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March 12, 1993

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

Dear Sirs:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 92-25
Reply to a Notice of Violation

In accordance with 10 CFR 2.201, the enclosed provides GPU Nuclear's response to the Notice of Violation identified in NRC's Inspection Report 92-25.

Should you have any questions, please contact Patty Arcaro, Administrator FSAR at 201-316-7748.

Very truly yours,

R. L. Long
Vice President and Director
Corporate Services

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

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VIOLATION:

10 CFR 50.71(e) requires that the Final Safety Analysis Report (FSAR) shall be updated periodically to assure that the information in the FSAR contains the latest material developed.

Contrary to the above, design information related to a 1984 plant modification of torus suction strainers for the core spray and containment spray systems was not included in the FSAR.

This is a severity level V violation (Supplement VII).

RESPONSE:

GPUN concurs with the violation as stated in that pursuant to 10 CFR 50.71(e)(3), the initial revision to the original Facility Description and Safety Analysis Report (FDSAR) did not reflect the 1984 modification to the torus suction strainers.

The torus suction strainer modification was completed during the time the first FSAR update was in progress and the change was inadvertently missed by our contractor. It should be noted that the original FDSAR did not contain the current level of detailed design information. The first FSAR update included extraneous information from various sources such as the original Burns & Roe OCNGS Facility Description Manual. The level of detail incorporated may have been excessive of what is normally required.

The update/upgrade process which was identified in our December 1990 submittal letter, has significantly improved the accuracy of the FSAR. In addition, the current update process provides continual improvement in that a general review of each section of the updated FSAR by cognizant technical personnel is performed. Reviews are not only done as a result of modifications, but also all content is expected to be reviewed for accuracy. In this case, unless the torus suction strainer modification package was reviewed against the updated FSAR description, or an actual walkdown was compared with the updated FSAR description, it is unlikely this error would be discovered in subsequent update reviews or via other initiatives such as during the preparation of design basis documents. This update process is not intended to be a verification program for all design details; however, the process does capture the significant changes that are implemented since the last update and is in accordance with 10 CFR 50.71(e)(2), (4). We believe the process will also bring continued improvement in FSAR content.

The strainer information contained in Table 6.3-3 of the FSAR has been updated to reflect current strainer design and will be included in Update 8 scheduled for submittal in August 1993.