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October 19, 1979

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Subject: Followup to Reviews Regarding the Three Mile
Island Unit 2 Accident

Reference: (a) Division of Operating Reactors Letter
9/13/79, Follow-Up Actions Resulting
from the NRC Staff Reviews Regarding
Three Mile Island Unit 2
(b) T. D. Kennan's (Chairman, BWR Owners
Group) letter to D. Eisenhut dated October 17,
1979.
Enclosure: (1) JCP&L positions regarding
NUREG 0578 Implementations at the Oyster
Creek Nuclear Generating Station

You have requested that all operating reactor licensees implement the recommendations contained in NUREG 0578, as modified and/or supplemented by items (a) through (f) and within the schedule constraints specified in enclosure (6) of reference (a).

The owners of General Electric Boiling Water Reactors have reviewed all relevant material on the subject and have concluded that the issue of NUREG-0578 implementation can best be handled within the framework of the currently existing General Electric Boiling Water Reactor Owners Group, which was created specifically to address the issues raised by the Three Mile Island accident of significance to boiling water reactors.

Well defined acceptance criteria for many of the recommendations of NUREG-0578 are needed in order to ensure timely implementation. The recent clarification meetings and discussions have been of benefit, but others may be necessary to develop adequate acceptance criteria. These acceptance criteria, when fully developed, may impact implementation schedules due to hardware availability as well as affecting the ability to optimize utilization of scheduled refueling outages for such implementation. Thus, we believe a degree of flexibility is necessary in the implementation schedules for good cause shown. However, within the constraints described above, it is our intent to meet the requirements and schedules of NUREG-0578 described in reference (a) except as noted in enclosure (1). These exceptions are based upon two considerations peculiar to Oyster Creek.

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- (1) Since Oyster Creek has its annual refueling outage scheduled for January 5, 1980, certain hardware related tasks will be completed prior to startup vice January 1, 1980.
- (2) Since Oyster Creek is included in the Systematic Evaluation Program (SEP) it would be premature to implement certain NUREG-0578 modifications which are currently in the NRC's systematic review process.

The Owners Group intends to work as a unit to evolve detailed schedules and acceptance criteria for the majority of the NUREG items. It is our intention to meet with you in the near future as a member of the Owners Group to discuss the details and schedules for NUREG implementation for our facility to the extent that it can be handled as an Owners Group item. The Chairman of our Owners Group will be in contact with you to establish a set of communication guidelines to govern this activity and to schedule the meeting.

Reference (a) also contains a requirement that we commit to comply with the Emergency Preparedness recommendations of enclosures 7 and 8. It is our present intention to meet the schedules based upon our current understanding of the requirements.

We trust this letter is responsive to your requirements at this time. If additional clarification of our position is necessary, please advise us.

Very truly yours,


Ivan R. Finfrock, Jr.
Vice President

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Enclosure (1)
October 19, 1979

JCP&L'S POSITIONS REGARDING NUREG 0578 IMPLEMENTATION AT THE
OYSTER CREEK NUCLEAR GENERATING STATION

1. Item 2.1.1 - Emergency Power Supply Requirement

Although NUREG 0578 specifically states that this item pertains to PWR's we have reviewed the applicability of its intent to the Oyster Creek design. Since Oyster Creek has no PORV block valves, nor pressurizer heaters or level instruments, only the power supplies to the PORVs themselves and the reactor vessel water level instrumentation must be considered. Since both of these systems are safety related they currently are powered from emergency busses and therefore no modifications are required.

2. Item 2.1.2 - Relief and Safety Valve Testing

JCP&L concurs with the position of the BWR owners group as stated in Reference (b). It is felt that the concerns regarding safety/relief valve performance have been addressed and no additional testing is required.

Regarding Oyster Creek the following specific actions will be taken:

a) procedures will be reviewed to ensure that guidance exists to respond to stuck open safety valves or relief valves.

b) procedures will be reviewed to ensure that they address prevention of inadvertent overfilling of the reactor vessel.

c) a control grade high reactor vessel water level trip of the feedpumps will be installed during the spring 1981 refueling outage.

3. Item 2.1.3a - Direct Indication of Valve Position

JCP&L concurs with the position of the BWR owners group as stated in Reference (b), and therefore plans to install pressure switches in both of the manifolded relief valve tailpipes. This modifications will be installed during the refueling outage scheduled to begin on January 5, 1980.

4. Item 2.1.3.b - Instrumentation for Inadequate Core Cooling

JCP&L concurs with the position of the BWR owners group as stated in reference (b). The need for additional instrumentation and/or procedural guidance will be reviewed in connection with the analyses being performed to satisfy item 2.1.9.

