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September 19, 1988
5000-88-1637

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
Seismic Floor Response Spectra

The purpose of this letter is to summarize and describe GPUN's effort to develop updated seismic floor response spectra for the Oyster Creek Reactor Building and how this effort impacts our commitment to have all systems which fall within the scope of IE Bulletins 79-02 and 79-14 meet design criteria by the end of the cycle 12 refueling outage. The cycle 12 refueling outage is currently scheduled to commence on Oct. 15, 1988 with twelve to fourteen week duration.

In July of 1987, GPUN first met with the NRC staff in Bethesda, Maryland to discuss the development of a new, more technically appropriate seismic floor response spectra which would eliminate past confusions concerning the Oyster Creek seismic design basis and would maintain consistency for future analyses. At that meeting GPUN stated that the methodology (i.e., Soil Structure Interaction (SSI) & use of SEP ground spectra) for the new floor response spectra would be reviewed under 10 CFR 50.59 and the new spectra would be applied to the current reanalysis being undertaken for IE Bulletins 79-02 and 79-14.

GPUN and the NRC have agreed that a more technically appropriate floor response spectra utilizing a state of the art technique would be beneficial. Although the development of the floor response spectra is being implemented under 10CFR50.59, we have been and will continue to be in close contact with the NRC staff for its guidance and concurrence. Follow-up meetings were held with the staff on September 3, 1987, December 21, 1987, March 8, 1988 and May 23, 1988. Correspondence in response to NRC questions has been submitted at various times during the past year. In response to the staff's letter of December 16, 1987, GPUN is currently developing confirmatory site specific ground spectra with Weston Geophysics Corporation in an effort to verify the acceptability of using the SEP ground spectra in the SSI analysis. NRC staff and their consultant also audited the newly developed floor response spectra methodology at the offices of GPUN's consultant, URS/Blume & Associates Engineers on November 17 and 18, 1987.

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Although agreement with the NRC regarding the new floor response spectra is expected, GPUN had anticipated that the issue would have been resolved by this time. GPUN had previously committed that all systems, which fall within the scope of IE Bulletins 79-02 and 79-14, would meet design criteria by the end of the cycle 12 refueling outage. Rather than continue to design support upgrades for all elevations using the original seismic criteria, it was decided by GPUN that utilization of the new floor response spectra was more appropriate.

While GPUN anticipates satisfactory resolution of the issues surrounding the new spectra with the NRC staff by the end of the Cycle 12 refueling outage, we nevertheless recognize the possibility that resolution might not be achieved by that time, or that the resolution may increase the acceleration values of the new floor response spectra. Should either of these situations occur our commitment to have all systems meet design criteria by the end of the cycle 12 refueling outage, would not be fully realized. We consider this to be acceptable, however, for the following reasons:

- The methodology used to generate the new floor response spectra is consistent with the applicable sections of the proposed Standard Review Plan, NUREG's and Regulatory Guides. This methodology represents a considerable technical improvement over the methodology used for the previous seismic analyses.
- All piping systems will satisfy ANSI B31.1 design criteria by restart from the cycle 12 refueling outage based on the new floor response spectra. The majority of the piping models (approximately 70%) currently satisfy ANSI B31.1 allowables based on the original seismic criteria. The remaining piping models (approximately 30%) currently satisfy operability criteria when using the original seismic criteria.
- The majority of supports (approximately 86%) currently satisfy the FSAR design criteria. Attachment 1 is a pie chart for IEB 79-14 support upgrades as of September 9, 1988, which shows greater detail.
- All support upgrades based on the new floor response spectra will be completed by restart from the cycle 12 refueling outage. It should be noted that, with only several exceptions, all supports which are being upgraded have been designed to the greater load from either the new or original seismic criteria.
- The majority of IE Bulletin 79-02 anchorage inspections or upgrades (approximately 90%) has been documented. Attachment 2 is a pie chart for 79-02 anchorage inspections as of September 9, 1988, which shows greater detail.
- All IEB 79-02 anchorage inspections or upgrades based on the new floor response spectra will be completed by restart from the cycle 12 refueling outage.
- Should resolution with the NRC regarding the floor response spectra cause an increase in accelerations which exceed the response spectra currently being used, the few remaining upgrades would be completed, in accordance with an Integrated Schedule.

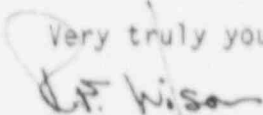
- Public health and safety is not compromised. In fact, safety margins are now more clearly defined with the new floor response spectra.

