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September 19 , 1994  
C321-94-2153

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

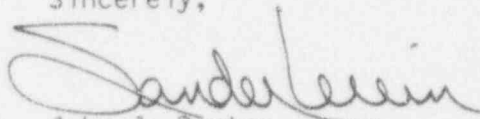
Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection Report 50-219/94-11  
Reply to a Notice of Violation

Enclosure 1 to NRC Inspection Report 50-219/94-11 contained two Notices of Violation. Attachments I and II to this letter contain the replies to the Notices of Violation, as required by 10 CFR 2.201.

If any additional information is required, please contact Mr. David Distel, GPUN Licensing, at 201-316-7955.

Sincerely,

  
for John J. Barton  
Vice President and Director  
Oyster Creek

DJD

Attachments

c: Oyster Creek NRC Project Manager  
Administrator, Region I  
Senior Resident Inspector

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## **ATTACHMENT I**

### **VIOLATION 94-11-01:**

"10 CFR 50, Appendix B, Criterion V (Instructions, Procedures, and Drawings), states, in part, Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria..

Contrary to the above, as of July 1, 1994, the static and dynamic motor-operated valve test procedures did not contain acceptance criteria. The static test procedures did not specify conditions necessary for the test to be acceptable and the dynamic test procedures did not specify conditions necessary for returning the MOV to service."

### **GPUN REPLY:**

GPU concurs with the violation as written.

### **REASON FOR VIOLATION**

Although MOV thrust "target values" were supplied to field personnel performing the test on computer generated data sheets, these values were generally not included with the test results and were not considered to be acceptance criteria. These values were utilized by field personnel to determine when the MOVATS test data disk could be submitted to Plant Engineering personnel for review and acceptance. This informal method of determining acceptance developed due to numerous ongoing changes to the acceptance criteria of the MOV's in the program caused by evolving issues in the generic MOV program. In order to minimize the impact on procedure changes, we had previously removed the thrust targets from the formal acceptance criteria in the MOVATS test procedure.

The previously discussed "target values" utilized the design verified, formally issued thrust values provided by Technical Functions Engineering personnel which were entered into a site operated computer calculation program that had been developed from the generic MOVATS methodology. The output of this computer program was the data sheet containing "target values" that Plant Engineering provided to field personnel.

### **CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED**

No immediate corrective actions were necessary since the "target values" provided to field personnel utilized verified, formally issued thrust values as input.

**ATTACHMENT I  
(CONT'D)**

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS**

In order to further ensure the integrity of this data and to establish formal acceptance criteria that can be included with the field test packages, and to eliminate the need to perform subsequent data manipulations and calculations, GPUN has revised the MOVATS test procedure to provide engineering generated "verified target values" to field personnel prior to testing. These "verified target values" utilize the design verified thrust values provided by Technical Functions Engineering as input to the site operated computer calculation. We independently verify that the design values have been correctly entered into the computer program as well as performing an independent verification of a computer generated calculation to verify the computer program. The output values then become the "verified target values" that will be issued to the field personnel. No additional calculations will need to be performed later on the MOVATS trace.

The revised MOVATS Test Procedure (2400-GME-3918.54) also includes the appropriate level of engineering review required in order to consider a valve operable from a technical analysis standpoint, and requires an engineering signature to return the MOV to service. A "MOVATS Analysis Guideline" has been developed and will be used to perform the signature analysis on future static and dynamic tests. The guideline will specify the minimum thrust related conditions necessary for returning the MOV to service following a static or dynamic test. The guideline includes a method of extrapolating required thrust following a dynamic test at pressures below the calculated design basis and comparison with the dynamic test results.

**DATE WHEN FULL COMPLIANCE WAS ACHIEVED**

Full compliance was achieved on September 9, 1994 when the MOVATS Test Procedure, 2400-GME-3918.54, Revision 3 was issued as described above.

## ATTACHMENT II

### VIOLATION 94-11-02:

"10 CFR 50, Appendix B, Criterion III (Design Control), states, in part, The design control measures shall provide for verifying or checking the adequacy of design,... The verifying or checking process shall be performed by individuals or groups other than those who performed the original design...

Contrary to the above, as of July 1, 1994, the math operations utilized in the static and dynamic motor-operated valve test evaluations were not documented and there was no evidence that they were independently reviewed. There were also four identified cases where the same individual who signed the MOV signature analysis as "analyst", also signed the test procedure indicating acceptability of the tests."

### GPUN REPLY:

GPUN concurs with the violation, in part.

### REASON FOR THE VIOLATION

GPUN concurs with the first part of this violation stating that the math operations utilized in the static and dynamic test evaluations were not documented. These math operations were performed during the data analysis process and involved only a comparison of design values to the data obtained during the test. These math operations were not considered part of design control measures.

GPUN does not concur with the second part of this violation that implies that design calculations were performed onsite that required subsequent design verification or independent reviews. Formal design calculations were performed by Technical Functions Engineering and were design verified and entered into our formal configuration control data base.

The calculations or data manipulations performed onsite simply adjusted the design verified thrust values to include diagnostic equipment inaccuracies and torque switch repeatability tolerances. As such, they do not represent design calculations and are not subject to 10 CFR 50 Appendix B criteria for design verification or independent review. This is the reason that several "Reviewed By" blocks were unsigned. As discussed in response to Violation 94-11-01 in Attachment I, we are enhancing the implementation of the OC MOV program and minimizing the potential for error by adjusting the design thrust values for diagnostic equipment inaccuracies and torque switch repeatability and verifying those values prior to generating the "target values". They will be formally included with the test packages as acceptance criteria, and the interpretation of the MOVATS test trace and comparison against these acceptance criteria will be independently reviewed and signed-off by a qualified analyst.

ATTACHMENT II  
(CONT'D)

CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

No deficiencies were identified as a result of lack of documentation of the adjustment of design thrust values to include diagnostic equipment inaccuracy and torque switch repeatability. Therefore, no immediate corrective actions were necessary.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

As discussed in response to Violation 94-11-01 in Attachment I, we have revised our methodology to eliminate standard calculations involving test results. Normal data manipulations and adjustments will be performed by the site operated computer program prior to testing the MOV. As described in response to Violation 94-11-01 (Attachment I), inputs to the MOVATS computer program will be independently reviewed and the computer output will be checked to verify formulas were properly input. Assessments or unique calculations performed on the test data will be documented.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on September 9, 1994 when the MOVATS Test Procedure, 2400-GME-3918.54, Revision 3 was issued as described in response to Violation 94-11-01.