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Jersey Central Power & Light Company
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960
(201) 455-8200

October 11, 1979

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Inspection No. 79-16

This is in response to your letter of September 20, 1979 regarding the inspection conducted by Mr. N. J. Blumberg on August 14-17, 1979 at the Oyster Creek Nuclear Generating Station. In Appendix A to your letter there are noted certain activities which were not conducted in full compliance with the Oyster Creek NRC Facility License. Our responses to the noncompliance items identified, one catagorized a deficiency and the other an infraction, are given below.

Item A:

Technical Specification (TS) 4.5.k.1.b(1) requires that the capability of each Standby Gas Treatment System (SGTS) circuit be demonstrated at least once per 18 months by verifying that the pressure drop across a HEPA filter be equal to or less than the maximum allowable pressure drop indicated in TS Figure 4.5.1.

TS 3.5.B.4 requires, in part, that with both SGTS circuits inoperable, a reactor shutdown be initiated and the reactor be in the cold shutdown condition within 24 hours.

Contrary to the above, on April 27, 1978, the SGTS #2 circuit was not considered inoperable following performance of Procedure 651.4.005, Standby Gas Treatment System HEPA Filter ΔP Test, for which test results indicated the HEPA filter pressure drop across filter F-1-10 to be in excess of that allowable by TS Figure 4.5.1. Further, during the period April 27, 1978 to May 2, 1978, TS 3.5.B.4 was not implemented in that, with SGTS #1 circuit declared inoperable due to low circuit flow rate and a high pressure drop across filter F-1-7, a reactor shutdown was not initiated. Results of surveillance tests performed May 2, 1978, following the replacement of filters F-1-7 and F-1-10, demonstrated both circuits to be operable.

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Response:

The partially loaded filters which had a differential pressure greater than the limits of TS Figure 4.5.1 were replaced and tested by May 2, 1978.

This test of the SGTS filter differential pressure was the first conducted under the revised TS 4.5.k (Amendment 14 to the License), issued by the NRC on March 22, 1976. Amendment 14, however, when issued, was missing page 4.5-5b and Figure 4.5-1. These pages were eventually received on November 9, 1976. Thus, the first test was conducted in April 1978.

It was recognized following this event that the 18-month interval is not adequate to detect filter differential pressure increase prior to exceeding the TS limit. Procedure 651.4.001 was, therefore, revised on June 8, 1978 to include a check of filter differential pressure during each 10-hour surveillance test run. This will prevent recurrence of filter high differential pressure.

This event was previously reported to the NRC in the form of a Licensee Event Report as Reportable Occurrence No. 50-219/78-05/3L-0, dated May 26, 1978. SGTS #2 was considered operable by senior members of the operating staff at the time based on the logic that the system was capable of passing the required flow even though the ΔP on one of its HEPA filters was higher than the TS limit. All members of the operating staff who become involved in making such determinations now recognize and accept that the TS requirements for both flow and ΔP must be satisfied for the system to be considered operable.

Full compliance with this infraction has been achieved.

Item B:

TS 6.8.1 states in part, "Written procedures shall be established, implemented and maintained..."

1. Procedure Number 636.2.001, Diesel Generator Load Sequence Timers, written to satisfy TS 4.7.A.2, requires in part, that the diesel generator load sequence timers for the service water pumps be automatically actuated and functionally tested each refueling outage.

2. Procedure Number 636.2.006, Diesel Generator Monthly Battery Surveillance, written to satisfy TS 4.7.A.5, requires the specific gravity of each cell to be greater than 1.225.

10 CFR 50, Appendix, Criterion XI states in part, "Test results shall be documented and evaluated to assure test requirements have been satisfied."

Contrary to the above, procedures were not implemented in that:

1. Data from the surveillance test performed December 1, 1978, on diesel generator #2, did not indicate satisfactory operation of the sequence timer for Service Water Pump 1-B. A mechanical fault in the pump breaker prevented the timer from performing as designed. Repair and functional testing of the Service Water Pump breaker was documented; however, no test data could be located to substantiate proper operation of the sequence timer.

2. Data from surveillance tests performed June 13, 1979 and July 6, 1979 contained specific gravity readings for cell-13 and cell-16 which were less than 1.225. Although each surveillance test contained a statement that an equalizing charge had been initiated as corrective action, no documentation could be located to demonstrate that the specific gravity readings were increased to greater than 1.225.

Response:

B.1. The subject surveillance test identified several malfunctions as were reported in the associated reportable occurrence. One malfunction was the failure of the service water pump breaker to trip and, thus, the timer for the pump was not exercised on repowering of the bus. Per the surveillance procedures, the discrepant pump was identified on a job order written on December 2, 1978 to effect corrective action. Attached to the job order was a QASL job order back sheet used to identify post maintenance testing and results. Due to the several corrective maintenance activities conducted as a result of the surveillance test, the actual job order for the pump breaker and the job order back sheet were not completed to indicate the maintenance actually performed.

It is important to note that the incomplete job order had been identified internally prior to IE Inspection 79-16. During the conduct of preventive maintenance for related breaker problems, the reviewing engineer found the incomplete job order, investigated the cause for the discrepancy and was implementing appropriate corrective actions at the time of IE Inspection 79-16. The following lists the corrective steps already taken and the remaining step to be taken:

1. Corrective Steps Taken:

An investigation of the incomplete job order was conducted by the reviewing engineer in the period May/June 1979. The results indicated that no procedural inadequacy existed. Informal meetings were held by the reviewing engineer with the operations and maintenance supervisors, as well as all of the foremen involved in the job order process. The content of these meetings covered the identified problem, the causes for deficiency, and the appropriate paragraphs of existing procedures which address the special conditions surrounding the occurrence.

Results:

a. All personnel involved were made aware of the situation and the applicable procedure paragraphs to be used.

b. The reviewing engineer has since found all processed job orders in adherence with meeting subject matter and existing plant procedures.

c. IE Inspection 79-16 provided further evidence that maintenance activities were being conducted as per procedures and requirements.

2. Additional Corrective Action:

a. The informal meetings will be formalized by issuance of a memo covering the subject matter for the review and acknowledgment of those personnel responsible for maintenance documentation.

b. The job order will be closed with necessary explanation and testing documentation.

3. Completion Date:

November 10, 1979

B.2. Analysis and discussion of surveillance procedures for routine battery care indicate that more specific instructions should be added to the procedures involved.

1. Corrective Steps Taken:

All personnel involved have been notified of the discrepancy and the required courses of action for surveillance deviations.

2. Additional Corrective Action:

Battery surveillance procedures will be revised to provide more specific instructions for disposition of surveillance discrepancies.

3. Completion Date:

November 10, 1979

Very truly yours,

Ivan R. Finfrock Jr.

Ivan R. Finfrock, Jr.
Vice President

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