



A PECO Energy/British Energy Company

Ron J. DeGregorio
Vice President

AmerGen Energy Company, LLC
Oyster Creek
U.S. Route 9 South
P.O. Box 388
Forked River, NJ 08731-0388
Telephone: 609 971 2300

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US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Change of Commitment

NRC correspondence dated August 21, 1981, identified a violation for activities at the Oyster Creek facility. This violation indicated that the safety function of the reactor building to suppression chamber vacuum breakers was compromised in that they were unable to open fully as required by Technical Specification Section 3.5.A.4.a. Specifically, one vacuum breaker in each line (two parallel lines) was obstructed from fully opening as a result of a contractor having erected scaffolding in the area.

By letter dated September 21, 1981, GPUN responded to this violation with a number of corrective actions to prevent recurrence. These included a commitment to have a requirement for specific jobs to be "walked down" by Operations Supervision where additional controls for the protection of plant equipment were stipulated. This review requirement had a sign-off provided in each procedure as a prerequisite to starting the job. This requirement was included in Oyster Creek procedure 105.2. Since that time, work processes which perform work and provide work controls which assure proper performance of work activities have been improved significantly.

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Work processes and practices have significantly changed since the time of the original commitment. Better controls have been instituted and personnel have received more extensive training over the years. As a result, procedures are more explicit and better coordinated. Furthermore, plant walk-downs by supervisors and management personnel are conducted on a routine basis. During these tours, observation of plant system status and abnormal plant conditions are emphasized.

For more than two years, a Corrective Action Process (CAP) has been in effect which would require a report if an instance of scaffolding blocking equipment operation was observed. No instances of scaffolding blocking the operation of plant equipment have been identified during this period. Therefore, based on the improved work control processes and the lack of any recurrences over a significant period of time, the requirement for an operations walk-down is being left to the discretion of operations supervision.

If you should have any questions please contact Mr. John Rogers, of my staff, at 609.971.4893

Very truly yours,



Ron J. DeGregorio
Vice President, Oyster Creek

RJD/JJR

cc: Administrator, Region I
NRC Project Manager
Senior Resident Inspector