



**GPU Nuclear**

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Writer's Direct Dial Number:

July 9, 1982

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
IE Inspection No. 82-06

In accordance with the provisions of 10 CFR 2.201, Attachment A to this letter presents our responses to the Notice of Violation transmitted in your letter of May 20, 1982. In addition, the enclosure addresses your request that we describe actions taken or planned to improve the effectiveness of our management control system to help prevent recurrence of similar violations.

If there are any questions regarding the enclosed information, please contact me or Mr. Michael Laggart of my staff at (609) 971-4643.

Very truly yours,

Peter B. Fiedler  
Vice President and Director  
Oyster Creek

Sworn to and subscribed to before me this 9th day  
of July, 1982.

  
Notary Public

JANICE L. BONDEMORE  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires July 31, 1985

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GPU Nuclear is a part of the General Public Utilities System

cc: Mr. Ronald C. Haynes, Administrator  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

NRC Resident Inspector  
Oyster Creek Nuclear Generating Station  
Forked River, NJ 08731

## ATTACHMENT A

### Violation A:

Technical Specification 6.9.2 and Regulatory Guide 1.16 paragraph C.2.a.(2)(c) require a Licensee Event Report (LER) be submitted when the primary containment is degraded as evidenced by unacceptable containment leak rate type B or C test results.

Contrary to the above, no LER was submitted identifying primary containment degradation evidenced by unacceptable containment leak rate type C test results during a maintenance outage from February 7, until April 6, 1982, and also during the 1980 refueling outage.

### Response:

We agree with the Notice of Violation regarding our noncompliance with Section 6.9.2 of our Operating License and Technical Specifications; however, the violation is incorrect where it states "... no LER was submitted identifying primary containment degradation evidenced by unacceptable containment leak rate type C test results during a maintenance outage from February 7, until April 6, 1982, ...". As referenced in the subject inspection report, two (2) event reports, Reportable Occurrence Nos. 82-019 and 82-020, were submitted on April 1 and April 2, 1982, respectively. Both LER's reported double boundary failures to meet local leak rate acceptance criteria.

It was previously thought that single failures of redundant primary containment isolation valves or gaskets to meet local leak rate acceptance criteria did not constitute a reportable occurrence. These degradations were incorporated into the report of integrated and local leakage rate test results required by Technical Specifications, paragraph 4.5.H. During the course of the subject inspection, the inspector pointed out that these types of single failures did require the submittal of an LER per Technical Specification 6.9.2. Subsequently, an LER was submitted (Reportable Occurrence No. 82-14) to complete the reporting of primary containment degradations found during the recent maintenance outage.

Reporting guidelines are being incorporated into the local leak rate testing procedure to assure that the appropriate reports are made in the future. We appreciate the inspector's efforts in helping to clarify this matter.

Please note that our Operating License and Technical Specifications currently govern the reporting requirements with regard to LER submittals. We feel it is improper that Regulatory Guide 1.16 is quoted in the Notice of Violation as a requirement. As you are aware, Regulatory Guides are not substitutes for regulations, and compliance with them is not required.

Violation B:

Technical Specifications 6.8.1 and 6.8.3 require that written procedures be implemented and temporary changes not alter the intent of the original procedure.

Contrary to the above, the following are examples where approved procedures were not properly implemented and a temporary change altered the intent of the original procedure.

- (1) On three occasions, February 8, March 17, and March 28, 1982, the licensee conducted leak rate tests on primary containment isolation valves NS03A, NS03B, V-1-106, and V-1-107 and did not determine the test results in accordance with specific instructions of Procedure 665.5.003. This resulted in the valves being found acceptable whereas, by procedure, their leakage exceeded the Technical Specification acceptance criteria.
- (2) On March 28, 1982, while conducting a leak rate test on Main Steam Isolation Valve NS04A, the valve packing was tightened without properly documenting this corrective maintenance activity on a Job Order Form as required by Procedure 105, Conduct of Maintenance.
- (3) Primary Containment Leak Rate Test (PCILRT) Procedure 666.5.007 requires that the test valve lineup be performed per the Valve Status Checkoff Sheets and the instruments be in their normal alignment per Procedure 410, Placing Instrument Racks RK-01,2,3,4 in Service. On March 31, while conducting the PCILRT, valve V-38-1021 on the Valve Status Checkoff Sheet had not been verified to be open and the instrument alignment verification had not been started even though the test pressurization had started the previous day, March 30, 1982.
- (4) PCILRT Procedure 666.5.007 requires personnel performing the test to sign the cover page to document the fact that precautions have been read and understood. On March 31, 1982, no personnel had yet signed the cover page, although test pressurization started on March 30, 1982.
- (5) PCILRT Procedure 666.5.007 requires the control room operator to log the reactor vessel flange temperature hourly during the test. On April 2, 1982, the day shift reactor operator was not logging the flange temperature as required and was not aware of the procedure requirement to do so.
- (6) Procedure 107, Procedure Control, requires that "Temporary Change" revisions to procedures be documented on a Station Controlled Distribution Document Request (Form 103-1) when executed. On March 28, 29, 30, 1982, four "Temporary Change" revisions had been executed in the working copy of PCILRT procedure 666.5.007 without being properly documented on the revision request/change Form 103-1.

