

MAR 3 1986

Docket No. 50-219

GPU Nuclear Corporation
P. R. Clark, President
100 Interpace Parkway
Parsippany, New Jersey 07054

Gentlemen:

Subject: Systematic Assessment of Licensee Performance (SALP) No.
50-219/85-99

Thank you for your letter dated December 5, 1985 wherein you presented, as a follow-up to our October 28, 1985 meeting, a detailed response to the Oyster Creek SALP for the period May 1, 1984 through June 30, 1985. We appreciate the effort you made to address our concerns and intend to follow-up your corrective actions in future inspections. The SALP report, our transmittal letter, and your response letter are enclosed and will be placed in the Public Document Room.

In your letter you requested we reconsider the Category 3 rating in Maintenance. We recognize that a substantial amount of effort has gone into and continues to be applied in improving performance in this area subsequent to the 10R outage. However, observations by our inspectors during the evaluation period indicated that your efforts have been slow in producing results. Also, many of the efforts described in your SALP response represent future plans and the positive effects they will have on overall performance at Oyster Creek. We appreciate your descriptions of plans for improvement, which are an important aspect of the SALP process. But since the SALP process evaluates performance based on observations during the assessment period, the plans you described would not provide basis for changing the assessment for the expired SALP period. Therefore, we consider our Category 3 rating of your performance in maintenance to be appropriate at this time. We are also somewhat concerned regarding instances where your response discounted items as not being "safety issues". In our SALP, we gave you perceptions wherein the safety issue was the underlying attitudes and philosophies involved; we hope this point has not been missed.

The point is made several times in your letter, but most strongly in the Technical Support response, that you feel increased NRC understanding of your organization would be of benefit to us in assessing your performance. It is important that you appreciate the NRC inspection program is a systematic, sampling type program that is similarly applied to all licensees. It is designed to evaluate performance regarding nuclear safety and we feel confident in our ability to make assessments in this area based on our current inspection program. Further, because our inspections programs at both TMI and Oyster Creek have evaluated corporate and technical support, we feel our current understanding of your organization is good. We do, however, continually strive to improve the inspection program and are, in fact, attempting to provide increased inspection of corporate based support at all facilities, which should further enhance our understanding of your programs.

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In discussing EMRV problems, you cited a failure by the vendor to provide you with information, but do not detail measures to improve your control over vendors. We plan to discuss this item with you during the next site visit by regional management.

In your review of Operations, you state our determination of the root cause of many of the LER's was not accurate, however, you recognized in the same paragraph that a judgement was made by the NRC in evaluating the LERs and establishing root cause. We do not feel our root cause evaluation to be in error. Whether the cause is procedural inadequacy/administrative control or interface problems, appears to be a matter of perspective. From our perspective, the procedural inadequacies and lack of administrative controls stem from underlying inter- and intra-department interface problems.

Furthermore, in your response to Section F, Quality Assurance, you emphasized the relatively few QC holdpoints missed as compared to those accomplished, however, our concern with regard to the missed QC holdpoints was your failure to take action after QC self-identified the problems and issued a QDR. Although your response to the particular NRC violation regarding failure to follow procedures governing QDR's indicated you understood the NRC concern, your more recent SALP response does not reflect such understanding.

In summary, we felt the SALP meeting was a beneficial interchange of thoughts and ideas. Regarding corrective actions, we intend to verify that you meet the various commitment dates stated in your response. As you requested, we reconsidered the rating of Category 3 in Maintenance but concluded no change is warranted.

Your cooperation is appreciated.

Sincerely,

Original signed by
Thomas E. Murley

Thomas E. Murley
Regional Administrator

Enclosures:

1. NRC Region I SALP, Oyster Creek Nuclear Generating Station, August 20 and 30, 1985
2. NRC Letter, T. Murley to P. Fiedler, dated October 11, 1985
3. GPU Nuclear letter, P. Clark to T. Murley, December 5, 1985

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Blough
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*RI:DRP
Kister
2/ /86

RI:DRP
Starostecki
2/18/86

RI:ORA
Allan
2/21/86

RI:RA
Murley
3/2/86

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*SEE PREVIOUS CONCURRENCES

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Kister
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Starostecki
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Allan
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cc w/encl:

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Licensing Manager, Oyster Creek
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Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New Jersey
Chairman Palladino
Commissioner Roberts
Commissioner Asselstine
Commissioner Bernthal
Commissioner Zech

bcc w/encl:

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