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Writer's Direct Dial Number:

March 30, 1988

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
IE Inspection 50-219/88-02  
Response to Notice of Violation

In accordance with 10CFR2.201, Enclosure A provides GPUN's response to the Notice of Violation contained in IE Inspection Report 50-219/88-02. GPUN does not concur with Violation A. GPUN does concur with Violation B.

In addition to the Notice of Violation, the NRC staff has requested additional information concerning low temperature in the reactor building. This request represents a significant effort within a short period of time to address the broad scope concerns identified in the staff's request. In relation to this event, GPUN submitted on February 25, 1988 Licensee Event Report No. 88-001 and, enclosed herein, a response to the Notice of Violation. These submittals describe GPUN's evaluation of the event and detail extensive actions being taken to address both GPUN's and NRC's concerns, including continuing evaluations. Immediate actions have been taken to prevent recurrence of this event and evaluations of broader scope have been initiated.

GPUN's response to violation B discusses those actions taken with regard to the biennial procedure review process. Licensee Event Report (LER) 88-001 identifies additional action being taken to upgrade procedures and evaluate long term consequences with regard to structures and systems. Temperature limitations discussed in the updated FSAR are being reviewed in conjunction with the evaluation being conducted.

As in the past, the results of GPUN's continuing evaluations will be made available to NRC inspection personnel. A premature, accelerated effort to further respond to the staff's request for information, with attendant commitments as requested, will not serve to benefit plant safety. The actions taken to date have achieved compliance with the regulation and assure the continued safe operation of the Oyster Creek Station.

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If you should have any questions, please contact Mr. George W. Busch of our Licensing Department at (609)971-4909.

Very truly yours,

  
Peter B. Friedler  
Vice President and Director  
Oyster Creek

PBF/GB/dmd  
Enclosure  
(0449A)

cc: Mr. William T. Russell, Administrator  
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Mr. Alexander W. Dromerick, Project Manager  
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ENCLOSURE A

Response to Notice of Violation

Violation A:

The Code of Federal Regulations 10 CFR 50.59 permits licensees to make changes in the facility as described in the safety analysis report provided a written safety evaluation is performed which provides the bases for the determination that the change does not involve an unreviewed safety question. Station Procedure 125, Conduct of Plant Engineering, Section 6.8 requires written safety evaluations per 10 CFR 50.59(a) for any change to the plant configuration whether or not the item is considered nuclear safety-related.

Contrary to these requirements, on January 27, 1988, it was determined no written safety evaluation was performed or other compensating operational or design measures implemented for the inoperative condition of the reactor building heating system relative to its design basis documented in the updated FSAR. This condition, outside of the design basis, was permitted to exist for approximately two years.

Response:

GPUN does not concur in this violation.

The low temperatures experienced in the reactor building were a result of inoperability of the steam heating coil in the building heating and ventilation system. This event was exacerbated by a rebalancing of the reactor building ventilation system which had been accomplished prior to this event. Freezing of the instrument lines occurred in a location where air flow from a supply duct was channeled around the lines which froze. Due to the system rebalancing, the supply air flow had been increased resulting in higher air flows in the lower levels of the shutdown cooling area. As discussed in the inspection report, immediate actions were taken to initiate standby gas treatment which significantly reduced the intrusion of outside air. Subsequent actions taken were to establish periodic monitoring of building temperatures and to repair the steam heating coil.

As a result of additional review of this event, it was determined that inoperability of the steam heating coil was partially due to a misinterpretation of maintenance test data during the period in which the plant was being prepared for cold weather conditions. GPUN has initiated engineering evaluations for the Heating and Ventilation System, structural and equipment temperature limitations, and a review of the procedures for

cold conditions. The cold weather preparation plan for Oyster Creek is being reviewed and revised to assure that adequate measures are taken to prepare the station for low temperature conditions. Operating procedures have also been reviewed and revised where necessary to correct deficiencies related to cold weather conditions and to assure the procedures are accurate and appropriate with regard to limits and instrumentation.

