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November 6, 1987

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
SEP Topic II-3B Flooding Potential and Protection
Requirements

During the integrated assessment of SEP Topic II-3B "Flooding Potential and Protection Requirement" (IPSAR 4.1(3)), the Staff concluded that water level instrumentation at Oyster Creek Nuclear Generating Station (OCNGS) intake canal is inadequate. Accordingly, the staff recommended that automatic water level instrumentation, with remote indication in the control room, be provided in the canal so the operator could implement emergency shutdown procedures when the probable maximum hurricane flooding (PMHF) level occurs.

GPUN letter dated April 21, 1986 requested a cancellation of the automatic water level gauge installation since an adequate source of make-up water is assured by filling storage tanks (located above PMHF level) prior to potential flooding conditions and plant procedure 2000-ABN-3200-31 "High Winds" has been modified to require the canal water level monitoring (visual observation) at the intake structure with specific directions for high water level conditions.

In response to our April 21, 1986 letter, the staff issued a letter on November 28, 1986 stating that GPUN should address provisions for monitoring possible low water level in the intake canal to determine if it is near or below the service water pump suction elevation.

In our subsequent discussions with the staff additional information was provided concerning low water level monitoring at the service water pump suction location by the intake structure.

The OCNGS operational response to low water level is detailed in OCNGS Operating Procedure 2000-ABN-3200.32, "Response to Loss of Intake".

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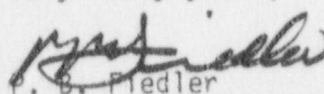
Two gauges (PI-SWS-1 and PI-SWS-2) are available at the intake structure to monitor potential low water level in the canal. These gauges are read routinely (i.e., every shift) by a plant operator and the readings are recorded on the Intake Area Tour Sheet. Based on previous observations, low water in the intake canal is expected to normally occur gradually over a period of days.

Procedure 2000-ABN-3200.32 contains operator actions required at various water levels in the intake canal in order to regain level as well as to protect safe operation of the plant.

The procedure also instructs the operator to monitor service water discharge pressure indication in the control room to avoid possible service water pump cavitation. The service water pumps are expected to reach their minimum required water level at -0.5 feet MSL (Mean Sea Level) at the intake structure. A loss of service water may occur at this level and the operator is instructed to follow OCNGS Operating Procedure 2000-ABN-3200.18 "Service Water Failure". The procedure instructs the operator to shutdown the plant, if the Service Water System cannot be returned to operation.

In our recent meeting with the staff, partial copies of the procedures were provided. In the meeting, the staff requested documentation of our position by a formal submittal. We believe that adequate provisions already exist at Oyster Creek to cope with both low and high water level conditions in the intake canal.

Very truly yours,



P. B. Piedler
Vice President and Director
Oyster Creek

PBF/YN/pa (5398g)

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