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March 21, 1989  
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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)  
Docket No. 50-219  
Preliminary Safety Concern Process

NRC Inspection Report 88-38, which in part addressed the Preliminary Safety Concern (PSC) Process for Oyster Creek, documented a concern that some PSCs have been closed in which valid safety issues may still exist. The report recommended that GPUN management consider reviewing previously closed safety concerns to determine if other safety issues may still be open and valid. In addition, Inspection 89-06 also addressed the issue of previously closed PSCs. Results of the above inspections were discussed with NRC Region I management on March 17, 1989. During this discussion it was requested that GPUN document their review of previously closed PSCs for outstanding safety concerns prior to restart from the current refueling outage. This review was conducted and a description of the process and results are presented in this letter.

The PSC process is a review mechanism to identify and resolve concerns and complements other review mechanisms that exist within GPUN. Examples of such mechanisms include plant tours; surveillance testing; drawing verification program; electric load study; system functional audits; plant modification process; The General Office Review Board (GORB); operating experience program; safety review process; independent on site safety review efforts; augmented inservice inspection and testing program; deviation reports; and quality assurance audits. In addition, various external systems contribute to the identification and resolution of problems. These include IMPO Significant Event Reports and Significant Operating Events Reports; Vendor Service Information Letters; and NRC initiated Bulletins, Information Notices, Inspection Reports, and Generic Letters.

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The intent of the PSC process is to address a specific concern that is identified by the PSC originator. During resolution of the specific concern, however, personnel involved in the process address other concerns that may arise. Problems have been identified and addressed as a result of the initial PSC. In the past, the implementing procedure for the PSC process concentrated on reportability. However, emphasis in the last several years has been directed toward determining if a safety concern exists. A major revision to the procedure governing PSCs which addresses both reportability and safety concern aspects is in progress. In essence, improvements have and are being made to the PSC process.

The total number of PSCs concerning Oyster Creek since early 1983 is 104. Of these, there are currently seven (7) classified as open or still under review. For purposes of restart it is our practice to review PSCs that have yet to be dispositioned for impact on safe operation. The review is conducted as part of the Restart Certification process and for the open PSCs the decision regarding what actions need be taken, if any, prior to restart is made by three (3) upper level management personnel.

There are five (5) which have received extensive review during the past several weeks and which have been the subject of NRC inspection activities. The subjects involved with these PSCs are:

- Standby Gas Treatment single failure criteria for automatic initiation.
- Automatic Depressurization system in conjunction with a Core Spray system out of service.
- Containment Spray System.

The remaining closed PSCs were subjected to an internal re-review to determine if there were concerns which may not have been adequately addressed during the original PSC review. This review determined if any concerns existed which affected safety and required action prior to restart.

A group of approximately 30 technically qualified individuals was assembled. The group consisted of knowledgeable management and engineering personnel from the Licensing, Engineering and Design, and Systems Engineering Departments. Each PSC was discussed. PSCs were excluded from further consideration based on the group's experience and knowledge of each individual PSC and those PSCs which were considered to have had a more rigorous review for closure by a documented analysis. The remaining 35 were then each assigned to a technical reviewer for reevaluation. In addition, Oyster Creek Shift Technical Advisors (STAs) reviewed these PSCs independently for impact on the Emergency Operating Procedures (EOPs).



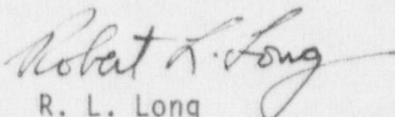
Upon completion of the individual re-evaluations the entire review group was reconvened to review the results. Nine (9) PSCs were identified as requiring further review.

Following the further review, the review group was reconvened to thoroughly discuss these nine (9) PSCs. For this session the group was augmented with two (2) members of the Oyster Creek General Office Review Board (GORB) three (3) members from the Nuclear Safety Assessment Department (NSAD) including the NSAD Director; the Vice President and Director of Technical Functions; the Vice President and Director of Planning & Nuclear Safety (also a member of the Oyster Creek GORB). These individuals provided an additional safety perspective and oversight function for the PSC re-review effort. The group also discussed concerns raised by the STAs in regard to the EOPs.

The results of this review concluded that five (5) PSCs required follow-up action to completely resolve the original concern. There were, however, no safety issues identified that would prevent restart. During the review of one PSC, it was deemed prudent to increase the surveillance frequency for the torus to drywell bypass leakage rate measurement test. This change is to assure that conditions do not develop during the operating cycle which would result in unacceptable bypass leakage. It should be pointed out that the actions being taken exceed regulatory requirements.

The re-review, as described above, provides reasonable assurance that there are no unidentified safety issues associated with the Oyster Creek PSCs. Should you have any questions regarding this letter, please contact me or Mr. M. Laggart of my staff at (201) 316-7968.

Very Truly Yours,



R. L. Long  
Director, Planning & Nuclear Safety

RLL/crb

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