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5. Item 2.1.4 - Diverse Containment Isolation

The diversity of parameters sensed for the initiation of containment isolation and the manual reset feature will be verified and/or corrected by the completion of the January 5, 1980 refueling outage.

The definition of essential and non-essential systems will be systematically reviewed under topic VI-4 of SEP which is scheduled to begin in October '79. Design modifications which may be required to update this system will be integrated with other required SEP modifications.

6. Item 2.1.5a - Dedicated H₂ Control Penetrations

The only hydrogen control system at Oyster Creek is the containment purge system. A review of this system indicates that it currently meets the requirements of this item and therefore no modifications are planned.

7. Item 2.1.5c - Recombiners

Not applicable since a recombiner system is not part of Oyster Creek's design.

8. Item 2.1.6 a - Systems Integrity for High Radioactivity

A leak reduction program which will implement all practical leak reduction measures will commence shortly and will be concluded prior to the end of the refueling outage scheduled for January 5, 1980. A preventative maintenance program will also be initiated to ensure that leakage is kept to a minimum.

9. Item 2.1.6.b - Plant Shielding Review

A shielding survey which focuses on personnel safety during post accident conditions will be performed by January 1, 1980. The design of new shielding, the redesign of existing shield walls, and the identification of equipment requiring improved environmental qualification will be completed at a later time. A more definite schedule will be provided by January 1, 1980.

Design modifications requiring hardware changes, relocations, and shielding will not be implemented until related SEP modifications, eg. pipe whip, turbine missiles, building seismic capabilities etc. have been assessed to assure integration.

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10. Items 2.1.7 a & b - Auxiliary Feedwater Flow Indication and Automatic Initiation

Not applicable to Boiling Water Reactors

11. Item 2.1.8a - Post Accident Sampling

JCP&L intends to meet the design review schedule and satisfy the requirements of this item as clarified in the regional meetings during the week of September 24, 1979. Hardware modifications will be implemented on schedule so long as they do not require substantial shielding redesign, in which case they will be assessed with related SEP modifications to assure integration.

12. Item 2.1.8b - High Range Radiation Monitors

JCP&L intends to meet the schedule and satisfy the requirements of this item as clarified in the Regional meetings of the week of September 24, 1979.

13. Item 2.1.8c - Improved Iodine Instrumentation

JCP&L intends to meet the schedule and the requirements of this item.

14. Item 2.1.9 - Transient and Accident Analysis

The specific requirements are being developed in a continuing series of meetings between the BWR Owners Group and the NRC's Bulletins and Orders Task Force. The implementation of emergency procedures and retraining will be done on the agreed upon schedule.

15. Item 2.1.9 - Containment Pressure Monitor

JCP&L plans to meet the schedule and requirements of this item.

16. Item 2.1.9 - Containment Water Level

JCP&L plans to meet the schedule and requirements of this item with one minor exception. Rather than monitoring suppression pool level to the bottom, level will be monitored to the lowest level to which it could be pumped during emergency conditions. It is felt that this approach satisfies the intent of the NRC's requirements.

17. Item 2.1.9 - Containment Hydrogen Monitor

JCP&L plans to meet the schedule and requirements of this item.

18. Item 2.1.9 - RCS Venting

JCP&L concurs with the position of the BWR owners group as stated in references (b). It is felt that the 5 power operated relief valves which are safety grade and located on the main steam lines can adequately vent noncondensable gases from the reactor vessel. The location of the penetrations into the reactor vessel is such that an accumulation of gases above this point will not affect natural circulation cooling of the core.

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The reactor vessel is also vented through normally open manual valves to the main steam lines.

Other high points are in the steam lines to the isolation condenser. Although these lines are presently vented to the Main Steam System through remotely operated valves, the valves and their power supplies are not safety grade. It is JCP&L's intention to upgrade this vent system to the requirements of this item and to exhaust the gases (during a casualty only) to the containment instead of the main steam system. JCP&L plans to implement this modification by January 1, 1981.

19. Item 2.2.1.a - Shift Supervisor's Responsibility

JCP&L intends to meet the schedule and satisfy the requirements of this item.

20. Item 2.2.1.b - Shift Technical Advisor

JCP&L intends to meet the schedule and satisfy the requirements of this item.

21. Item 2.2.1.c Shift Turnover Procedures

JCP&L intends to meet the schedule and satisfy the requirements of this items.

22. Item 2.2.2.a - Control Room Access Control

JCP&L intends to meet the schedule and satisfy the requirements of this item.

23. Item 2.2.2.b - Onsite Technical Support Center

JCP&L intends to meet the schedule and satisfy the requirements of this items as clarified in the topical meeting in Bethesda on October 10, 1979.

24. Item 2.2.2.c - Onsite Operation Support Center

JCP&L intends to meet the schedule and satisfy the requirements of this item.

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