

GPU Nuclear

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May 27, 1986 RFW-0883

Mr. John A. Zwolinski, Director BWR Project Directorate #1 Division of BWR Licensing U.S. Nuclear Regulatory Commission Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station Docket No. 50-219 Reactor Protection System Switch Replacement

In the NRC safety evaluation for Amendment No. 95 to the Oyster Creek Nuclear Generating Station Technical Specifications, the NRC documented its November 15, 1985 requests of GPUN to 1) establish additional administrative controls to verify communication between the new non-indicating switches and the reactor vessel; 2) report promptly to the staff any loss of operability of the reactor water level instrumentation; and 3) prior to restart from the 11R outage, provide either visual means of indication or a justification for not needing visual indications to allow for daily channel checks. Additional administrative controls through revisions to the surveillance procedures were implemented. All relevant information has been transmitted to the NRC through both verbal and written channels. Prompt reporting of non-operabilities has been accomplished through the use of 1 hour notifications following all unsatisfactory surveillance tests. Additionally, Licensee Event Report 86-01 was submitted to the NRC when redundant switches were found to be simultaneously beyond acceptance criteria.

The third request by your staff was to provide either visual indications to allow daily channel checks or a justification for not performing the identified checks. The response to this request requires a brief review of actions taken by GPUN to date. During the 10M maintenance outage at the Oyster Creek Nuclear Generating Station, a new design differential pressure (d/p) switch, manufactured by Static-O-Ring (SOR), was installed in two reactor protection system applications to address EQ and setpoint drift concerns. These applications were: 1) the Low Reactor Water Level function; and 2) the Low Low Reactor Water Level function. Formalized plans, procurement actions, and requisite engineering had been completed to place similar SOR switches in 12 other Reactor Protection applications.

Nuclear Reactor Regulations Re: Reactor Protection System Switch Replacement Page 2

Subsequent to restart from the 10M outage, several concerns and anomalies were noted with the installed Low Reactor Water Level functions. Unpredictable drifts in setpoint and deadband were observed. The switches installed in the Low Low Reactor Water level function which were a different model number, did not exhibit these problems.

Accordingly, GPUN has made the following decisions:

- 1) The SOR switches in the Reactor Water Level Low functions have always been planned for replacement by an analog trip system. Two of the analog transmitters will be paralleled with differential pressure gauges and the other two transmitters will have remote indication in the control room. This will serve the dual purpose of providing level indication to allow daily channel checks, and replacing the questionable SOR switches with a time tested alternative.
- Differential pressure gauges will be installed across each Low Low level sensor. These gauges will be installed across each switch to allow daily channel checks to be performed.
- 3) The remainder of the project to replace the existing d/p and pressure switches with SOR switches has been deferred. Additional time is required to determine whether the root cause of the failures of the SOR switches in the low level function is a specific or a generic concern. GPUN has been working closely with SOR to assist in this determination.

During the 10M outage, two Emergency Technical Specification Change Requests were submitted to the NRC and subsequently approved as Amendment Nos. 91 and 95. Amendment No. 91 was valid only until the end of the 10M outage, and as such is no longer in effect. Amendment No. 95 is valid until restart from the 11R outage, presently scheduled for the end of October 1986. GPUN will not be requesting either of these amendments to be applicable past their existing expiration dates.

A Technical Specification Change Request is anticipated for the analog trip system which will be installed during the 11R outage. The request will further define surveillance requirements for an analog trip system. The Change Request will be submitted by August 15, 1986. Nuclear Reactor Regulations Re: Reactor Protection System Switch Replacement Page 3

If any further information is required, please contact Mr. John Rogers of my staff at (609)971-4893.

Very truly yours. R. F. Wilson Vice President Technical Functions

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NRC Resident Inspector Oyster Creek Nuclear Generating Station Forked River, NJ 08731