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March 29, 1991
C321-91-2074

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

Dear Sir:

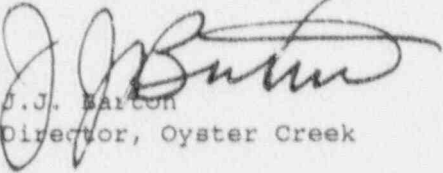
Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 91-01
Reply to a Notice of Violation

In accordance with 10 CFR 2. 201, the enclosed provides GPU Nuclear's response to violation A identified in NRC's Inspection Report 50-219/91-01.

As stated in the cover letter of our response to violation B dated March 18, 1991, an extension of the due date for violation A was granted by your staff on Friday, March 15, 1991.

If further information is required, please contact Brenda DeMerchant, OC Licensing Engineer at (609)971-4642.

Very truly yours,


J.J. Barton
Director, Oyster Creek

JJB/BDeM/jc
cc: Administrator, Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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Violation A. 10 CFR 50.49 requires that environmental qualification of electric equipment important to safety that are relied upon to remain functional during and following a design basis event shall be established. A record of qualification documentation must be maintained in an auditable form.

Contrary to the above, on December 13, 1990, the environmental qualification of electric splices in the core spray pumps P-20-2A, P-20-2C, and containment spray pumps P-21-1A and P-21-1B was not established in that the splices were different from the ones recorded in the licensee's qualification documentation. Additionally, auditable documentation was not maintained which indicates the type of splices that exist on core spray pump P-20-1B motor leads.

This violation is severity level IV (Supplement 1).

Response:

1. GPUN concurs with the violation as stated, however we disagree with a statement in the cover letter of the subject inspection report which states "We are concerned about the first violation because it was not addressed after identification in February 1990, and it may show weakness in the equipment qualification program". In addition we also disagree with a statement on page 8 of the inspection report which states "no operability determination was completed and corrective action had not been implemented before December, 1990.

In late 1989, the Environmental Qualification (EQ) group was asked to review and provide input on splices in core spray booster pumps P-20-2A, P-20-2C and containment spray pumps P-21-1A, P-21-1B, in support of planned maintenance activities. As a result of this inquiry, the EQ group identified inconsistencies in the baseline data for the four splices in question which prompted a request for inspections to 1) obtain data necessary to obtain replacement splice kits and 2) to attempt to verify by visual inspection that the splices were what had been identified and qualified in the 1985-1986 time frame and to replace the splices, if necessary. These inspection requests (job orders) were submitted on 12/19/89 and were to be conducted during an outage of sufficient duration or during the 13R refueling outage.

Splices P-21-1A and P-21-1B were inspected on 2/7/90 and dispositioned on 2/9/90. However, due to miscommunications the fact that motor splices P-20-2A and P-20-2C had been inspected and closed out at the site on 2/9/90 was not evident to the EQ group until 12/10/90. On 12/12/90 the EQ group determined that a deviation existed and a determination of operability was issued on 12/13/90 for both splices. On 12/15/90 splice P-20-2C was replaced with a qualified splice.

2. Reason for the Violation:

When GPUN first began compiling the EQ master list in 1985-1986, it was obvious that a 100% walkdown of all applicable components in the plant would be impractical. Therefore by using a combination of procurement records, modification records, vendor information and representative walkdowns, data was gathered to determine the manufacturer and model number of components required to be qualified as part of the EQ master list. While GPUN's program provides reasonable assurance that the auditable EQ documentation represents the plant configuration it is not predicated on verification walkdowns for all components. A reinspection of the splice for P-20-1B verified that the auditable documentation (i.e., the EQ file) on the splice was accurate.

During the early phases of the Oyster Creek EQ Program; i.e., 1985-1986, the tape splices for twelve EQ pump motors were uniquely identified as being original construction splices consisting of specific organic material which was qualified in accordance with EQ File OC-388. This file was reviewed in 1986 as part of the 86-08 inspection for 10 CFR 50.49 compliance.

Included within this group of twelve splices are the four splices referenced in Violation A of Inspection Report 91-01. Since these twelve splices are the only large motor lead splices on the EQ Master List, they have been programmatically viewed as a unique group and were qualified as such.

Additionally, as a result of our 1986 inspections, GPUN identified tape splices associated with five EQ components. All these tape splices were removed in 1986 during the 11R refueling outage. The EQ File was revised and programmatic controls were implemented to prohibit the future use of tape splices within the EQ program. GPUN therefore believes that the unique nature of this finding along with existing program requirements indicate that additional plant walkdowns are not warranted.

Since the inception of the EQ program in November, 1985 there has not been a significant number of deviations where equipment was determined to be different than that which was established by the EQ file. All self identified issues have been systematically addressed, corrective actions have been implemented and a determination was made that no safety significance was associated with these items.

3. Corrective Steps that have been Taken and the Results Achieved:

Motor splice P-20-2C was replaced with a qualified heat shrink splice on 12/15/90. Splices P-20-2A, P-21-1A and P-21-1B were replaced during the current 13R refueling outage. The remaining eight motor splices will all be inspected during 13R to verify that they are what is identified in the EQ file. Any splices that are not qualified will be replaced prior to restart. This will address all twelve of the splices described in this response prior to restart from the 13R outage.

4. Corrective Steps that will be taken to Avoid Further Violations:

GPUN will review the EQ program to determine what new items would be prudent to add as an extension of the existing computerized engineering data base. Introducing this level of control will enhance the future identification, control and documentation related to these items. In this way EQ component configuration will be more readily understood and maintained, likewise potential deviations will be addressed more efficiently.

An evaluation of the process to identify and correct EQ deficiencies is being conducted. This evaluation focuses on responsibilities, interfaces, work authorization systems, document closeout and overall effectiveness. The results of this evaluation will be reviewed for potential program improvements as well as EQ training of the appropriate personnel as required.

5. Date When Full Compliance Will Be Achieved:

Full compliance was achieved on 3/26/91 when motor splices P-20-2A, P-21-1A and P-21-1B were replaced with qualified splices. As stated earlier, P-20-2C was replaced with a qualified heat shrink splice on 12/15/90.