Of the 691 pipe supports covered by the IE Bulletins, only 28 upgrades required by the original seismic criteria would not be performed since these upgrades are not necessary when considering new floor response spectra. However, eight upgrades identified by using the new seismic input will be performed during the upcoming cycle 12 refueling outage.

We are currently in the process of resolving questions raised by the NRC staff during our last meeting on May 23, 1988. We plan to meet with the staff in the near future to discuss our response to the questions and any comments you may have concerning this letter.

If there are any questions regarding this letter which you need to discuss prior to the meeting, please contact Mr. Michael W. Laggart at (201)316-7968.

Very truly yours,



R. F. Wilson
Vice President
Technical Functions

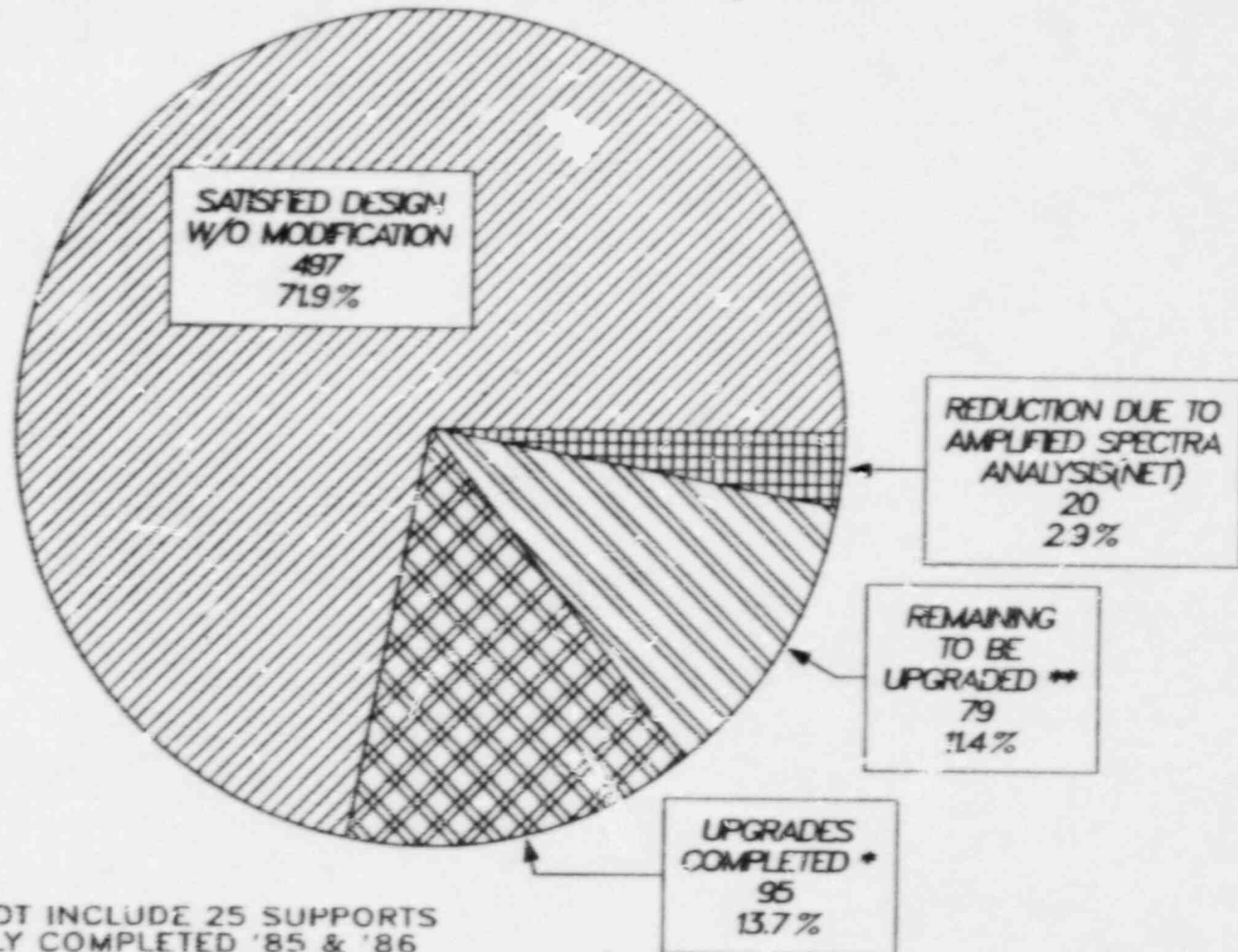
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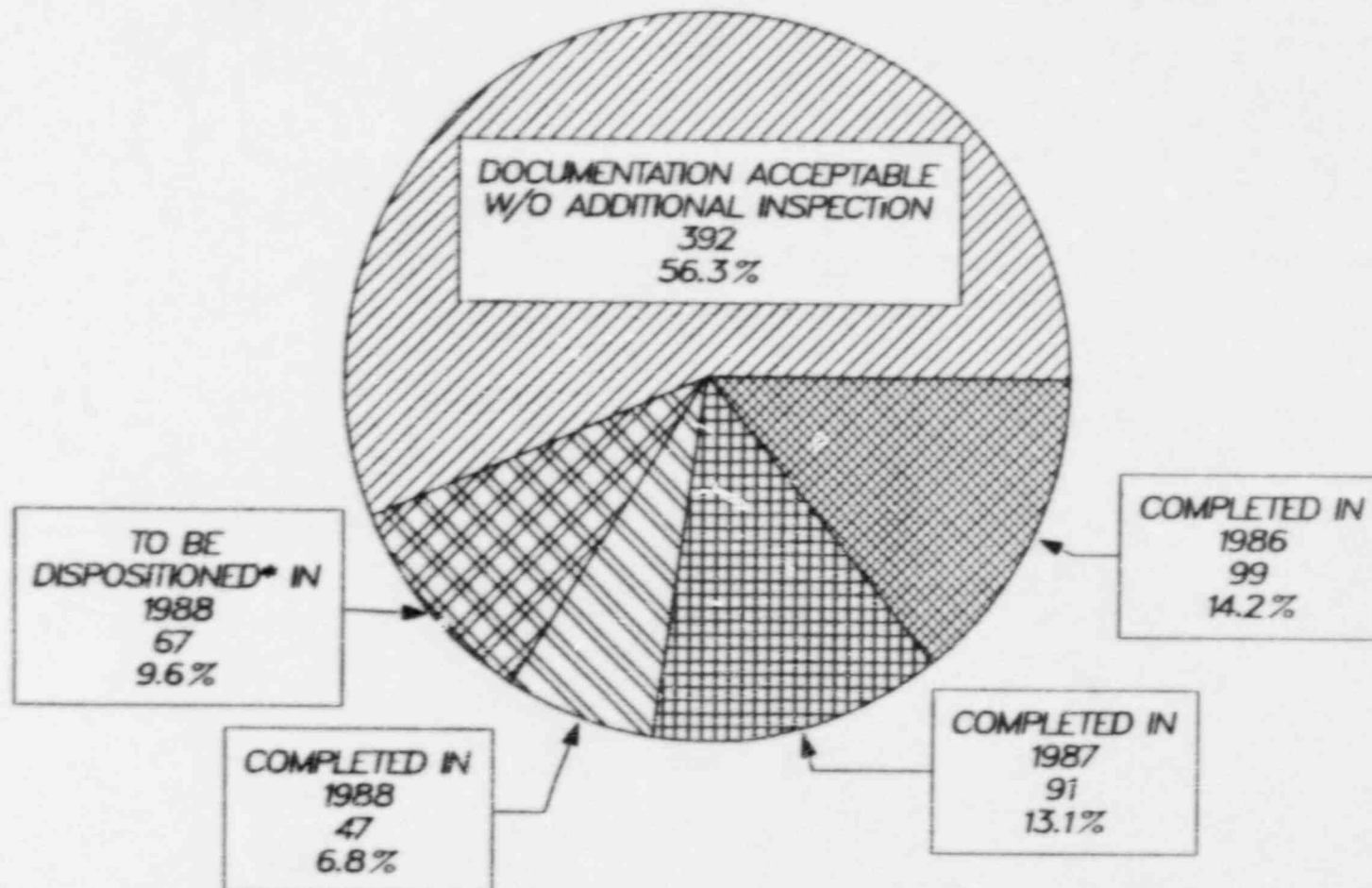
Mr. Alex Dromerick
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79-14 SUPPORT UPGRADES STATUS AS OF SEPTEMBER 9, 1988



- * DOES NOT INCLUDE 25 SUPPORTS PARTIALLY COMPLETED '85 & '86
- ** DOES NOT INCLUDE 5 NEW SUPPORTS

79-02 ANCHORAGE INSPECTIONS STATUS AS OF SEPTEMBER 9, 1988



* DISPOSITION MEANS THAT THE ANCHORAGE WAS EITHER INSPECTED OR UPGRADED TO SATISFY HIGHER LOADS.