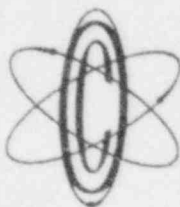


OYSTER CREEK



NUCLEAR GENERATING STATION



Jersey Central Power & Light
Company is a Member of the
General Public Utilities System

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September 8, 1981

Mr. Dennis Crutchfield
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Crutchfield:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
NUREG 0737 Clarification

Since the publication of NUREG 0737, we have been utilizing large amounts of material and human resources in our effort to fulfill the requirements of that document. As we have progressed in our design of some of the required modifications, we have found it necessary to clarify previous commitments and to take exception with some of the NUREG requirements.

By letter dated February 10, 1981, we transmitted to you our position on NUREG 0737, item II.K.3.21 "Restart of Core Spray". In that submittal we had proposed to modify our core spray logic to allow for a semi-automatic restart. Since that time, we have made substantial progress in the design of the modification and have also had the opportunity to factor in those applicable portions of the BWR owner's group evaluation on this topic. The BWR owner's group report states, "These negative impacts include a significant escalation of control system complexity and restricted operator flexibility when dealing with anticipated events." We have come to that same conclusion, in that this modification may have a negative impact on safety. We, therefore, are changing our proposed modification to only allow for remote/manual restart of Core Spray.

By letter dated January 1, 1981, we committed to install a containment high range radiation monitor meeting the requirements of NUREG 0737. It is still our intention to complete this modification during our next refueling/maintenance outage; however, we do take exception with the requirement stated in Table II.F.1-3 of NUREG 0737 which required in situ calibration of the monitors to 10 R/hr with a calibrated radiation source. Because of the physical location of the containment high range monitor, their calibration with such a large radiation source would be extremely difficult and would pose a very serious personnel safety hazard. It is our position that these monitors can be properly calibrated in the laboratory and then calibrated by electronic signal substitution once installed.

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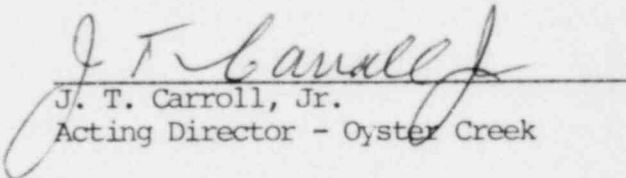
September 8, 1981

Also, please note that by letter dated April 30, 1981, we provided you with our interpretation of NUREG 0737, item II.K.3.14 "Isolation Condenser System Isolation Logic" stating that we felt this was not applicable to Oyster Creek and by letter dated August 27, 1981, we provided you with our justification for not modifying the Oyster Creek Purge and Vent Isolation logic as suggested in NUREG 0737, item II.E.4.2.

We would request your timely review on these NUREG items so we may take the resources currently being utilized on them and assign them to higher priority items.

If you have any questions on these topics, please contact Mr. James Knubel, Manager-BWR Licensing, at (201) 299-2264.

Very truly yours,


J. T. Carroll, Jr.
Acting Director - Oyster Creek

JTC:JK:dls