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September 28, 1998
1940-98-20516

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
Facility Operating License No. DPR-16
Revision to 10 CFR 50.54(f) Response Commitments No. 7 and 8

- References: (1) GPU Nuclear Letter 6730-97-2011, "Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Re: Adequacy and Availability of Design Basis Information," dated 2/10/97.
- (2) GPU Nuclear Letter 6730-97-2240, "Additional Information Related to 10 CFR 50.54(f) Response," dated 12/5/97.

On July 8, 1998, GPU Nuclear announced that it had identified no buyer for the OCNGS and that a final decision on the future of Oyster Creek will be made sometime after the New Jersey Board of Public Utilities makes a decision on GPU's restructuring filing. Based upon these developments, GPU Nuclear has determined that some projects whose primary purpose was to keep the plant running through its licensed life will be deferred, some 17R Outage (September 1998) projects will be streamlined, and more effort will be focused on the eventual decommissioning of Oyster Creek. The deferred work would include the planning for a refueling outage in the Fall, 2000 and certain modifications, inspections and testing not required to support safe operation of the plant through the fall, 2000.

The review of work which could safely be deferred one operating cycle or whose scope could safely be reduced has identified some specific actions which represent voluntarily commitments made to the NRC in References 1 and 2 and due to be completed by 9/30/98. The commitment

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changes being made are the deletion of Commitment 7, originally made in Reference 1 and later modified by Reference 2, and the revision of Commitment 8 made in Reference 1. The commitments are no longer required to support safe operation of the plant through the Fall, 2000. The changes will focus more effort on the eventual decommissioning of Oyster Creek. Should GPU Nuclear decide to operate Oyster Creek beyond the year 2000, these commitments will be revisited and revised accordingly.

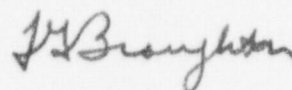
Commitment 7 stated that GPU Nuclear would "Complete/upgrade at least four System Design Basis Documents (SDBD) and revise currently issued SDBDs as dictated by the results of a one time detailed FSAR review" by 9/30/98. The completion/upgrade of four additional system design basis documents does not significantly add to the existing safe plant operation for the remaining planned two year operating period of Oyster Creek. As stated in Reference 1, "...based on experience in operating the plant since 1969 and as demonstrated by the results of internal and external assessments, GPU Nuclear has concluded that there is reasonable assurance that the Oyster Creek design bases are understood, available to those who must access them, and generally reflected in plant documentation." Existing SDBDs are reviewed as part of the biennial update of the FSAR.

Commitment 8 currently states that GPU Nuclear would "Develop and implement a one time detailed FSAR review" by 9/30/98. The review completed to date includes those FSAR sections concerning the Secondary Containment Functional Design, Reactor and Turbine Building Ventilation, Standby Liquid Control, Standby Gas Treatment, Control Rod Drive and Turbine Building Closed Cooling Water Systems. Although some discrepancies were identified and corrective actions initiated, it was determined that there were no safety consequences for any discrepancies found to date. This commitment is being revised to "Develop and implement a one time detailed FSAR review focusing on systems, structures and components required to support decommissioning". The revised completion date is 6/30/99. This change will focus resources on decommissioning requirements and confirm and ensure accurate design and licensing basis information is available to support decommissioning planning and activities.

Attachment 1 provides an updated list of GPU Nuclear's 10 CFR 50.54(f) response commitments.

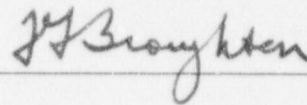
If you have any questions or comments on this matter, please contact Michael Laggart, Corporate Regulatory Affairs at (973) 316-7968.

Very truly yours,

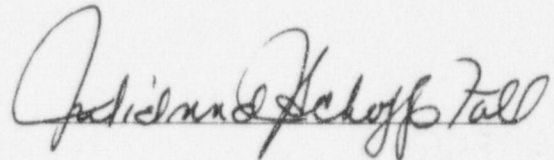


T. Gary Broughton
President
GPU Nuclear, Inc.

I, T. Gary Broughton being duly sworn, state that I am President and Chief Executive Officer of GPU Nuclear, Inc. and that I am duly authorized to execute and file this response on behalf of GPU Nuclear. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other GPU Nuclear employees and/or consultants. Such information has been reviewed in accordance with company practices and I believe it to be reliable.



T. Gary Broughton
President
GPU Nuclear, Inc.



A Notary Public of NJ

JULIENNE J. SCHOFFSTALL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires June 24, 2002

c: Administrator, NRC Region 1
Senior Resident Inspector, Oyster Creek
Oyster Creek NRC Project Manager

Attachment 1**Commitments and Status**

Commitment Number	Description	Status / Completion Date
1	Develop Engineering Division Procedure EP-045 to improve the review and update process in the following areas: <ul style="list-style-type: none"> • Establish a periodic review of the SDBDs and FSAR to ensure consistency. • Provide improved process for SDBD maintenance and control. • Develop improved guidelines and process for biennial FSAR update. 	Complete
2	Consolidate resolution tracking for SDBD and SSFI open items by entering them into the Deviation Report process to achieve a timely and effective resolution.	Complete
3	Complete procedure revisions for and training on an improved process for control and update of calculations and TDRs.	Complete
4	Utilize established processes to evaluate those systems under consideration to establish future design basis reconstitution activities.	Complete
5	Conduct personnel training on design basis issues and the new FSAR update process (EP-045).	Complete
6	Develop a specific plan and schedule for improving setpoint basis documentation/ references.	Complete
7 (Deleted)		

Attachment 1 (con't)

Commitments and Status

Commitment Number	Description	Status / Completion Date
8 (Revised)	Develop and implement a one time detailed FSAR review focusing on systems, structures and components required to support decommissioning.	6/30/99
9	Implement an improved corrective action system common to both Oyster Creek and TMI-1 which will include: <ul style="list-style-type: none">• Clear requirements for timeliness of deficiency reporting, response to deficiencies and escalation.• Use of a graded approach to establish the significance of the deficiency and clear requirements for reporting and resolving deficiencies.• Requirements for verification of corrective action completion prior to closeout of significant conditions adverse to quality.	Complete

SDBD = System Design Bases Document

TDR = Technical Data Report