



GPU Nuclear Corporation

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April 3, 1989

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

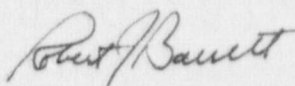
Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-279
Response to NRC Bulletin 88-10,
"Non-Conforming Molded Case Circuit Breakers"

On November 27, 1988, the U.S. Nuclear Regulatory Commission issued NRC Bulletin 88-10, "Non-Conforming Molded Case Circuit Breakers". Reporting Requirement No. 1 specified that requisite data be submitted by April 1, 1989. Attachments I, II, and III to this letter provide the GPU Nuclear response to that requirement.

If you should require any further information, please contact Mr. John Rogers at (609) 971-4893.

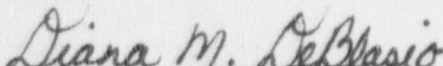
Very truly yours,


for E. E. Fitzpatrick
Vice President and Director
Oyster Creek

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PDR ADDCK 05000219 PNU
G

EEF/JJR/aa
0736A:01
Attachments

Sworn to and Subscribed
before me this 3rd day
of April 1989.


A Notary Public of New Jersey

DIANA M. DeBLASIO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 6-5-91

IE21
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cc: Mr. Alexander W. Dromerick, Project Manager
U.S. Nuclear Regulatory Commission
Division of Reactor Projects I/II
Washington, DC 20555

Mr. William T. Russell, Administrator
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

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

ATTACHMENT I

The following information is submitted as required by NRCB 88-10, "Reporting Requirements":

Reporting Requirement 1:

All holders of operating licenses are required to provide a written report by April 1, 1989, that:

- a. Confirms that only molded-case CBs that meet the criteria of Item 7 of the actions requested are being maintained as stored spares for future use in safety-related applications.

GPUN Response to Reporting Requirement 1.a

The Oyster Creek warehouse was visually inspected and procurement documentation was reviewed. Any molded case circuit breaker within the scope of this bulletin that did not meet the criteria of Action Item 7 was placed in a Plant Engineering "Hold" condition. Material on hold is not available for issuance to the plant without further Plant Engineering approval.

- b. Summarizes the total number, manufacturer, model number, and to the extent possible the procurement chain of those CBs that could not be traced to the CBM in items 1 and 4 of the actions requested. For installed CBs, also identify each system in which they are/were installed. If Item 4 of the actions requested has not been completed by April 1, 1989, due to the schedule for tests in Item 3 of the actions requested, this information should be updated within 30 days of the completion of Item 4 to address those additional CBs that could not be traced to the CBM.

GPUN Response to 1.b

At the present time, Action Item 4 is not applicable to the Oyster Creek site. (Refer to Attachment II). The specified information requested by this reporting requirement is contained in Attachment III.

- c. Confirms that Items 1, 2, 3, 4, 5, 6 and 7 of the actions requested have been completed or will be implemented as requested.

GPUN Response to 1.c:

Refer to Attachment II for complete details of the actions taken in response to this bulletin.

Reporting Requirement No. 2

All holders of operating licenses are required to submit a report that summarizes available results of tests conducted in accordance with items 3 and 5 of the actions requested within 30 days after startup from the first and second refueling outages beginning after March 1, 1989. For CBs that pass these tests, the only information required is the number, manufacturer, model number, and to the extent possible the procurement chain of CBs tested (summary report format is acceptable). For CBs that fail these tests(s), these reports should indicate the test(s) and the values of test parameter(s) at which the failure(s) occurred, as well as the corresponding manufacturer, model number, and to the extent possible, the procurement chain.

GPUN Response to Reporting Requirement 2

The specified report(s) will be submitted prior to 30 days after restart from the next refueling outage, 13R, (and the subsequent refueling outage, 14R, if required).

Reporting Requirements 3 and 4 are applicable to holders of construction permits only, and as such, no response from GPU Nuclear is required.

ATTACHMENT II

The following information is submitted as required by NRCB 88-10, Reporting Requirement 1.c.:

Action 1

- a. Identify all molded-case CBs purchased prior to August 1, 1988, that are being maintained as stored spares for safety-related (Class 1E) applications or commercial grade CBs that are being maintained as stored spares for future use in safety-related applications; this includes CBs purchased from a CBM or from any other source. If the number of these stored spare CBs is less than 50 at a nuclear plant site, then randomly select CBs purchased between August 1, 1983 and August 1, 1988 that have been installed in safety-related applications as replacements or modifications to form a minimum sample of 50 CBs per nuclear plant site.

