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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Generic Letter 83-28

Pursuant to your letter of January 22, 1988 addressing Item 2.2 of Generic Letter 83-28, please find attached GPU Nuclear's response to the request for additional information. It should be noted that this response is consistent with Revision 2 of the OQA Plan submitted for your review and approval on April 15, 1988. Should there be any questions, please contact Mr. M.W. Laggart at (201) 316-7968.

Very truly yours,

R. F. Wilson
for R. F. Wilson
Vice President
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RFW/JDL/pa(6343f)

cc: Mr. William T. Russell, Administrator
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ATTACHMENT

OYSTER CREEK NUCLEAR GENERATING STATION

GENERIC LETTER 83-28

1. Item 2.2.1 (Program):

Guideline:

Licensees/applicants should confirm that an equipment classification program exists which provides assurance that all safety-related components are designated as safety-related on plant documents such as drawings, procedures, system descriptions, test and maintenance instructions, operating procedures, and information handling systems so that personnel who perform activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints.

Evaluation:

The license failed to state that his equipment quality classification list includes all safety-related components or that it forms a single, consistent and unambiguous source of classification information as specifically requested by sub-item 2.2.1.2.

Conclusion:

The licensee's response is incomplete. They should complete their program by revising their response to include all safety-related components and to describe how the information system is controlled as requested in sub-item 2.2.1.2.

Response:

GPUN has completed the review of the classified systems listed in the QCL and broken those systems down to the component level (pumps, valves, cabinets, instruments and equipment). The components were then classified based on their function (Nuclear Safety Related or Regulatory Required or Other). There are approximately 25,000 components at Oyster Creek, of which approximately 5,000 are classified NSR or RR. As modifications are made to the plant, new components are classified in accordance with procedure EP-011 "Quality Classification List".

The new component classification system includes requirements for marking documentation. Procedures established for document control prescribe the following requirements:

- a. Drawings, design descriptions and specifications for items, parts and materials designated as Nuclear Safety Related shall be marked as such.
- b. Documents which prescribe how to perform activities related to NSR/RR Components are marked as within "QA Plan Scope". These documents typically are those termed policies, plans and procedures.

The concern that personnel perform differently when they are aware that they are working on NSR or RR components and are therefore guided by procedures within the scope of the QA Plan is not the focus we prefer. Rather, GPUN personnel are to follow procedures to perform tasks regardless of the classification of the procedure, therefore this awareness is not necessary for the worker.

2. Item 2.2.1.2 (Information Handling System):

Guideline:

The licensee's response should confirm that the equipment classification program includes an information handling system that is used to identify safety-related equipment and components. Approved procedures which govern its development, maintenance, and validation should exist.

Evaluation:

The licensee's response identified their information handling system as a listing of safety-related components and described how it was originally prepared. The response did not describe how new safety-related items are entered on the list, how changes in the classification of listed items are made, how the listed items are verified, how unauthorized changes to the listing are prevented nor how the listing is maintained as a single, consistent, and unambiguous source of component classification information.

Conclusion:

The licensee should supplement their response to describe procedures which control how the list of components is revised, validated, how unauthorized changes are prevented and how the listing is maintained as a single, consistent and unambiguous source of component classification information.

Response:

New items are classified and added to the Quality Classification List via a Quality Classification form provided in 5000-ADM-7313.02 (EP-11) "Quality Classification List". A review for classification is required for new components to determine their classification (namely Nuclear Safety Related, Regulatory Required or Other). This is done concurrent with the assignment of equipment tag numbers. Since the group responsible for the tagging of components is also in the same group that is responsible for maintaining the QCL, close coordination is achieved. Once the component is reviewed by the Engineering organizations responsible, it is sent to the Qualification Classification Group for review and entry into the computerized database which contains the classified structures, systems and components. The original development program for components has been

reviewed by the Quality Classification Group in accordance with procedure 5000-ADM-7313.02 (EP-11). The on-going validation is performed by independently reviewing the originating organizations classification data in accordance with EP-11 by the Quality Classification group. The only group which has the computer security to edit the computerized database is the Quality Classification Group. The computerized database is the single source of information concerning classification. The methodology for classification is consistently applied through the application of 5000-ADM-7313.02 (EP-11).