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Writer's Direct Dial Number:

November 16, 1990  
C321-90-2008

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 90-16  
Reply to a Notice of Violation

In accordance with 10 CFR 2. 201, the enclosed provides GPU Nuclear's response to the violation identified in NRC's Inspection Report 50-219/90-16.

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

Very truly yours,

E.E. Fitzpatrick  
Vice President and Director  
Oyster Creek

EEF/BDeM/jc

Enclosure

cc: Mr. Thomas Martin, Administrator  
Region 1  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
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NRC Resident Inspector  
Oyster Creek Nuclear Generating Station

Mr. Alexander Dromerick  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
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Violation:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained that meet or exceed the requirements of NRC Regulatory Guide 1.33.

Regulatory Guide 1.33, Rev. 2, endorses ANSI N18.7-1976, Section 5.2.2, which requires that procedures be followed.

Station Procedure 328, Rev. 14, "Turbine Building Heating and Ventilation System," requires the turbine building operating floor to be maintained at an atmospheric pressure of 0.0 inch water gauge when exhaust fan 1-33 is not operating.

Contrary to the above, written procedures were not followed in that, on August 27, 28, and 30, 1990, the turbine building operating floor was maintained at a higher than atmospheric pressure when exhaust fan 1-33 was not operating.

Response:

Admission of Violation:

GPUN concurs with the violation as stated.

Reason for the Violation:

The violation occurred due to a design deficiency in the turbine building differential pressure gauge. This gauge (DPI-389) has a scale of 0" to -2.5"wg. However the gauge does not indicate when a positive differential pressure exists and thus the operator cannot readily determine an out of specification condition.

Corrective Steps that Have Been Taken:

A new gauge has been ordered to replace the existing gauge. The new gauge is identical to the existing gauge in every way except for scale. The new gauge will have a scale of -2" to 2" wg. This scale will allow the operators to determine if a positive differential pressure condition exists on the turbine building operating floor. This gauge is expected to be installed during the first quarter of 1991.

Corrective Steps that will be Taken Avoid Further Violations:

A draft change to Procedure 328, "Turbine Building Heating and Ventilation System" has been developed to provide guidance to the operators on how to reestablish a zero or negative differential pressure if a positive differential pressure exists on the turbine building operating floor. Interim guidance has been provided to the Operations staff to ensure they are knowledgeable of the need to maintain a negative pressure, and of the actions to take to restore negative pressure should the building go positive.

The FSAR will be revised to address the turbine operating floor being maintained at an atmospheric pressure of zero inches water gauge when exhaust fan 1-33 is out of service. This revision will be integrated into the FSAR upgrade program which is scheduled for completion by the end of 1991.

Date Full Compliance was Achieved:

Full compliance was achieved on September 1, 1990 when the turbine building operating floor differential pressure was returned to normal.