

APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation
Oyster Creek Nuclear Generating Station

Docket No. 50-219
License No. DPR-16

As a result of the inspection conducted February 7 - March 19, 1988, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained.

Station Procedure 130, Conduct of Independent Safety Reviews and Responsible Technical Reviews by Plant Review Group states, reviews are to be accomplished on a timely manner and that records of reviews are prepared, distributed and maintained. In addition, Station Procedure 103 Station Document Control states, "The review cycle of documents should be thorough and expeditious."

Contrary to the above, a review of Station Procedure 301 Nuclear Steam Supply System, step 2.2.1, states the pressure across the main steam isolation valves will be equalized to \leq 200 psid prior to opening during a restart with the reactor vessel pressurized but, Station Procedure 201.2, Plant Heatup to Hot Standby, step 3.1.5, states the pressure across the isolation valves will be equalized to \leq 50 psid prior to opening during restart with the reactor vessel pressurized. A procedure change request to correct this discrepancy written on August 18, 1987 had not been completed as of March 1, 1988.

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

- B. Technical Specifications 6.8.1 requires that written procedures shall be established, implemented and maintained. Station Procedure 675.1.001, Revision 14, Inspection of Bergen-Patterson Hydraulic Snubbers, requires, in part, "...the components tested by this procedure meet Technical Specification requirements for operability if the following criteria are met. If any are not met consider the affected components inoperable and follow the requirements of Technical Specification section 3.5.A.8 and Procedure 104... The snubber or its mounting hardware has no defects which would affect operation of the snubber and no defects that cannot be corrected with the snubber in place."

Contrary to the above, snubbers NQZ-1-S8, NQZ-1-S9, NQZ-1-S10, and NQZ-1-S12 had all been replaced and deficiencies in their mounting hardware corrected on or before February 2, 1988 without declaring the snubbers inoperable as required by the station procedure during the time they were out of the system for repair.

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

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- C. 10 CFR 50, Appendix B, Criterion 16 and Section 8.0 of the Operational Quality Assurance Plan for Three Mile Island Unit 1 and Oyster Creek Nuclear Stations require, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, the licensee has failed to take prompt corrective action to address an angular misalignment of snubber NQ-2-S8, which exceeded manufacturer and procedural requirements. This nonconformance was identified on November 11, 1986 and again on December 16, 1987 during visual snubber surveillances conducted in accordance with Station Procedure 675.1.001. As of February 23, 1988, the nonconforming condition had still not been corrected, more than 15 months after initial identification.

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

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit to this office, within 30 days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.