The cited regulation, 10 CFR 50.59, allows the licensee to make changes or conduct tests and experiments without prior NRC approval provided such evaluations do not involve a change to the Technical Specifications or an unreviewed safety question. The sole purpose of this evaluation is to determine if a proposed change, test, or experiment requires NRC approval prior to implementation.

The inoperability of steam heating coils in the Reactor Building Ventilation System was a result of mechanical deficiencies and there was never any intent to change the configuration or operation of the system. Therefore, 10 CFR 50.59 is not applicable.

Additionally, the design bases of the Reactor Building Ventilation System is stated in the Updated FSAR, Section 9.4.2.1 entitled "Design Bases." In this section the design objectives are stated as:

1. To provide a controlled environment so that the maximum allowable ambient temperature for standard rated electrical equipment (104°F) is not exceeded; and
2. To regulate the static pressure within certain areas of the plant so as to minimize the spread of airborne radioactive contaminants from controlled to uncontrolled areas and to provide safe disposal of airborne contaminants.

The design bases also states that the HVAC systems were designed to cope with a minimum temperature of 10°F (drybulb). The design bases recognizes that low temperature conditions would be exceeded 2.5 percent of the time. Therefore, nothing in the design basis requires that reactor building temperature be maintained at any minimum temperature, only that the temperature never exceed 104°F.

Violation B:

Technical Specification 6.8.1, specifies that written procedures shall be maintained. Station Procedure 107, Procedure Control, Section 3.3.4 requires a periodic review of procedures be conducted once every two years. This review is defined as a documented reading of the procedures to assure it continues to satisfy its objective in a manner consistent with plant requirements. In addition, the reviewer should contact a "user" of the procedure (operator, technician, etc.) for feedback on adequacy of the procedure.

Contrary to the above, a review of Station Procedure 329, Reactor Building Heating, Cooling, and Ventilation System, on January 29, 1987 indicates that inadequate procedural reviews have been conducted in that Step 2.3.6 describes a reactor building temperature indicator on Panel 11R in the control room. This temperature indicator appears never to have been installed, consequently the procedural error appears to have existed for approximately twenty years.

Response:

GPUN concurs with the violation.

Plant operating procedures are revised as a result of modifications, technical specification changes, errors identified by users, or errors identified during the biennial review. The error in station procedure 329, "Reactor Building Heating, Cooling, and Ventilation System," was not identified during any of these reviews. During initial plant design, it was planned to provide the instrumentation referred to in the procedure, however, during construction this instrumentation was eliminated. Since then, subsequent reviews of the procedure failed to identify the discrepancy.

Subsequent to the violation, operating procedures were reviewed to determine the extent of similar procedure errors. A Group Shift Supervisor, a Group Operating Supervisor, and three Control Room Operators reviewed all 200 and 300 series procedures related to operating the turbine and reactor plants. Their intention was to (1) identify limits that were inappropriate, unsupported or clearly not maintained; and (2) to identify procedures that could not be executed due to references to equipment that does not exist in the plant. Two instances related to limits and two related to equipment were found and are being corrected. The last biennial review of procedure no. 329 was conducted in January, 1987. Since then, in July 1987, station procedure 107 was revised to include contacting the user of the procedure to obtain feedback on the adequacy of the procedure. As of March 2, 1988, Operations' procedures will be reviewed by the user of the procedure. This will significantly improve the biennial procedure review process.

Since operation of the Oyster Creek plant began, major improvements to the safety review process, plant modification procedures, and periodic review requirements have emphasized requirements covering review of procedures as an integral part of these reviews. Operational experience to date indicates there are no major problems in the area of procedural adequacy. Where errors or needed reviews are identified, procedures are updated as necessary.

In response to this event, GPUN will issue additional guidance, including a discussion of this event to departmental Managers re-emphasizing review responsibilities. Additional guidance to reviewers will be included in Station Procedure 107 which will re-enforce the need to obtain user feedback during the biennial reviews of procedures.

Full compliance was achieved on March 2, 1988 by revising procedure 329 to delete reference to the reactor building temperature instrument.