- (7) Technical Specification 6.8.3 and Procedure 107 permit "Temporary Change" revisions to procedures provided they do not alter the intent of the original procedure. On March 28, 1982, a "Temporary Change" revision was executed in PCILRT Procedure 666.5.007 which deleted the requirement to vent the Instrument Air System Piping inside the drywell. The change altered the scope of the test boundaries and intent of the test procedure to measure the primary containment system overall leakage.

Response:

A response is provided for each of the examples given in the violation. Where clarification and comments are applicable, they have been noted under the appropriate example.

Example B(1)

In each case (February 8, March 17, and March 28, 1982), the leakage results were not determined in accordance with Step 8.1.2 of Procedure 665.5.003 as stated, in that the known leakage of an outside isolation valve was not added to its redundant inside isolation valve. In each case; however, the test result in Step 8.4 was documented as unacceptable for the penetrations and maintenance was requested. Data sheets have been corrected as appropriate.

The controlling procedure for local leak rate testing (665.5.020 "Integrated Local Leak Rate Summary") was used for interpretation of the test results for determination of "as found" and "as left" conditions, effect on status of the prior PCILR and compliance with the allowable limit (.6 La). This procedure is used after the completion of all local leak rate tests for a penetration and contains the statement that when in-line isolation valves are tested individually, the reportable leak rate is the greater of the individual tests. The result of the leak rate tests will; therefore, be interpreted correctly.

Procedure 665.3.003 and other associated local leak rate test procedures will be revised to eliminate the requirement of Step 8.1.2 to add the leak rate of the outside valve to the inside valve.

Example B(2)

The immediate corrective action was to initiate Job Order No. 2153V on April 1, 1982. The description of trouble noted in the job order is given as "MSIV #NS04A needs packing added/as noticed during leak testing". A job order was also initiated by the test engineer to tighten valve packing. However, this job order was voided, since Job Order No. 2153V sufficiently documented the maintenance activities. The requirements of Procedure 105 have been reviewed with all test engineers.

Example B(3)

Procedure 666.5.007, Step 7.3.16, does require that the instruments be in their normal alignment per Procedure 410. However, this does not require that Procedure 410 be executed for the Containment Test. Verification of correct valve position is performed through a review of the Switching and Tagging Log. We feel this is an acceptable method of valve verification for this evolution. The valves covered by Procedure 410 are required to be tagged and logged in the Switching and Tagging Log (Procedure 108) whenever they are in a position different from that specified by Procedure 410, except after surveillance testing at which time a double verification of valve position is performed. Prior to March 30, 1982, the latest revision of Procedure 410 was reviewed by the Test Engineer along with the Switching and Tagging Log. No entries were found in the Tagging Log for valves covered by Procedure 410.

Subsequent investigation has revealed that the valve in question, V-38-1021, is not included in Procedure 410, but in Procedure 412. The corrective action will be to reference Procedure 412 in the PCILRT procedure.

Example B(4)

Procedure 666.5.007 was distributed for review and test preparation on March 15, 1982. The statement in the PCILRT procedure for personnel performing the test to have read and signed the cover sheet that the precautions have been read and understood, is not included in the proper section of the procedure. The corrective action will be to include this statement in the prerequisite section of the procedure rather than the precaution section which does not specify when the signing of the cover sheet should occur.

Example B(5)

This item was not identified to plant management until the exit interview. The corrective action, therefore, was to review the reactor vessel flange temperature recorder chart to determine procedural and Technical Specification compliance with their associated limits of greater than 105°F and 100°F. At no time during the test period did the temperature fall below 125°F.

Since the flange temperature, when the reactor vessel head is tensioned in place, is required to be greater than 100°F by Technical Specification, the Shutdown Log will be revised to incorporate flange temperature recording. Procedure 665.3.007 will then be modified to eliminate the requirement to log that temperature during the test.



Example B(6)

The corrective steps taken were to complete the required Station Controlled Distribution Document Request form (Form 103). The test engineer had incorrectly assumed that he could complete the administrative 103 forms after the temporary changes had been effected. The requirement to complete Form 103 simultaneously with the temporary changes has been reviewed with each test engineer.

Example B(7)

The corrective steps taken were to perform a Local Leak Rate Test on the penetration and include the results in the PCILRT results. Further corrective action will be to revise Procedure 666.5.007 to insure that valve alignment changes are not made without first obtaining the approval from a member of the Plant Operations Review Committee.

In addition to those immediate corrective steps noted in the above examples, an investigation was conducted of each example of procedural violation noted in the report. The results of the investigation indicate that the primary cause of each example given was a lack of understanding of the intent or interpretation of a procedure or sections of a procedure. The PCILRT procedure, although deficient in some areas, was in fact a workable procedure. The majority of problems can be attributed to poor implementation due to inadequate preparation and training of the relatively inexperienced personnel involved in the test.

The corrective steps that are currently in progress to avoid future violations is a complete review of leak rate test procedures for organization, accuracy and clarity. Assistance in this review process will be given by the on-site Startup and Test Department who will also assist in the implementation of those procedures when required. A review of the completed procedures by the test engineers for purposes of training will also be conducted. Procedure review, revision, approval, and training will be accomplished prior to the next required implementation of the leak rate test procedures. The above actions should ensure that future violations in this area will be avoided.

We realize some of the procedural violations, with regard to the performance of our PCILRT, are of a recurrent nature. Our corrective actions for violations are now tracked to completion by a formal program administered by our Licensing Department. Outstanding items are brought to the attention of upper management and a summary report is provided to the Office of the President on a monthly basis. The current program will ensure that corrective actions are implemented in a timely fashion.