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March 29, 1991  
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U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

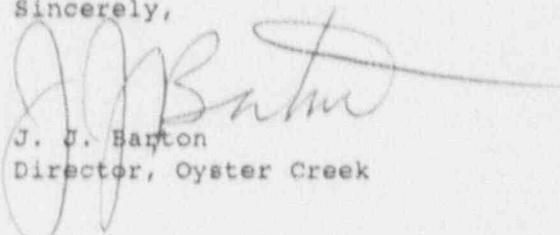
Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)  
Docket No. 50-219  
Alternate Rod Injection Implementation at OCNGS  
per 10 CFR 50.62 (ATWS Rule)

Your letter dated January 24, 1991 and received on January 30, 1991 requested a sixty (60) day response confirming that Oyster Creek Nuclear Generating Station complied with the Staff's position regarding diversity of trip units between the Alternate Rod Injection System and Reactor Trip System. The purpose of this letter is to respond to your request and notify you that we intend to request relief from this specific Staff Position in accordance with 10 CFR 50.12.

GPU Nuclear will submit a relief request within 90 days of the date of this letter. Special circumstances are present which would allow the Commission to deviate from the generic position. Such circumstances were recognized by the Staff in their response to CRGR, as noted in the CRGR meeting minutes of Meeting No. 189, on June 27, 1990. In Enclosure 3 to your letter (page 4, paragraph 5), the Staff acknowledged that a basis may exist for the licensee to request relief on a plant specific basis due to the "extraordinary difficulty and great expense in implementing the (Staff's generic) position..." This is the case for Oyster Creek. Our submittal, in accordance with 10 CFR 50.12, will address these issues in detail.

Sincerely,

  
J. J. Barton  
Director, Oyster Creek

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JJB/GMG/plp  
cc: Administrator, Region 1  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager

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