  
Oyster Creek Nuclear Generating Station

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## ATTACHMENT I

### Violation:

10 CFR 70.51(c) requires, in part, that each licensee establish, maintain, and follow written material control and accounting procedures which are sufficient to enable the licensee to account for the special nuclear material in his possession under license.

Oyster Creek Nuclear Generating Station Procedure 1002.4, Revision 9, "Documentation/Accounting of the Receipt, Shipment, Transfer, and Movement of Special Nuclear Material (SNM)", requires (SNM Card File-Purpose 3.4.1 and Entries in the SNM Card File 3.4.2) that upon receipt of a completed Item Control Area (ICA) transfer and/or completed SNM Move Sheet, the Core Engineering Manager or his designee shall record the transfer as provided on the appropriate Fuel Management Card located in the Kardex file.

Contrary to the above, the inspector determined on October 3, 1985 that the Kardex file had not been maintained to record the movement of certain fuel bundles located in the spent fuel pool which had been relocated on August 25 and 26, 1984 as shown on SNM Move Sheet Nos. 84-123, 84-124, and 84-125.

### Response:

GPUN does not concur in the violation as written.

10 CFR 70.51(c) does require that written material control and accounting procedures, sufficient to enable the licensee to account for the Special Nuclear Material (SNM) in his possession, be established, maintained, and followed. The specific GPUN record which details the transfer of all SNM within an Item Control Area (ICA) is the Documentation Fuel Move Sheet, Figure 1002.4-3, contained in site procedure 1002.4, refer to Attachment II. A properly completed Documentation Fuel Move Sheet represents the Oyster Creek Nuclear Generating Station's legal record of a fuel move or transfer. It provides the authorization for the fuel move, documents the time the movement was completed, and provides licensed operator documentation that the movement was accomplished. The completed Documentation Fuel Move Sheet is filed and stored in the Oyster Creek Document Control Center as a permanent record. These records allow for the accounting and traceability of SNM in our possession as required by 10 CFR 70.51(c). At no time was any Documentation Fuel Move Sheet found to be incomplete or inappropriately filed or stored.

As an internal management control tool, a Kardex card file system was established at Oyster Creek. It serves only as a convenient central file, enabling the quick retrieval of information. It was not intended to provide any legal record as required by any 10 CFR regulation. It should be noted that between February 1983 and September 1985 over 3200 fuel movements were successfully performed. This required the

administration of over 900 Documentation Fuel Move Sheets. This was all accomplished without a single violation of regulatory requirements. It was only during the transposition of information from the legal record to the internal tracking system that the three identified omissions occurred. This represented a total administrative error of less than 0.6%. The administrative controls which exist were and are sufficient to meet SNM accountability requirements. There is no perceived systematic or recurrent problem areas in our accountability process.

The three identified Documentation Fuel Move Sheets were located and the information they contained was entered into the Kardex file system. Site Procedure 1002.4 (Rev. 9) "Documentation/Accounting of the Receipt, Shipment, Transfer, and Movement of Special Nuclear Material" is being revised to clarify any possible ambiguities in regulatory requirements. The revision to this procedure is projected for issuance by the end of March 1986.

SNM Move Sheet		Documentation Fuel Move Sheet				Procedure No. 1002.4, Fig 1002.4-3 Revision No. 8		Page 1 of 1	
Fuel Assembly Serial Number		From Core/Pool Location	To Core/Pool Location	Date	Time	Initials of Supv or Operator	Checker	Remarks	
	<input type="checkbox"/> Core <input type="checkbox"/> Pool	<input type="checkbox"/> Core <input type="checkbox"/> Pool							
	<input type="checkbox"/> Core <input type="checkbox"/> Pool	<input type="checkbox"/> Core <input type="checkbox"/> Pool							
	<input type="checkbox"/> Core <input type="checkbox"/> Pool	<input type="checkbox"/> Core <input type="checkbox"/> Pool							
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	<input type="checkbox"/> Core <input type="checkbox"/> Pool	<input type="checkbox"/> Core <input type="checkbox"/> Pool							
	<input type="checkbox"/> Core <input type="checkbox"/> Pool	<input type="checkbox"/> Core <input type="checkbox"/> Pool							

Prepared by: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_
Approved by: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_