



GPU Nuclear
100 Interpace Parkway
Parsippany, New Jersey 07054
201 263-6500
TELEX 136-482
Writer's Direct Dial Number:

December 29, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Eisenhut:

SUBJECT: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Cycle 10 Refueling Outage

On December 11, 1981 we held a meeting with the NRC staff to review the future outage planning for the Oyster Creek Nuclear Generating Station. As a result of this meeting a formal request for the deferral of some previously committed to items was sent to the NRC on December 24, 1981. As discussed in the meeting and our letter, the underlying basis for our request was that the total scope of all identified work made doing it all in one outage unmanageable and potentially unsafe. Your response of July 30, 1982 provided definitive action on most of the items in our request; however, it indicated that the deferral of items 11, 12, 13, 15, 16, and 17 were to be handled as a separate licensing action related to generic letter 82-05 and 82-10 (an enclosure to this letter identifies the subjects covered by these items). Since that time numerous discussions between our staff's on this matter, including a meeting in Bethesda, Maryland on September 3, 1982, have taken place. However, no further formal correspondence has been received on these items to date.

The issues addressed in item 13 above have been superseded by the requirements of Title 10, Section 50.44. Our letter of August 2, 1982 requested exemption from Title 10, Section 50.44, paragraph c3ii in its entirety and paragraph c3iii with respect to the requirements for Reactor Vessel Head Vents. It was further requested that the requirement for installing high point vents on the Isolation Condensers be deferred until the Cycle 11 Refueling Outage. No formal correspondence concerning our letter of August 2, 1982 has been received to date.

A001

8301030180 821229
PDR ADOCK 05000219
P PDR

Our letter of December 24, 1981 provided a brief safety assessment associated with each anticipated deferment. It is still our conclusion, based on these safety assessments, that deferral of these items for one (1) additional operating cycle does not constitute a significant safety concern. Based on that and the absence of any response from the NRC on the items identified above, the outage plan for the Oyster Creek Nuclear Generating Station does not include provisions for the above listed items. As we have previously indicated, we had found that the total demands of the original outage work scope exceeded any reasonable ability to manage the outage. Since then, we have had to add additional inspection of recirculation piping with potential for significant repair and radiation exposure. We consider further additions to the outage scope at this late date to be severely disruptive and warranted only to address an immediate safety concern. Accordingly, we request your review and approval of our requested deferment.

Very truly yours,

Philip R. Clark
Philip R. Clark
Executive Vice President
GPU Nuclear

/blf

Enclosure

ENCLOSURE

Cycle 10 Refueling Outage

- Item 11 Containment Vent and Purge System Upgrade - NUREG-0737/
 II.E.4.1
- Item 12 Post Accident Sampling System - NUREG-0737/II.B.3
- Item 13 RCS Vent on Isolation Condenser - NUREG-0737/II.B.1
- Item 15 Containment High Range Radiation Monitor - NUREG-0737/
 II.F.1
- Item 16 Recirculation Valves Interlock Modification - NUREG-0737/
 II.K.3.19
- Item 17 Radiation Signals Purge and Vent Valves - NUREG-0737/
 II.E.4.2