ENCLOSURE 1

NOTICE OF VIOLATION

GPU Nuclear Incorporated Oyster Creek Nuclear Generating Station Docket No. 50-219 License No. DPR-16

During an NRC inspection conducted on April 14, 1997, through May 25, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, June 30, 1995, the violations are listed below:

 Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained that meet or exceed the requirements of NRC Regulatory Guide 1.33.

Contrary to the above, procedure requirements were not established, implemented and maintained, as indicated by the following examples.

 NRC Regulatory Guide 1.33, Appendix A (4.e) recommends procedures for activities, including those for startup, operation, and shutdown of the shutdown cooling system.

Procedure 305, "Shutdown Cooling System Operation," step 4.3.18, requires that <u>WHEN</u> flow in the operating loop has stabilized, <u>THEN</u> valve in pump suction pressure interlock for the operating pump by opening the respective pressure switch isolation valve. Step 5.5.13 of procedure 305 similarly requires that <u>WHEN</u> flow in the loop has stabilized, <u>THEN</u> place the suction pressure interlock for the selected pump in service by opening the respective pressure switch isolation valve.

Contrary to the above, on April 23, 1997, the control room operators placed the "A" and "B" loops of the shutdown cooling system in service without placing the suction pressure interlocks in service for the "A" and "B" pumps by opening the respective pressure switch isolation valves. As a result, the "A" and "B" pumps were operated for about 9 1/2 hours without the necessary low pump suction pressure automatic protection.

 NRC Regulatory Guide 1.33, Appendix A (1.c) recommends procedures for activities, including those for equipment control.

Procedure 108, "Equipment Control," step 9.1.1, requires the control room operator to determine the appropriate isolation boundaries for work activities using Attachment 108-6 (Guidelines for Isolation Boundaries). Item 2.4 of Attachment 108-6 states that the effects on the system if a valve is physically moved during maintenance work shall be considered and additional isolation boundaries shall be added to the outage as appropriate. Step 10.1 of procedure 108 requires the licensed operations supervisor to review the switching order for compatibility with license requirements and station operating conditions.

9707110361 970703 PDR ADOCK 05000219 G PDR Contrary to the above, on March 11, 1997, the control room operator did not determine an appropriate isolation boundary for maintenance to torus spray valve V-21-18 in the containment spray system. The valve was physically moved several times during the maintenance without adequately considering the effects on the system or adding additional isolation boundaries to the outage. As a result, the pressure suppression function of the torus was degraded during the times that maintenance personnel had V-21-18 opened (total of about 10 minutes). Also, the licensed operations supervisor failed to identify that the switching order was not compatible with license requirements and station operating conditions.

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NRC Regulatory Guide 1.33, Appendix A (7.a) recommends procedures for activities, including those for the control of radioactivity (for limiting materials released to environment and limiting personnel exposure).

Procedure 320.1, "Demineralized Water Transfer System," Step 3.2.3, states "Portions of the Demineralized Water System are contaminated. Per Safety Evaluation SE-000523-011, Demineralized Water cannot be used outside any contained radiological control area (i.e.; yard, flush water overboard) unless specifically sampled just prior to use and found to have no detectable activity."

Contrary to the above, on April 14, 1997, the demineralized water transfer system was used to flush the service water system radiation monitor (discharge flowpath) without finding that the demineralized water system had no detectable activity, resulting in a small release of potentially contaminated demineralized water to the discharge canal.

 NRC Regulatory Guide 1.33, Appendix A (8.b.2.aa) recommends procedures for activities, including those for area radiation monitor calibrations.

Surveillance procedure 621.3.005, "High Radiation Monitor (Reactor Building Isolation) and Area Radiation Monitor Power Supply Calibration," steps 6.6.14 and 6.7.14, for reactor building ventilation exhaust radiation monitors A-1 and A-2, respectively, require that <u>IF</u> Upscale or Downscale Trip Points are not within the tolerances specified (13 mR/hr), <u>THEN</u> adjust the trip points.

Contrary to the above, on January 22, 1997, while performing surveillance procedure 621.3.005, instrument technicians miscalibrated both the A-1 and A-2 reactor building ventilation exhaust radiation monitor upscale trip setpoints to 30 mR/hr and 40 mR/hr, respectively.

This is a Severity Level IV violation (Supplement I).

2. 10 CFR 50.59 requires, in part, that the licensee maintains a record of changes in facility, to the extent that these changes constitute a change as described in the safety analysis report. These records must include a written safety evaluation, which provides the basis for determination that a change does not involve an unreviewed safety question.

Contrary to the above, the licensee made a change to the updated final safety analysis report in 1989, regarding a single failure vulnerability of the standby gas treatment system with regard to automatic actuation, which reduced filter efficiency due to loss of system heaters. However, since 1989, the licensee did not perform, and therefore did not have a record of, a written safety evaluation, which provided the basis for the determination that the change did not involve an unreviewed safety question.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Incorporated is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector within 30 days of the receipt date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at King of Prussia, Pennsylvania this 3rd day of July, 1997