GPUN Response to Action 1.a.

A record search of procurement documents and a visual inspection of the Oyster Creek warehouse was performed. A total of 72 molded case circuit breakers subject to the scope of NRCB 88-10 were identified and located in the warehouse. As this number exceeds 50, no additional installed breakers were required to establish the required sample size.

- b. Verify the traceability of these CBs.
- c. Identify the number, manufacturer, model number, and to the extent possible the procurement chain for all those CBs identified in (1a) that cannot be traced to the CBM. For installed CBs, also identify each system in which they are/were installed.

GPU Nuclear Response to Action 1.b, 1.c

The record search, which had been conducted, was supplemented by contacting intermediate vendors to obtain the requisite certifications to the original manufacturer. Sixty-eight (68) breakers had fully verifiable traceability to the original manufacturer leaving 4 breakers subject to further requirements of NRCB 88-10.

Action 2

All holders of operating licenses who identify installed CBs per Item 1 above or Item 4 below that cannot be traced to a CBM are requested to prepare, within 30 days of the completion of each item, an analysis justifying continued operation until Items 1 through 5 of the actions requested in this bulletin have been completed.

GPU Nuclear Response to Action 2

No installed circuit breakers were included in the GPUN response to Action Item 1. At the present time, Action Item 4 is not applicable to the Oyster Creek Site. Therefore, Action 2 is not presently required at the Oyster Creek site.

Action 3

All addressees who identify 80 percent or more CBs traceable to the CBM per Item 1 above are requested to test the CBs that are not traceable to the CBM in accordance with the test program described in Attachment 1. Any installed CBs that fail any of these tests should be replaced with CBs that meet the criteria of Item 7 of the actions requested or CBs that pass all tests in accordance with the testing program described in Attachment 1. If more than 10 percent of the CBs tested fail any of the tests described in Attachment 1, continue with Item 4; otherwise, proceed to Item 6 of the actions requested.

Holders of operating licenses are requested to complete this testing program before startup from the first refueling outage beginning after March 1, 1989. Holders of construction permits are requested to complete this testing program before fuel load.

GPUN Response to Action 3

As 95% of the identified breakers have verifiable traceability to the original manufacturer, Action Items 4 and 5 are not presently applicable. The 4 circuit breakers specified in Action Item 1 are documented in Attachment III. Requisite testing will commence prior to startup from the next Oyster Creek refueling outage, 13R.

Action 6

Information generated while performing the actions requested in Items 1, 2, 3, 4, and 5 above should be documented and maintained for a period of 5 years after the completion of all requested actions.

GPUN Response to Action 6

Information generated while performing the specified steps will be properly documented and retained for a minimum of 5 years after the completion of all actions.

Action 7

With the exception of actions taken in response to Items 3 and 5 of the actions requested above, molded-case CBs installed in safety-related applications after August 1, 1988 should be:

- a. Manufactured by and procured from a CBM under a 10 CFR 50, Appendix B, program; or
- b. Procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related by the licensee or others using an acceptable dedication program. The NRC encourages addressees to significantly upgrade their dedication programs through a joint industry effort to ensure their adequacy and consistency. The NRC will monitor these industry initiatives and if they are not sufficient or not timely, or if problems with the dedication of commercial grade equipment for safety-related use continue, the NRC will take appropriate regulatory actions.

GPUN Response to Action 7

Procurement policies and procedures have been reviewed to ensure compliance with the requirements of Action Item No. 7 and revisions will be made where appropriate. Additionally, GPUN is working with NUMARC to ensure that the Oyster Creek Nuclear Generating Station dedication program addresses the concerns identified in NRCB 88-10.

ATTACHMENT III

Breakers Which Do Not Have Verifiable Traceability:

Manufacturer: Gould

Model No.: PN P1515

Number procured : 4

Traceability Chain: Procured by: GPU Nuclear

1) Procured from: Comsip, Inc.
3030 Red Hat Lane
P.O. Box 981
Whittier, CA 90601

Purchase Order: GPUN No. 025731
10CFR50 Appendix B applies
10CFR21 applies

2) Procured by: Comsip, Inc.

Procured from: Associated Wholesale Electric
14245 Artesia Boulevard
LaMirada, CA 90638-5859

Purchase Order: Comsip No. 1230-60
Letter of Confirmation from
Associated Wholesale Electric
stating that no alterations
were performed on the
breakers