



GPU Nuclear

P.O. Box 388
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Writer's Direct Dial Number:

January 3, 1983

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

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Inspection No. 82-23

In accordance with 10 CFR 2.201, the attachment to this letter provides our response to Violation B of the Notice of Violation contained in your letter of November 18, 1982. Our response to Violation A was forwarded by our letter dated December 21, 1982. An extension of this response was requested by GPU Nuclear December 20, 1982, and granted by NRC Region I on the same day during a telecon with Mr. Todd Jackson.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "P. B. Fiedler", written over a horizontal line.

Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF:MWL:jal
Attachment

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

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ATTACHMENT

Violation B

Monitoring Requirements of Section 2.0 of the Oyster Creek Environmental Technical Specifications (OCETS) requires that the thermal monitoring system be calibrated. Section 1.0 of the OCETS defines calibration to encompass all aspects of the circuit, including the sensor, indicating control features, alarm, and/or trip functions.

Contrary to the above, as of September 17, 1982, the periodic routine thermal monitoring system calibrations performed since July 1981 did not include calibration of the integrated system including the thermal sensor (RTD).

Response

The violation is correct in that calibration being performed did not include the thermal sensors, but rather only encompassed the circuit from the sensor to the instrumentation in the control room. The instrumentation being utilized as sensors are Resistance Temperature Detectors (RTD). Based on manufacturer's documentation and field application experience, accuracy drift is not inherent in these devices. Failure of an RTD would be indicated by gross upscale or downscale indication. Our choice in providing such an accurate and reliable sensor was predicated on the degree of accuracy needed for this application. Although the calibrations which were performed did not include the thermal sensors, based upon the manufacturer's documentation and field application experience with the type of sensor utilized, we feel confident that the thermal monitoring system has been providing accurate temperature indication which meet the objectives of our Technical Specification monitoring requirements.

The thermal monitoring system contains redundant sensors at three separate remote locations. An accurate method of full range in-situ calibration of the sensors is not practicable at this time. In-situ calibration of these sensors over the full range poses not only practical problems of providing a calibration medium over a range of 20°F to 120°F in the field, but also poses certain personnel safety and environmental concerns. This is particularly evident at the U.S. Route 9 bridge location where personnel must perform the calibration while standing on an unused railroad tressel directly over the Oyster Creek discharge canal. Performing a calibration at such a precarious location, especially during the inclement weather often experienced during the winter months, presents certain safety hazards to our personnel. Also, to conduct the calibration requires removing the sensor from an approximately 10 foot long tube which is filled with oil to protect the sensor cable. The additional activity associated with calibrating the sensor, as opposed to replacement with a precalibrated sensor, adds increased risk of inadvertently spilling this oil into the discharge canal. In order to comply with the calibration requirements for these six (6) sensors, we plan to replace each sensor on a monthly basis during plant operation with a vendor calibrated RTD. The replacement will be done concurrent with conducting the monthly system calibration. Replacement with a vendor calibrated sensor concurrent with calibration of the remainder of the circuit by station personnel will constitute calibration of all aspects of the circuit, consistent with the requirements of the OCETS. Additional sensors have been ordered to implement this program and delivery is expected within six (6) weeks. The replacement program will be implemented within thirty days after receiving the spare monitors. At this time, full compliance will be achieved.